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

EXCELLENCE IN RESOLUTION

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

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

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 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.

For the second consecutive year, the Board closed more files than it opened — a reflection of sustained progress in managing our workload and reducing delays. Notably, the average age of files was significantly reduced, from 44 months in 2023-2024 to 34 months this year, while the active file age shifted from 31 to 29 months. These results are a testament to the dedication and professionalism of the Board members and Secretariat staff.

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)

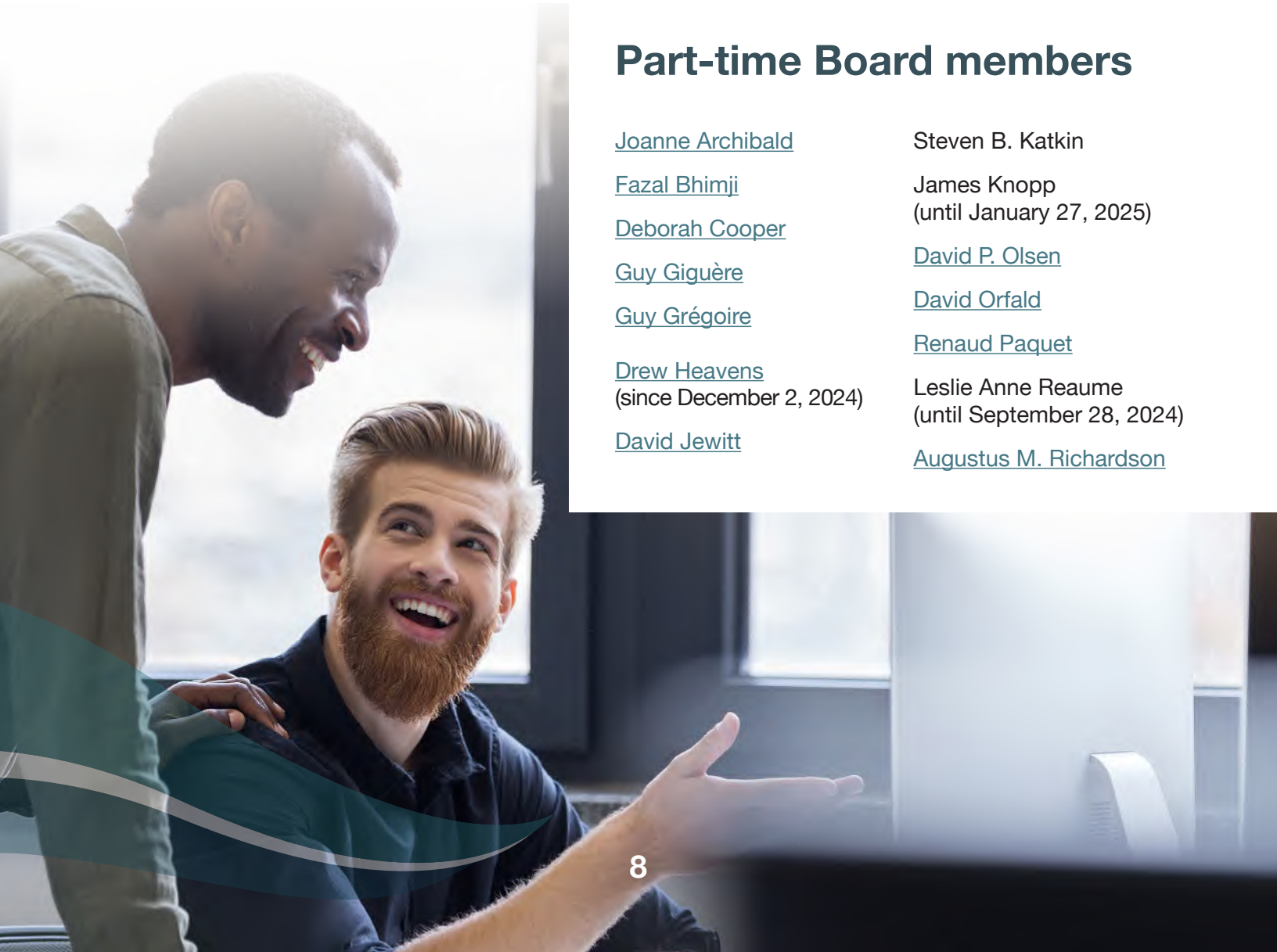
David P. Olsen

David Orfald

Renaud Paquet

Leslie Anne Reaume (until September 28, 2024)

Augustus M. Richardson



The Board's Mandate, Commitment, and Jurisdiction

The Federal Public Sector Labour Relations and Employment Board ("the Board") is an independent, quasi-judicial statutory tribunal dedicated to fostering fair and harmonious labour relations and employment environments in the federal public sector. The Board is mandated by statute to interpret and apply various labour and staffing-related legislation and provides the impartial resolution of workplace disputes and facilitates the equitable and timely settlements of work-related issues.

The Board's mandate includes:

- administering federal public sector collective bargaining and adjudication processes;
- resolving complaints about internal appointments, appointment revocations, and layoffs;
- resolving grievances related to collective agreement interpretation disputes;
- resolving human rights issues arising in labour relations grievances, staffing complaints, unfair labour practices, and collective bargaining matters;
- administering federal public sector reprisal complaints under Part II of the *Canada Labour Code (CLC)*; and
- resolving complaints made by federal public sector and parliamentary employees related to the *Accessible Canada Act*, which establishes a framework for the proactive identification, removal, and prevention of barriers to accessibility for persons with disabilities.

