



Federal Public Sector
Labour Relations and
Employment Board

Commission des relations
de travail et de l'emploi
dans le secteur public fédéral

ANNUAL REPORT 2024-25

PARLIAMENTARY EMPLOYMENT
AND STAFF RELATIONS ACT

EXCELLENCE IN RESOLUTION

Fostering Harmonious Labour Relations and
Employment Practices in the Federal Public Sector





© Minister of Transport and Leader of the Government in the House of Commons, 2025

Cat. No. SV1-1E-PDF / ISSN: 2563-9056

This publication will also be available on the Board's website.

The Honourable Steven Mackinnon
Minister of Transport and
Leader of the Government in the House of Commons
House of Commons
Ottawa ON K1A 0A6

Dear Minister,

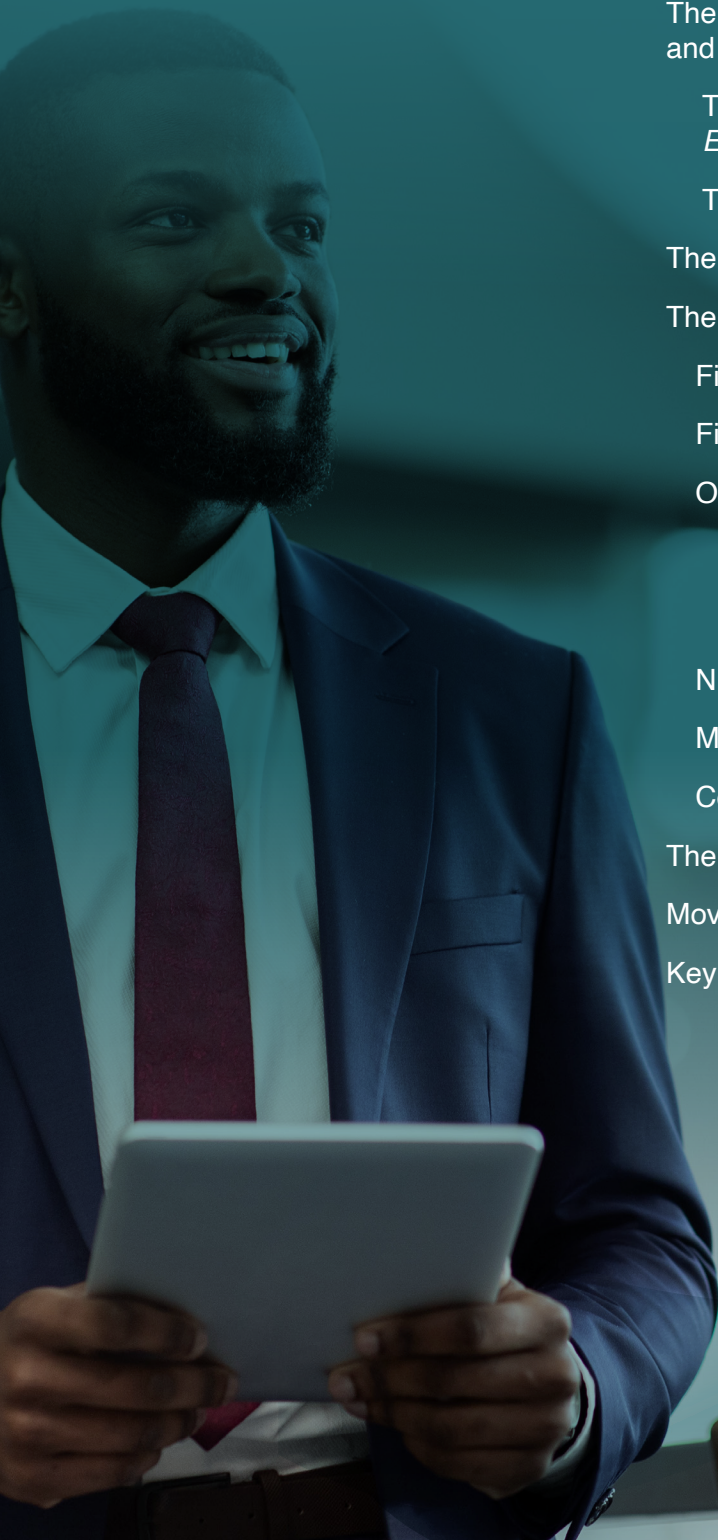
As Chairperson of the Federal Public Sector Labour Relations and Employment Board, it is my pleasure to transmit to you, pursuant to section 42 of the *Federal Public Sector Labour Relations and Employment Board Act*, this Annual Report of the Federal Public Sector Labour Relations and Employment Board, covering the period from April 1, 2024, to March 31, 2025, for submission to Parliament.

