

August 1, 2023

BY E-MAIL

Mr. David Patacairk
Senior Legal Counsel
City of Ottawa
110 Laurier Avenue West, 3rd Floor
Ottawa, Ontario, K1P 1J1

Dear Mr. Patacairk:

Re: Policy Grievance of CIPP – Hybrid Work: Mandatory requirement for all members to work for a minimum of two (2) days/week at a City Facility

This letter constitutes a policy grievance by the Civic Institute of Professional Personnel (“CIPP”) which is submitted at Step 2 of the grievance procedure pursuant to Article 19 of the Collective Agreement. CIPP reserves the right to amend this grievance.

CIPP is filing this policy grievance as a result of concerns over the Employer’s policy decision to require CIPP members to work at a City Facility for a minimum of two (2) days/week, effective September 2023. Our concerns include, but are not limited to:

- The Employer’s decision being arbitrary and unreasonable. The Employer has failed to demonstrate an acceptable rationale for the decision to impose a “one size fits all” rule for every employee to work at a City Facility for a minimum of two (2) days per week. The Employer has failed to consider the impact of their decision to a member’s work/life balance. The evidence collected by CIPP demonstrates that the Employer’s policy decision will negatively and significantly impact our member’s productivity and work/life balance. The Employer’s decision is not evidence based. The Employer has provided no evidence to support their claim that this policy change will improve collaboration, nor have they demonstrated that they reviewed any other solutions that would have allowed the prior, more flexible policy to remain in place.
- The Employer failed to consult with CIPP on the policy decision and the application and implementation of such policy, consistent with Article 40.01 of the Collective Agreement
- CIPP is also concerned for the Health & Safety of its members in relation to this policy decision. The Employer has failed to demonstrate what measures would be taken to ensure the health and safety of their employees, in a context where COVID-19 is still prevalent within the community, and consistent with their obligations under the Occupational Health and Safety Act.
- The Employer’s conversion to hoteling spaces for the key administrative sites (Mary Pitt Centre, Ben Franklin Place, City Hall and Centrum) results in a lack of privacy, a lack of appropriate space, and a lack of appropriate equipment for our members to work and be productive within those workplaces.

The grievance therefore arises as a result of:

- The employer’s violation of Article 3 – Management Rights
- The employer’s violation of Article 40 – Alternative Work Arrangements

- The employer's violation of Article 43 – Occupational Health & Safety
- The employer's violation of any other relevant articles of the collective agreement, relevant employer's policies and guidelines, and relevant legislation.

Therefore, CIPP is seeking redress for its members as follows: for the arbitrary policy decision to be reversed, for alternative work arrangements, including Hybrid Work, to be individually assessed, subject to legitimate operational requirements and allow for up to five (5) days per week to work from home, in line with the CIPP Collective Agreement. As well, for the Employer to put in place appropriate health & safety guidelines related to in-office work, and for appropriate workspaces and equipment to be proactively planned and provided to our members for any days working at a City Facility.

Yours truly,



Peter Bleyer
Executive Director
Civic Institute of Professional Personnel