The Board interprets and applies the following legislation:

- *Federal Public Sector Labour Relations Act (FPSLRA)*
- *Public Service Employment Act (PSEA)*
- *Canadian Human Rights Act (CHRA)*
- *Parliamentary Employment and Staff Relations Act (PESRA)*
- *Public Sector Equitable Compensation Act (PSECA)*
- *Canada Labour Code (CLC),* Part II
- *Accessible Canada Act (ACA)*

The ***FPSLRA*** applies to departments listed in Schedule I to the *Financial Administration Act (FAA)*, other portions of the core public administration listed in Schedule IV, and the separate agencies listed in Schedule V. The *FPSLRA* covers over 325 000 federal public sector employees, including Royal Canadian Mounted Police (RCMP) members and reservists, and 81 bargaining units, represented by 26 bargaining agents, are certified by the Board.

The ***PSEA*** applies to any organization for which the Public Service Commission (PSC) or its delegate has the authority to make appointments and covers approximately 274 000 employees and managers in the federal public service.

The Board's Work

Positive labour relations 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 practices. The Board's work not only benefits the federal sector but also contributes to the broader evolution of labour relations across the country.

Resolving grievances, staffing complaints, and other disputes

- The Board adjudicates grievances, staffing complaints, and a variety of other matters through both oral and written hearings.
- All parties are given an equal opportunity to present evidence, make submissions, and be heard throughout the process.
- Board members render decisions that are impartial, well reasoned, and grounded in a thorough review of the facts and submissions.

Providing other pathways to resolution

- The Board offers informal resolution processes, such as mediation, early resolution intervention, and settlement conferences, giving parties greater control over outcomes.
- These approaches are typically faster, less costly, and more private than formal hearings and allow parties to address sensitive matters with confidentiality.
- Mutually agreed settlements often lead to more satisfactory results for all involved and eliminate the need for an imposed decision.
- Informal processes encourage open dialogue, cooperation, and respectful communication between parties and help restore relationships.
- By making these alternatives available, the Board enhances access to justice and helps ensure that disputes are resolved in a fair and timely manner.

Administering collective bargaining

- The Board is responsible for administering the collective bargaining process for the federal public sector, including the RCMP and Parliament, as set out in the *FPSLRA* and *PESRA*.
- This includes certifying new bargaining units, considering requests for changes to bargaining units, and dealing with bargaining unit exclusions and essential-services disputes.
- The Board administers public interest commissions (PICs) and interest arbitration boards, which help resolve impasses that arise during negotiations.
- It also addresses complaints related to collective bargaining, such as allegations of unfair labour practices, bad-faith bargaining, or failures to provide fair representation.
- Because federal public sector collective agreements often serve as models, the Board's work in collective bargaining helps set standards for labour relations across Canada.
- Throughout, the Board ensures that bargaining processes are fair, transparent, and compliant with legislative requirements.

The Board's Challenges

In 2024-2025, the Board operated within a demanding and evolving environment, marked by continued pressures on its caseload and the ongoing need to deliver timely and effective dispute resolution and adjudication services. The diversity and complexity of matters before the Board required ongoing attention to file management and process efficiency, as well as flexibility in responding to emerging issues across both labour relations and staffing domains.

Capacity was also affected by a six-month vacancy in one of the Board's two vice-chairperson positions and a reduced complement of part-time Board members. These gaps required careful planning and prioritization to maintain hearing schedules and service levels, while ensuring that all files continued to move forward.

The Board remained focused on stabilizing and consolidating recent initiatives, ensuring that improvements in intake coordination, early resolution, and alternative dispute resolution were fully integrated into day-to-day operations. Balancing these innovations with a steady pace of intakes and closures was essential to maintaining service levels and managing expectations.

The year also brought shifting operational realities within the federal public sector. These changes impact the Board and shape the context in which the Board delivers its mandate. Navigating these challenges calls for sustained commitment and adaptability, as the Board works to uphold its role in providing the accessible, impartial, and effective resolution of workplace disputes.

In the last reporting period, the Board also received 186 new files related to the Canada Emergency Response Benefit and COVID-19-pandemic-related relief terminations. Stemming from the pandemic relief programs, several hundred employees were reported in the news as having been terminated due to their alleged receipt of money from pandemic relief programs. Many of the new files received relate to terminations and revocations of security clearances. The Board has begun assigning and treating these matters and will closely monitor the influx of these types of files in the future, to ensure that the best approach is taken to address them promptly and efficiently.

The Board's Solutions

A full complement of Board members

Throughout the year, the Board benefited from a robust complement of full-time members. This strengthened our ability to manage our caseload, despite a vacancy in the vice-chairperson role and among part-time members, and improve our scheduling and hearing capacity, and it enabled us to deliver timely and effective service to all parties. Maintaining a complete team has played a key role in advancing our mandate and supporting high-quality service for the parties before the Board.

Improved technology

Throughout 2024-2025, the Board adapted to a modernized technological infrastructure, to better support the parties and improve access to justice. Some of the Board's hearing rooms in the National Capital Region have been equipped with advanced audio-visual systems and the latest digital technologies to better support hybrid and in-person proceedings and offer a high-quality experience for the parties, whether they attend remotely or onsite.

In addition, the Board advanced its digital transformation by significantly improving its electronic documents portal. The portal now provides a more intuitive and secure platform for parties to share documents both with the Board and with each other. These improvements have streamlined the document exchange process, reduced the administrative burden, and enabled the real-time sharing of materials during hearings.

Together, these upgrades have strengthened the Board's ability to deliver efficient, flexible, and accessible services and underscore its commitment to modern, client-focused dispute resolution.