Yours sincerely,

Edith Bramwell
Chairperson
Federal Public Sector Labour Relations and Employment Board

Contents

Land Acknowledgment	5
Message from the Chairperson	6
Who We Are	7
Composition	7
The Board’s Mandate, Commitment, and Jurisdiction.....	8
The Board’s mandate under the <i>Parliamentary Employment and Staff Relations Act (PESRA)</i>	8
Types of matters heard under the <i>PESRA</i>	9
The Board’s Work	10
The Board’s Performance.....	11
Files Received	11
File Closure.....	11
Overview of the case file inventory	12
Files carried forward, received, and closed under the <i>PESRA</i> from April 1, 2021 to March 31, 2025	12
Number of hearings scheduled.....	13
Mediation	13
Collective Bargaining	13
The open court principle	14
Moving Forward.....	14
Key decision	15



Land Acknowledgment

The Federal Public Sector Labour Relations and Employment Board (“the Board”) acknowledges with gratitude that our main offices are located on the traditional, unceded territory of the Algonquin Anishinaabe Nation. For countless generations, the Algonquin people have maintained deep relationships with these lands and waters while shaping the region through their stewardship, knowledge, and cultural traditions.

As the Board’s work extends across Canada, we recognize the wide diversity of Indigenous nations — First Nations, Inuit, and Métis — whose unique histories, laws, and worldviews continue to shape this country. We offer our gratitude for the opportunity to live, work, and learn in these territories.

We recognize the ongoing impacts of colonization and the strength of Indigenous peoples in preserving their identities, languages, and traditions. This acknowledgment is part of our continuing commitment to truth, reconciliation, and building respectful relationships.

Reconciliation is an ongoing responsibility. The Board is dedicated to ensuring that our policies, procedures, and services are informed by the principles of justice, inclusivity, and respect for all. We invite all who engage with our work to join us in the shared journey toward truth, understanding, and lasting change.

Message from the Chairperson



It is my privilege to present the Board's 2024-2025 Parliamentary Employment and Staff Relations Act Annual Report for a year marked by steady progress, sustained innovation, and a renewed commitment to access to justice, as we continue to advance our mandate with focus, resilience, and innovation.

Building on the foundation of recent years, 2024-2025 was a year of consolidation — a period to deepen the impact of our initiatives, reinforce our operations, and sustain momentum. By stabilizing key projects, including case-flow modernization and targeted scheduling strategies, we secured our gains, refined internal systems, prioritized income-at-risk matters, and ensured the timely, fair resolution of cases before the Board.

As part of our commitment to enhancing access to justice, we also continued to prioritize alternate dispute resolution. Settlement conferences and other early-resolution mechanisms remain central to our approach, offering parties meaningful opportunities to resolve their disputes in a collaborative, timely, and cost-effective manner. The ongoing use and integration of these processes not only improves outcomes but also supports more constructive labour relations across the federal public sector.

As we look ahead, our focus remains on refining our practices, supporting access to justice, and upholding the values that guide our work. I remain deeply grateful to our Board members, Secretariat employees, and the staff of the Administrative Tribunals Support Service of Canada for their expertise, commitment, and ongoing contribution to the Board's success.

Edith Bramwell, Chairperson

Federal Public Sector Labour
Relations and Employment Board

Who We Are

Composition

Chairperson

- Edith Bramwell

Vice-chairpersons

- Marie-Claire Perrault
(until September 13, 2024)
- Amélie Lavictoire

Full-time Board members

[Adrian Bieniasiewicz](#)

[Pierre Marc Champagne](#)

[Caroline Engmann](#)

[Goretti Fukamusenge](#)

[Bryan R. Gray](#)

[Patricia Harewood](#)

[Chantal Homier-Nehmé](#)

[John G. Jaworski](#)

[Audrey Lizotte](#)

[Christopher Rootham](#)

[Nancy Rosenberg](#)