Increased hearing availability

The pace of scheduled hearings has generally increased, rising from a total of 506 in 2022-2023 to over 700 per year in both 2023-2024 and 2024-2025, despite a slight decrease year to year due to vacant positions during the reporting year. The Board is seeking to maintain this level of scheduling, to ensure the significant resolutions of disputes, in tandem with other dispute-resolution tools.

Strategic use of informal resolution processes

In line with prior years, the Board continues to use informal dispute-resolution mechanisms, to keep the parties engaged, talking, and resolving their disputes. This includes ongoing meetings with stakeholders and using settlement conferences, mediation, and early-resolution outreach to advance matters to a satisfactory resolution for all parties involved.

Transparent and targeted scheduling and case management

Using lessons learned from prior years, the Board ensures that high-impact issues are treated with the urgency required, all while ensuring a steady volume of service delivery in other areas of the caseload. This means engaging the parties in case management, to provide the best level of strategic, targeted scheduling and to ensure the greatest breadth of service to our respected parties. Be it broad discussions or tailored service, the Board will continue to offer its expertise in a transparent, targeted, and efficient manner.

Written submissions

Written submissions have become more common in our processes, particularly at the initial stages of our complaint and grievance processes. Written submissions provide the Board with the flexibility to advance matters in a targeted way by addressing key preliminary issues in advance, and often lead to the resolution of the file.

The Board's Performance

2024-2025 in Numbers

(See Appendix 2 for more Details)

In 2024-2025, the Board continued to make significant progress in managing its caseload and advancing its mandate. For the second consecutive year, the Board achieved a positive clearance rate, closing more files (2674) than it received (2468), resulting in a net reduction of 206 files in its inventory. This performance reflects an increase of 19.1% in closures despite a 10.6% rise in new filings compared to the previous fiscal year.

Labour relations files

Labour relations files once again made up the bulk of the Board's workload, with 2020 files referred in 2024-2025, up from 1853 the previous year. The Board closed 2256 files in this category, exceeding both the intake and the prior year's total of 1810 closures.

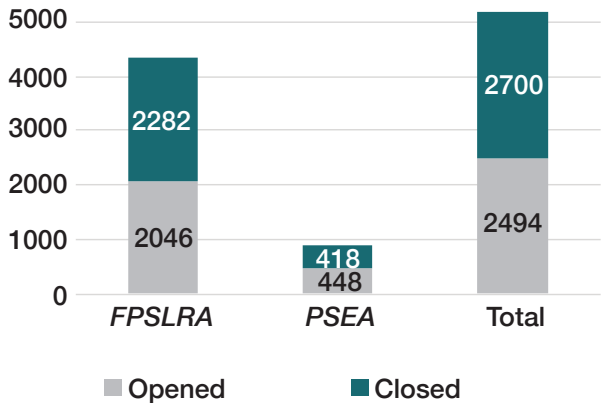
Files withdrawn before a decision comprised 71.1% of all closures, with more than 1000 files closed. Settlements represented 46.5% of all withdrawals, illustrating the continued impact of early intervention, case management, and resolution tools in reducing delays and promoting constructive outcomes.

Staffing files

In 2024-2025, 448 staffing complaints were made with the Board, compared to 378 in 2023-2024. This increase is an indication that the staffing landscape is changing. It is the second consecutive year in which the number of staffing complaints increased, marking a significant shift from the previous years, during which the number of files steadily declined. Closures totaled 418 for the fiscal year, compared to 436 in 2023-2024.

For the first time in 8 years, the number of complaints received overtook the number of complaints closed, which the Board will focus on in the coming year as it seeks to re-establish an equilibrium.

Files opened and closed, 2024-2025

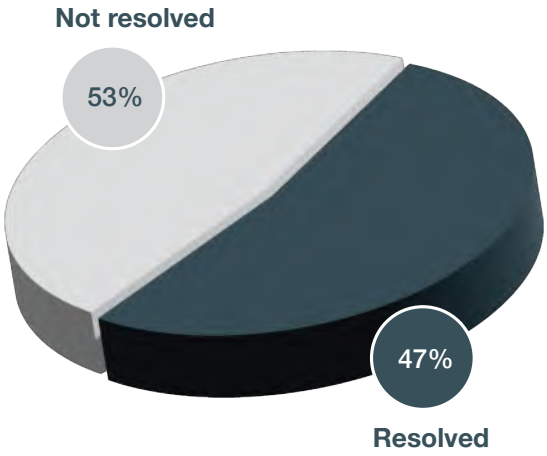


Hearings

In 2024-2025, the Board sustained a high volume of hearing activity; it scheduled a total of 737 hearings under the *FPSLRA* (626) and *PSEA* (111). While this marks a slight decrease from the previous year, it is the second consecutive year in which the Board has maintained more than 700 hearings, which threshold had never been reached before.

Settlement conference outcomes

In 2024-2025, the Board completed **78 settlement conferences**, with **37 resulting in resolution**, yielding a **47% settlement rate**. These conferences remain an important tool to help parties resolve matters without the need for a formal hearing.



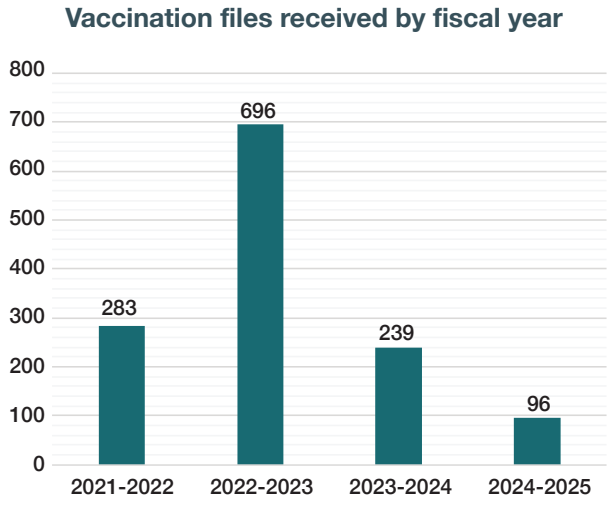
Formal mediation outcomes

In 2024-2025, Board mediators conducted 138 formal mediation interventions, helping parties resolve a broad range of disputes. The settlement rate was 73% for labour relations matters and 64% for staffing complaints, reflecting the continued effectiveness of mediation in supporting timely, mutually agreed outcomes.

COVID-19-vaccination-policy grievances

The number of COVID-19-vaccination-related grievances continued to decline in 2024-2025. The Board received 96 new files and closed 52, bringing the total inventory of vaccination-related grievance files to 1314. As the volume of new cases continues to decrease, the Board is working to advance the adjudication of the remaining matters.

A large number of vaccination-related files are being held in abeyance pending the Federal Court's decision in *Rehibi v. Deputy Head (Department of Employment and Social Development)*, 2024 FPSLREB 47. The Board has developed a written submissions process for vaccination-related files that also raise religious accommodation issues, as outlined in *Bedirian v. Treasury Board (Department of Foreign Affairs, Trade and Development)*, 2024 FPSLREB 58. These files, along with medical accommodation vaccine files, continue to be resolved.



Decision timeliness average

In the 2024-2025 fiscal year, 51% of decisions were issued within 6 months of the hearing (labour relations, 54%; staffing, 36%). Of the remaining decisions, 34% were issued between 6 to 12 months after the last hearing date (labour relations, 29%; staffing, 60%), and 14% were issued more than a year after the hearing (labour relations, 15%; staffing, 14%). Additionally, 2 decisions under the *FPSLRA* were issued without a hearing or written submissions.

	FPSLRA		*PSEA*		TOTAL	
	Number	Cumulative Percentage	Number	Cumulative Percentage	Number	Cumulative Percentage
Issued within 6 months*	74	55%	9	36%	83	51%
Issued between 6 and 12 months**	40	29%	15	60%	55	34%
Issued more than a year***	21	15%	1	4%	22	14%
Issued without a hearing	2	1%	0	0%	2	1%
Total	137	100%	25	100%	162	100%

Average file age (in months)

The average file age is the period from a file's creation to the end of the current reporting period, i.e., March 31, 2025. An **active case** file is currently in mediation, is awaiting a decision, is awaiting the parties' submissions, is waiting to be scheduled for a hearing, or has already been scheduled for a hearing. An **inactive case file** is held in abeyance or is awaiting final withdrawal.

The average age of active labour relations cases decreased slightly, to 29 months in 2024-2025 from 31 months the previous year.

In terms of broader movement in our inventory of files, the overall average age of active and inactive files dropped from 44 months in 2023-2024 to 34 months. The Board also undertook a large withdrawal closure of inactive files, in collaboration with the associated parties.

Meanwhile, for staffing case files, the active file age decreased significantly to 13 months from 17 months the previous year. This marks a continued downward trend in active file age of staffing files, as it has gone down from 21 months in 2022-2023 and 22 months in 2021-2022, in part due to our Staffing Case List that continues to be used, giving complainants, their representatives, and the respondent parties a clear view of what cases will be scheduled in the next cycle and effectively reduces the waiting period for staffing hearings.

Clearance rate

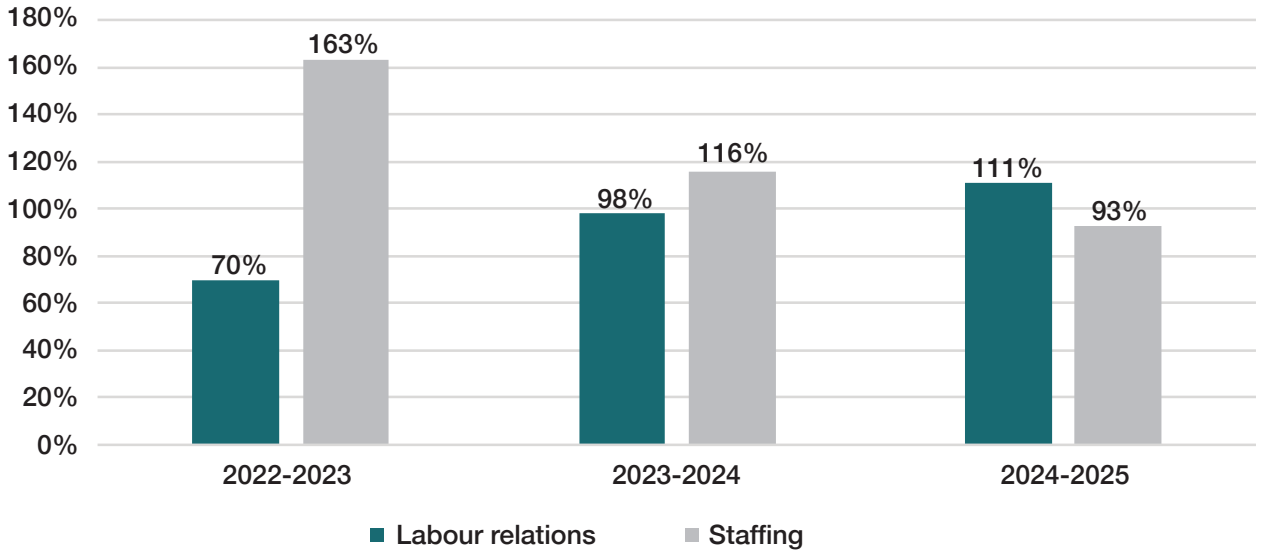
The Board achieved a positive overall clearance rate in 2024-2025, marking the second time in 3 years that more files were closed than received.