[Brian Russell](#)

Part-time Board members

[Joanne Archibald](#)

[Fazal Bhimji](#)

[Deborah Cooper](#)

[Guy Giguère](#)

[Guy Grégoire](#)

[Drew Heavens](#)
(since December 2, 2024)

[David Jewitt](#)

Steven B. Katkin

James Knopp
(until January 27, 2025)

[David P. Olsen](#)

[David Orfald](#)

[Renaud Paquet](#)

Leslie Anne Reaume
(until September 29, 2024)

[Augustus M. Richardson](#)

The Board's Mandate, Commitment, and Jurisdiction

The Board's mandate under the *Parliamentary Employment and Staff Relations Act (PESRA)*

Among other legislation, the Board administers Part I of the *PESRA* and aims to resolve disputes that arise between parliamentary employees and their employer. The *PESRA* covers employment and labour relations at the Library of Parliament, the House of Commons, the Senate, the Office of the Senate Ethics Officer, the Office of the Conflict of Interest and Ethics Commissioner, the Parliamentary Protective Services, and the Parliamentary Budget Officer.

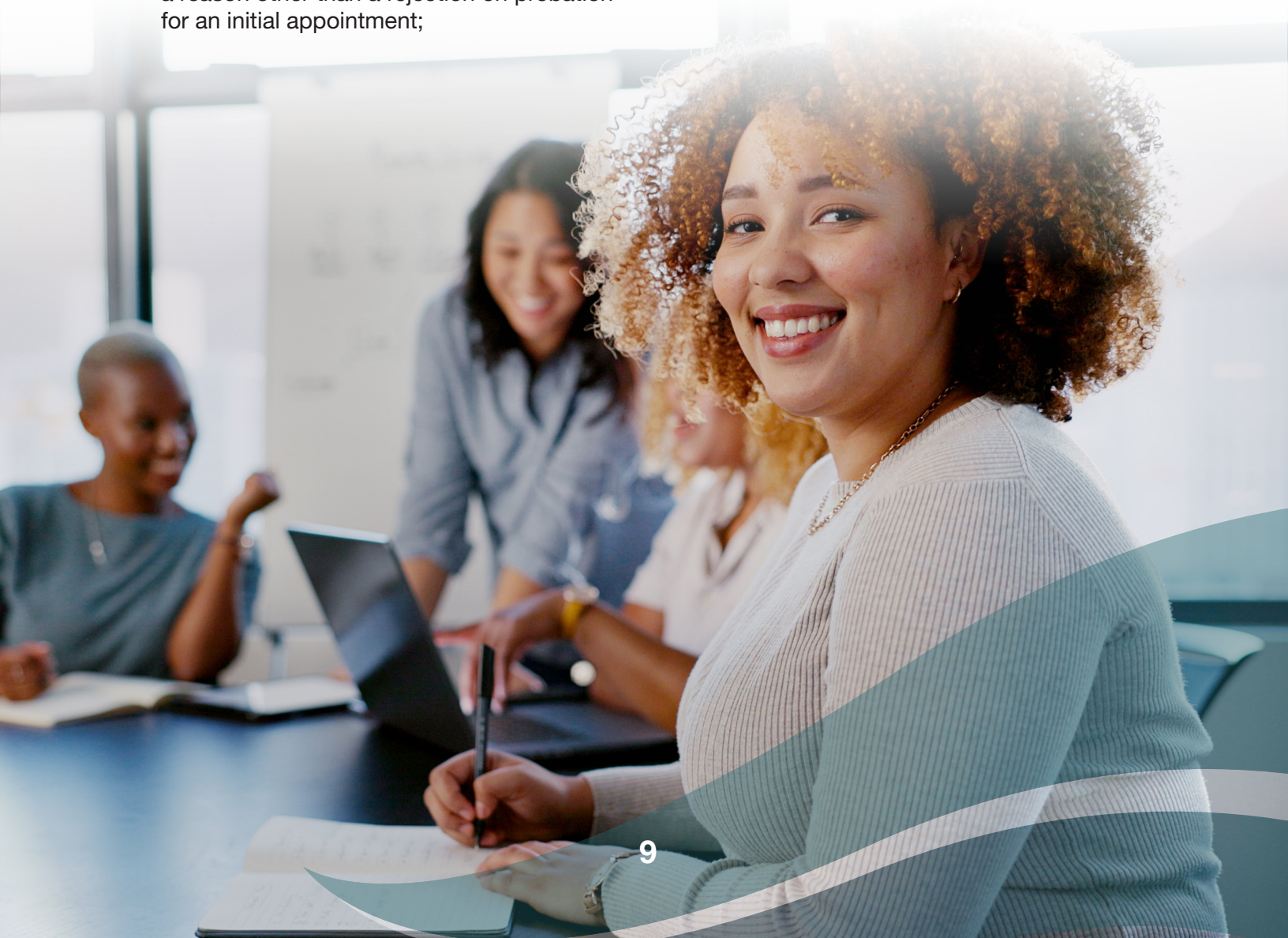
Part I of the *PESRA* gives parliamentary employees the right to form a union and to engage in collective bargaining to establish their terms and conditions of employment. It also gives them the right to file grievances about those conditions and, in certain cases, to refer them to adjudication before a neutral third party. Under the *PESRA*, the Board can also hear applications for certification, unfair-labour-practice complaints, and designations of persons employed in managerial and confidential capacities. It can also hear grievances about the interpretation and application of collective agreement or arbitral award provisions, disciplinary action resulting in a suspension or financial penalty, the demotion of an employee, the denial of an appointment, the classification of an employee, and all forms of termination of employment except rejections on probation during initial appointments.

The *PESRA* also gives the Board the authority to hear grievances about contraventions of regulations under the *Accessible Canada Act*.

Types of matters heard under the *PESRA*

The following types of matters may be adjudicated under the *PESRA*:

- applications for certification or the revocation of certification, or applications for the designation of a person employed in a managerial or confidential position;
- unfair-labour-practice complaints;
- grievances related to the interpretation or application in respect of the employee of a collective agreement provision or an arbitral award;
- grievances against a disciplinary action resulting in a suspension or financial penalty or against a termination of employment for a reason other than a rejection on probation for an initial appointment;
- grievances about a demotion, a denial of an appointment, or classification (i.e., the parties select an adjudicator who is not a Board member to hear and determine such grievances);
- grievances about a contravention of the regulations under the *Accessible Canada Act* if the employee has been adversely affected as a result of the contravention; and
- references under s. 70 of the *PESRA*, seeking the enforcement of an obligation under the collective agreement or an arbitral award that cannot be the subject of a grievance filed by an individual employee. The reference can be made by an employer or a bargaining agent.



The Board's Work

Fair labour and employment practices in the federal public service help maintain its stability and effectiveness. Through its accessible dispute resolution and adjudication services, the Board supports a productive workplace environment and sound labour and employment practices.

Hearing and deciding grievances, complaints and other disputes

- Through formal oral and written hearing process, the Board receives evidence from the parties, while ensuring that all parties have an equal right to present their evidence and make their submissions.
- Board members provide carefully articulated decisions based on their consideration of the evidence and submissions.

Providing other pathways to resolution

- Informal resolution processes give parties more control in resolving their collective bargaining, grievance, staffing and other disputes.
- These informal processes are often quicker and less expensive and allow for more privacy and confidentiality. This enhances access to justice and allows the Board to focus on cases that require a more formal approach.
- Through these resolution pathways, the Board fosters open, respectful communication, and fair, transparent employment and staffing practices.
- Mutually agreed resolutions eliminate the need for a Board decision which imposes a solution on the parties.

- The Board's longstanding voluntary, formal mediation process focusses on discussions guided by a neutral, unbiased mediator.
- Board members continue to resolve cases through active but informal intervention, in case management conferences, and through the blending of mediation and adjudication processes.

Administering collective bargaining

- The Board administers collective bargaining processes for the federal public sector (including the RCMP and Parliament), as covered by the *FPSLRA* and the *PESRA*.
- Federal public sector agreements often serve as benchmarks that shape the standards and expectations of the labour market as a whole.
- The Board reviews and supports collective bargaining in many ways, including:
 - » certification of new bargaining units;
 - » determination of proposed changes to bargaining units;
 - » dealing with bargaining unit exclusions and essential services disputes;
 - » administering interest arbitration boards;
 - » dealing with complaints related to unfair labour practices, such as bad faith bargaining, and failures to provide fair representation.