Compared to 2023-2024, labour relations clearance improved from 98% to 111%, while staffing decreased from 116% to 93% but remained close to equilibrium. These results reflect the continued impact of targeted scheduling, increased hearings, and the expanded use of alternative dispute-resolution mechanisms on overall file management.

Number of reasons for decision issued

In the past fiscal year, the Board issued 162 reasons for decisions in both official languages. Of that number, 137 dealt with labour relations matters, and 25 dealt with staffing matters. This represents a 30% increase from the 125 decisions issued the previous fiscal year. Reasons for decisions that are issued sometimes address multiple files. For example, if the Board receives multiple files from the same bargaining agent that address the same topic, it may hear them simultaneously, and only 1 decision will be issued for all those files. As a result of the 162 reasons for decisions issued, 215 files were closed (189 labour relations and 26 staffing).

Clearance rates as of March 31, 2025



Highlights of 2024-2025

Collective bargaining

In the 2024-2025 fiscal year, some bargaining units completed bargaining to renew their collective agreements under the *FPSLRA*. Over the period, the Board's Mediation and Dispute Resolution Services (MDRS) assisted the Board in 8 distinct bargaining processes under the *FPSLRA* involving 3 public-sector employers and 8 bargaining agents.

In total, MDRS conducted 4 mediations, and the Board established 4 public interest commissions (PICs) and 4 arbitration boards.

Phoenix-related files

The Board had 590 files related to the Phoenix pay system in its inventory by the end of the 2024-2025 fiscal year. These included new files related to pay-recovery grievances. As well, Phoenix claims have begun proceeding through the new expedited adjudication process launched by the Board, with 15 claims filed and 4 closed in the fiscal year. As pay-system-related grievances continue to evolve, the Board is engaging the parties to ensure that resolutions are achieved by any means necessary.

The Board's outreach and training efforts

In 2024-2025, the Board continued to engage actively with stakeholders, professional communities, and the broader labour relations network in Canada and beyond.

The Chairperson delivered a presentation to the executive of the Labour and Employment Law Section of the Canadian Bar Association and participated as a panelist at the Association of Labor Relations Agencies (ALRA) annual conference. She also maintained her involvement in the Labour Board Chairs group, taking part in its annual meeting. Board Member Christopher Rootham served as the co-chair of the 2024 Lancaster House Ottawa Labour Law Conference. In addition, several Board members took part in community events and professional gatherings throughout the year, which reinforced the Board's presence and connections within the labour relations community.

Through MDRS, the Board also delivered targeted training and outreach to support the effective use of its processes. In 2024-2025, MDRS facilitated two presentations to participants at the ALRA conference, provided one mediation training session to a university in English, delivered two presentations to law societies, and conducted five training sessions for stakeholders on how to participate in mediation at the Board (one in French, and four in English). MDRS also held three information sessions on the Early Resolution Officer program.

Early Resolution Program

During this fiscal year, Early Resolutions Officers (EROs) conducted facilitated discussions between the parties in 201 files, from which 117 files were referred to the Settlement Conference process, and 31 files were referred to mediation. In addition, 28 files were referred to a case management discussion, 4 files proceeded by way of written submissions, and 21 files were referred to a hearing.

Legislative Changes that Impact our Mandate

The open court principle

The open court principle is a cornerstone of the Canadian justice system and a defining feature of democratic societies. It promotes transparency and accountability by granting the public the right to observe proceedings and access court records.

In keeping with this principle, the Board's hearings are open to the public, except in exceptional circumstances. The Board adheres to its *Policy on Openness and Privacy*, which is designed to support transparency, fairness, and accountability throughout its processes.

In 2024-2025, the Board received 35 open court requests and released a total of 40 539 pages of documents.

Moving Forward

The Board enters the coming year with clear momentum and a strong record of achievement. Over the past 4 years, we have successfully managed an expanding and increasingly complex caseload, consistently delivering meaningful results for the parties that we serve. With more than 700 hearings scheduled annually and a record number of files closed, we have achieved a sustained reduction in our largest and most challenging inventory, all while upholding the highest standards of fairness and impartiality.

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 the federal public sector. Sustaining this momentum will require the ongoing support of the necessary 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 decisions issued by the Board

Labour relations

Milinkovich v. Treasury Board (*Department of Transport*), 2024 FPSLREB 50

Labour relations – Individual grievances – Collective agreement – Border services officer – Human Rights – Discrimination – Family status – Accommodation – Exceptions to the doctrine of *stare decisis*

The grievor and his spouse, both Transport Canada inspectors, worked 12-hour shifts. When the employer changed their work schedules, the grievor sought an accommodation based on family status due to childcare responsibilities. The employer denied the accommodation on the ground that the grievor was required to attempt to reconcile any conflicts between work and childcare obligations before approaching it with a workplace accommodation request.