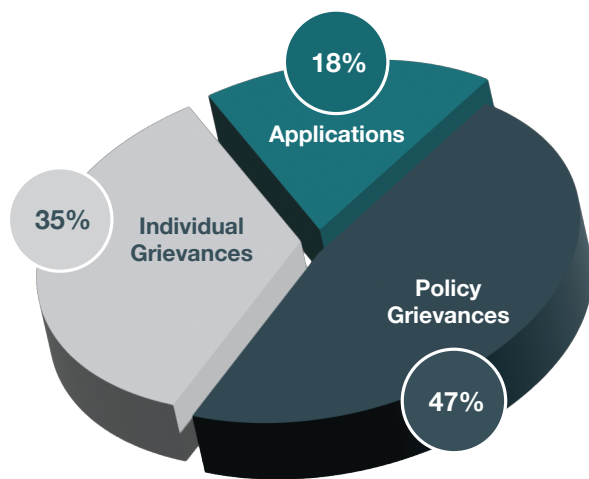
The Board's Performance

During the 2024-2025 fiscal year, the Board has continued its progress in reducing its file inventory by once again closing more files than were opened.

Files Received

In 2024-2025, 17 new files were referred under the *PESRA* – 8 policy grievances, 6 individual grievances (3 relating to the interpretation or application of a collective agreement, 2 termination grievances, and 1 disciplinary matter), and 3 applications.

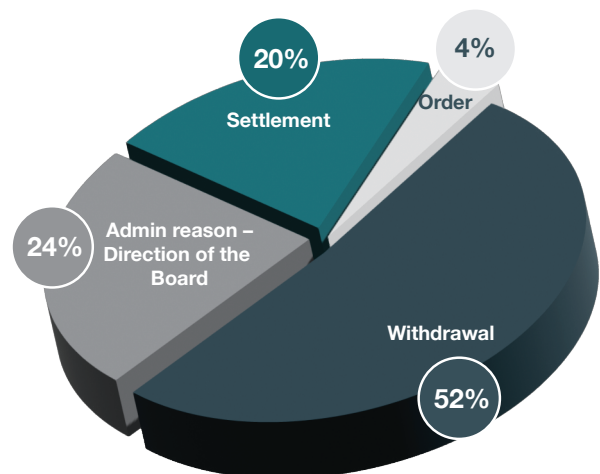
New files referred under the *PESRA* in 2024-2025



File Closures

In 2024-2025, 25 files under the *PESRA* were closed. Of those, 13 were withdrawn, 5 were settled between the parties, 1 was closed due to an order being issued, and 6 were closed at the direction of the Board. The net clearance rate for the 2024-2025 fiscal period stands at 147%, showing that the inflow and management of *PESRA*-related files continues to be manageable.

File closure reasons, 2024-2025



Overview of the case file inventory

Thirty-two (32) files were carried forward from the previous fiscal year. With the 17 new referrals and 25 closures this year, 24 files will be carried forward into the next fiscal year. These 24 files consist of 15 individual grievances, 6 complaints, 2 applications, and 1 policy grievance.

Of the 24 files being carried over to the next fiscal year, 13 involve the Parliamentary Protective Services, 5 involve the Senate, 5 involve the Library of Parliament, and 1 involves the House of Commons.

Files carried forward, received, and closed under the *PESRA* from April 1, 2021 to March 31, 2025

Fiscal Year	Carried forward from previous year	Total new	Closed	Carried forward to next year
2021-2022	66	4	21	49
2022-2023	49	6	23	32
2023-2024	32	10	12	32 ¹
2024-2025	32	17	25	24

¹ The 2023-2024 annual report stated that 30 files would be carried forward. After data validation this year, that number was corrected to 32 files due to a system reporting error.

Number of hearings scheduled

In the 2024-2025 fiscal year, there were a total of 7 hearings scheduled for cases under the *PESRA*, representing 5 cases (two cases each had two hearings scheduled during the year due to the first being postponed). Of the five cases scheduled for hearing, 1 was held and 4 did not proceed to hearing. Of the 4 that did not proceed to hearing, 2 were withdrawn and 2 were settled.

Resolutions prior to a hearing can occur for several reasons such as settlements or settlement discussions, withdrawals, or other reasons such as longer than expected pre-hearing preparations, or the unexpected unavailability of a party or a witness.