At adjudication, the grievor argued that the Board should depart from the test in *Canada (Attorney General) v. Johnstone*, 2014 FCA 110 on the basis of two narrow exceptions to the doctrine of *stare decisis* and instead apply the uniform *prima facie* test for discrimination set out by the Supreme Court of Canada *in Moore v. British Columbia (Education)*, 2012 SCC 61. The Board held that it was not able to depart from the precedents in *Johnstone, Flatt v. Canada (Attorney General)*, 2015 FCA 250, and *Tarek-Kaminker v. Attorney General of Canada*, 2023 FCA 135.

Applying the test in *Johnstone* on the merits, the Board found that the grievor established that he had childcare obligations and that the childcare needs flowed from a legal obligation as opposed to personal choices. However, the evidence did not show that the grievor made any serious attempt to reconcile any conflicts between his work and childcare obligations. The Board also applied the test in *Moore* to its conclusions of fact, finding that the grievor had a protected characteristic, but did not suffer an adverse, employment-related impact.

Consequently, the grievance was dismissed.

***Bedirian v. Treasury Board (Global Affairs Canada)*, 2024 FPSLREB 58; *Lemay v. Treasury Board (Department of Public Safety and Emergency Preparedness)*, 2024 FPSLREB 175**

Labour relations – Individual grievance – Policy on COVID-19 Vaccination for the Core Public Administration Including the Royal Canadian Mounted Police ("the vaccine policy") – Discrimination – Human rights – Religion

Both grievors grieved the employer's denial of their request for accommodation on religious grounds from the *Policy on COVID-19 Vaccination for the Core Public Administration Including the Royal Canadian Mounted Police* ("the vaccine policy").

At the time of these decisions, there were over 350 religious accommodation grievances active with the Board related to the vaccine policy. To ensure this volume of cases can be resolved, the Board introduced a written procedure to handle these grievances, and these cases were the first to follow that process. The written procedure involved evidence submitted via a Board-designed form and affidavit; cross-examination offered in writing using a structured form; and the submission of written arguments by both parties. Following this written procedure, neither the Board nor the parties identified any evidentiary gaps that needed to be filled with oral evidence.

In both cases, the Board applied the two-part test from *Syndicat Northcrest v. Amselem*, 2004 SCC 47: the belief must have a nexus to religion and be sincere.

In *Bedirian*, the grievor claimed discrimination on four grounds, which he maintained were connected to his religion: (1) he was religiously required to follow his conscience, and therefore, it would have been against his religion to receive a vaccine if he did not want to; (2) he must treat his body as God's temple of the Holy Spirit; (3) fetal cell lines were used in developing the COVID-19 vaccines; and (4) all vaccines violate his religion because they suggest that God is imperfect. The Board dismissed the first ground because it was a conscientious objection to the COVID-19 vaccine that did not have the required nexus with religion. On the other grounds, the Board found that the grievor did not demonstrate the sincerity of his religious beliefs: he gave no details of his current religious beliefs or practices, his evidence was inconsistent, and he became vaccinated before being placed on leave without pay. He provided no evidence that this reluctance to be vaccinated is sincerely part of a comprehensive system of faith. That grievance was dismissed.

In *Lemay*, the greivor's belief was stated as this: "My faith dictates that I cannot use medicine, in this case a vaccine, when it is not absolutely necessary to sustain my life, as it shows no faith in God's power to heal", and this: "I treat my body as God's temple …". Labour arbitrators have concluded that there is a nexus between that belief and religion, and the Board was given no compelling reason not to follow that line of authority. The grievor's belief was consistent with his current religious practices that involve a particular and comprehensive system of faith and worship. Nothing in the record suggested that he was untruthful or that his claim was mere artifice. *Amselem* also provides that the interference with the religious practice or belief must be more than trivial or insubstantial. The grievor was faced with the choice of getting vaccinated or being held out of his job. He chose not to get vaccinated and was held out of his job as a result. It was more than a trivial interference with his sincere religious beliefs. Accordingly, this grievance was allowed. As requested by the parties, the issue of remedy was bifurcated.

Treasury Board v. Federal Government Dockyards, Trades and Labour Council (Esquimalt, B.C.), 2024 FPSLREB 84

Labour relations – Application for a declaration of unlawful conduct under s. 198(1) of the *Federal Public Sector Labour Relations Act* (S.C. 2003, c. 22, s. 2; "the *Act*") – Strike – Picket line

The applicant made an application for a declaration of unlawful conduct under s. 198(1) of the *Act*, alleging that the respondent counselled the members of the bargaining unit that it represents to carry out strike action, in violation of s. 194(1) of the *Act*.

The respondent is a council of employee organizations certified as the bargaining agent for the bargaining unit that includes the Ship Repair employees working at the Department of National Defence's naval repair facilities in British Columbia. Those ship repair employees are commonly referred to as SR(W)s. In April 2023, the Public Service Alliance of Canada, in the context of a legal strike, set up picket lines at two facilities where the SR(W)s work. The SR(W)s were not in a legal strike position and did not cross the picket lines.

The Board found that no unlawful conduct occurred. The respondent advised the SR(W)s to follow management's directions, which were either to cross the picket lines or take paid or unpaid leave. There was no strike within the meaning of the *Act*, as management allowed the SR(W)s to choose between reporting to work or taking leave. No concerted activity resulted from individual decisions not to cross picket lines in fear of negative consequences and confrontation. The respondent did not direct or counsel a strike by expressing its position on crossing picket lines.

Application dismissed.

Kemp v. Public Service Alliance of Canada, 2024 FPSLREB 87

Labour relations – Complaint – Duty of fair representation – Discrimination – Disability – Change of representative

The complainant filed a grievance, alleging that the employer discriminated against him on the basis of disability by not providing him with a safe and harassment-free workplace and that it violated the collective agreement article related to employees' performance reviews. At the third level of the grievance process, his representative changed, and the respondent withdrew its support. Therefore, he made a complaint, alleging that the respondent breached its duty of fair representation.

The Board found that the complainant did not demonstrate an arguable case that the respondent breached its duty of fair representation and dismissed the complaint.

The complainant alleged that the respondent acted arbitrarily and in bad faith when it did not inform him of the reasons for its decision to withdraw its support. The Board found that the respondent did not make a careless or an ungenuine assessment of the complainant's case. The representative reviewed all the documents that had been submitted and concluded that the grievance had no reasonable chance of success.

The complainant alleged that the respondent failed to provide him with information on the option to continue the process without its support. The grievance at the source of the complaint was against the interpretation and application of a collective agreement. The complainant was barred from continuing with it unless the respondent supported and represented him. Therefore, there was no failure on the respondent's part. As for other recourses, the Board noted from the complainant's documents that he seemed to be aware of some of them.

The complainant alleged that the respondent acted in bad faith and that it discriminated against him by refusing to acknowledge and consider his disability as a factor in his case, by denying him his requested accommodation of communicating with him mainly in writing and to assign a new representative to his case, and by treating him with disrespect and hostility. The Board analyzed the substantive and procedural aspects of the respondent's handling of the complainant's case. On the substantive aspect, the representative clearly explained that the main reason behind the respondent's decision to withdraw its support was that it did not believe that the evidence supported a discrimination allegation. The respondent also concluded that it would not be able to demonstrate that the complainant's performance assessment violated the collective agreement, as there was no evidence of discrimination by the employer based on his disability. The representative also considered the fact that the disability had not been disclosed to the managers assessing his work and that a neutral external consultant had reviewed the assessment.

On the procedural aspect, the complainant suggested that the respondent failed to respect his accommodation request to correspond exclusively in writing and to assign a new representative to his case. All the alleged facts and documents that fell within that 90-day complaint period did not demonstrate that the request was made during that time. After the request was made, communication was done in writing, as he had deemed necessary.

Finally, with respect to the allegation that the representative treated him with hostility, the Board found no such signs, only signs of disagreement between the complainant and the representative in their respective analyses of the case.

***Kline v. Deputy Head (Canada Border Services Agency)*, 2024 FPSLREB 115**

Labour relations – Grievance – Termination (disciplinary) – Negligence – Reinstatement – Compensation – Aggravated and punitive damages

The Canada Border Services Agency (CBSA) terminated the grievor, for disciplinary reasons. It alleged that her negligence resulted in a loss of duties in excess of $25 000 000 that it could have imposed against a company for the importation of certain products.

The Board found that nothing indicated that the grievor fulfilled her responsibilities negligently. It concluded that the employer did not prove misconduct or that the termination of her employment was warranted or for cause. The employer's disciplinary process was profoundly untimely. It failed to investigate the allegations. Further, the person who led the disciplinary process was directly implicated in the company's file in much the same way as was the grievor, but their oversight and override exceeded hers. Almost all the lost duties happened after the grievor had left and while the other executive was still in charge. The employer's failure to investigate also shielded others from liability and did not determine the true reasons for what happened with the lost duties.

The grievance was allowed and the grievor reinstated. The Board also awarded aggravated and punitive damages. The employer's disciplinary process showed a serious disregard for fairness and the resulting harm to the grievor was significant and long-lasting. The Board determined that an award at the high end of the typical range of aggravated damages was appropriate, in the amount of $35 000. The Board also found that the employer's bad faith in the disciplinary process merited an award of punitive damages. When it calculated the appropriate sum of punitive damages, the Board considered the deliberate, callous, sustained, and bad-faith nature of the employer's conduct in terminating the grievor. It made an award at the higher end of the range, in the amount of $75 000.

Public Service Alliance of Canada v. Canadian Security Intelligence Service, 2024 FPSLREB 120

Labour relations – Complaint under s. 190 of the *Federal Public Sector Labour Relations Act* (S.C. 2003, c. 22, s. 2) – Violation of the duty to bargain collectively in good faith under s. 106 – Interference with bargaining unit members' representation under s. 186(1)(a), and discrimination with respect to their employment, pay, or terms and conditions of employment under s. 186(2)(a)(i)

This was a complaint under s. 190 of the *Federal Public Sector Labour Relations Act*, alleging a violation of the duty to bargain collectively in good faith under s. 106, interference with bargaining unit members' representation under s. 186(1)(a), and discrimination with respect to their employment, pay, or terms and conditions of employment under s. 186(2)(a)(i).

The Public Service Alliance of Canada (PSAC) is the bargaining agent of the only bargaining unit within the Canadian Security Intelligence Service (respondent). All other employees are unrepresented. The parties reached a tentative agreement and approximately one week later it was announced that unrepresented employees would receive a "Temporary Recognition Lump Sum Payment" (TRLSP). The TRLSP was not extended to represented employees. The respondent took nearly eight months to ratify the tentative agreement and then another five months to finalize it.

The Board found that the respondent breached its duty to bargain in good faith when it delayed ratifying and signing of the collective agreement and by paying the TRLSP. Many of the terms and conditions granted to unrepresented employees were used as benchmarks for the negotiations. During negotiations, the respondent provided information on what terms and conditions had been implemented for the unrepresented employees, yet there was no dialogue concerning the sudden grant of the TRLSP. While there was no obligation to offer the TRLSP, there was an obligation to provide sufficient information to ensure rational informed discussions. There was no attempt to explain the timing of the TRLSP or why its rationale would not apply to represented employees. There was also no justification for the delays in finalizing the collective agreement, especially the time that elapsed between reaching a tentative agreement to the employer's ratification.