The hearings scheduled were for cases related to individual grievances – all related to collective agreement grievances except for one classification grievance. They were also all files involving Parliamentary Protective Services, except for one case (two files) involving House of Commons.

Mediation

Two (2) mediations were held in 2024-2025, and both resulted in a settlement.

Collective Bargaining

In the 2024-2025 fiscal year, the Board established one arbitration board at the request of the parties, and one arbitration board started its work in fiscal year 2023-2024 and completed it in this reporting year. In June 2024, one group reached a tentative agreement with the assistance of mediators of MDRS, not requesting for the establishment of an arbitration board. The arbitration board established in 2024-2025 will complete their work in the next fiscal year.



The open court principle

The open court principle is a fundamental element of the Canadian justice system and is a hallmark of democratic societies. It ensures the transparency and accountability of the judicial system by providing the public the right to observe the process and access the records.

In accordance with the open court principle, the Board's hearings are open to the public, except in unusual circumstances. The Board follows its own ***Policy on Openness and Privacy*** to foster transparency in its processes, as well as accountability and fairness in its proceedings.

Moving Forward

The Board enters the coming year with clear momentum and a strong record of achievement. Over the past 2 years, we have successfully managed an expanding and increasingly complex caseload, consistently delivering meaningful results for the parties that we serve.

These outcomes are the product of focused innovation and an unwavering commitment to service excellence and access to justice in the federal public sector. Through the modernization of our facilities, the adoption of advanced data analytics, and continuous improvements to our processes, we have elevated the quality, efficiency, and responsiveness of our services.

Looking ahead, the Board is well placed to build on recent progress and to continue to adapt to the evolving needs of Parliament employees. Sustaining this momentum will require the ongoing support of the necessary financial and human resources, as well as maintaining a full complement of Board members, to deliver at our current level of excellence. By leveraging both new and proven processes, maintaining open and constructive engagement with stakeholders, and drawing on the lessons of recent years, the Board will remain responsive, innovative, and committed to ensuring meaningful access to justice for all parties.



Key decision

Library of Parliament v. Public Service Alliance of Canada, [2025 FCA 42](#)

This judicial review decision concerned the arbitral award in *Public Service Alliance of Canada v. Library of Parliament*, [2023 FPSLRB 91](#). Interest arbitration is a form of binding arbitration that allows parties to settle the terms and conditions of a collective agreement after negotiations result in an impasse. The arbitral award at issue concerned the collective agreements of two bargaining units at the Library of Parliament: the Library Science (Reference) and Library Science (Cataloguing) Sub-groups in the Research and Library Services Group bargaining unit (LS), and the Library Technician Sub-group in the Research and Library Services Group and all employees in Clerical and General Services (CGS-LT).

On judicial review, the Court noted that interest arbitration is driven by the replication principle. Interest arbitrators are afforded wide discretion to settle the terms of the parties' collective agreement. The Court stated that its role was not to re-weigh the evidence and that it was especially true in the context of interest arbitration.

The court found that many of the portions of the arbitral award that the Library of Parliament was contesting, including wage adjustments, fell within the range of reasonable outcomes with respect to maintaining the status quo.

However, regarding telework and remote work provisions, the Court found that the Board failed to address jurisdictional objections raised by the Library of Parliament. In its written and oral submissions to the Board, the Library of Parliament objected to the inclusion of a telework and remote work provisions in the arbitration, alleging such a provision exceeded the jurisdiction of the Board pursuant to subsections 5(3) and 55(2) of the *Parliamentary Employment and Staff Relations Act*. These subsections circumscribe the Board's jurisdiction, preserving certain rights of management and prohibiting certain matters from being dealt with in arbitration.

The Court found that the Board's decision to remit the telework and remote work provision to the parties for further negotiation with specific directives, and to remain seized of the matter for 90 days in the event that the parties did not come to an agreement, was unreasonable as it did not meaningfully consider a central argument.

The Court stated that the Board's task was to address the question of jurisdiction by providing a statutory interpretation of subsections 5(3) and 55(2) of the *Parliamentary Employment and Staff Relations Act*. By not doing so, the Court was left with no ability to review the Board's exercise of jurisdiction with respect to the telework and remote work provision.

The matter was remitted to a differently constituted panel of the Board, solely on the issue of jurisdiction with respect to the telework and remote work provision.