The Board also found that the respondent committed an unfair labour practice by undermining the relationship between the complainant and its members, which amounted to interference in the representation of employees, and that it discriminated against bargaining unit members with respect to their employment, pay, or terms and conditions of employment. The Board awarded the TRLSP to members of the bargaining unit, $100 to each bargaining unit member for the undue delay concluding the collective agreement and ordered that the decision be posted in a prominent location for a period of not less than 90 days.

Elsayed v. Canada Revenue Agency, *2024 FPSLREB 130*

Labour relations – Objection – Jurisdiction – Timeliness – Application for an extension of time granted – The "essential character" analysis of the grievance; it is about rate of pay – Pension

The applicant is a former employee who retired from the federal public service. He filed a grievance on October 22, 2022, contesting adjustments made to his pension that were retroactive to November 1, 2007, when he was still an employee. This decision dealt with the respondent's jurisdictional objection and the applicant's request for an extension of time.

The respondent argued that the grievance does not involve the interpretation or application of the collective agreement. The Board lacks jurisdiction to hear it because the determination of pension benefits, including the calculation and interpretation of pensions, falls under the authority of Public Services and Procurement Canada and the Government of Canada Pension Centre, which administers the Public Service Pension Plan in accordance with the *Public Service Superannuation Act*. The Board also lacks the authority to grant any of the requested remedies, which included that any future deductions from

the applicant's pension be stopped and that any amount deducted from the applicant's pension be repaid.

The Board found that it had jurisdiction to hear the grievance, since the grievance's essential character was about the rate of pay that was applicable at the relevant time. Rates of pay are referenced in the collective agreement, which is clearly within the Board's jurisdiction. The Board also dismissed the respondent's argument with respect to remedy. It found that the last remedy cited in the grievance is not specific to pensions but is a common catch-all phrase in grievances: "… any other measures be taken to make me whole." This could include correcting the grievor's rate of pay for the prescribed period, if the Board found that the employer violated the collective agreement or simply a declaration that the employer violated the rate of pay provisions of the collective agreement.

The Board also granted the applicant an extension of time to file the grievance in the interest of fairness. It found that the delay—just over five months—was justified by the complexity of retroactive pay adjustments spanning 14 years and the lack of timely information from both the employer and the bargaining agent. The applicant demonstrated due diligence throughout, and the Board concluded that the injustice of denying the grievance far outweighed any prejudice to the respondent, especially given the employer's own prolonged delay in correcting the pay error.

Accordingly, the respondent's jurisdictional objection was dismissed and the application for an extension of time was granted.

McNabb v. Treasury Board (Canada Border Services Agency), 2024 FPSLREB 143

Labour relations – Border services officer (BSO) with disability terminated following Canada Border Services Agency's (CBSA) claim that he rejected a reasonable accommodation

The grievor worked at a small port of entry in British Columbia. He suffered an injury that resulted in permanent physical restrictions, including that he could no longer use a firearm. He requested accommodation and, later, five years of leave without pay for the care of family. The grievor was ultimately terminated, and his leave request was denied. He alleged that the CBSA breached its duty to accommodate and that it terminated his employment without cause. He also claimed that the CBSA denied his request for leave without pay for the care of family in an arbitrary and discriminatory manner.

Accommodation requests at the CBSA are addressed using a concentric-circles model. Under that model, accommodation options are first investigated in the employee's position and work location; then, if needed, the search is expanded to include other work locations at the district and regional levels. According to the CBSA, there was not enough administrative work available at the grievor's port or those nearby. At the regional level, it identified and proposed a position in which an unarmed BSO could be accommodated, but it required the grievor to move. The CBSA also made a second accommodation offer, proposing lower-level positions. The CBSA claimed that the grievor rejected reasonable accommodations by rejecting the first offer and not responding to the second and that as such, his termination was reasonable.

The Board found that the CBSA's evidence was insufficient to support a finding that it met its duty to accommodate. The evidence demonstrated that the CBSA relied upon an initial and general impression that accommodating a permanently disabled BSO at a small port of entry was impossible. It did not take steps to ensure that that was true and did not present evidence to the Board to establish that that was so. The evidence presented at the hearing was also insufficient to establish that the accommodation offers that the CBSA made were reasonable or that the grievor rejected them. He responded to the first offer, raised concerns, asked questions, and requested more time to consider it. He did not receive a response. After the second offer, he filed a grievance. The grievance constituted his response to the accommodation offer and signaled that he believed that the CBSA was failing its duty to accommodate.

The Board also commented on the employer's lack of compassion for the grievor during the accommodation process. Although a person requiring accommodation is not entitled to an accommodation that is tailor-made to his or her needs or priorities, it does require consideration of the individual's dignity and personal circumstances. In this case, the employer did not consult the grievor about his needs and imposed tight deadlines for decisions that could significantly affect his life and family. The accommodation process was treated as a bureaucratic task rather than a human-centered effort, with decisions made by individuals unfamiliar with the grievor's situation. This led to an overall impression of a process lacking empathy and genuine concern for the grievor.

For the leave without pay for the care of family, the Board concluded that the CBSA did not seriously consider the grievor's request and that it was denied, at least in part, because he had been on leave without pay due to his disability, and the employer did not want to further extend the period of leave without pay. The denial of the request was also arbitrary and based on the employer's erroneous interpretation of the terms of the collective agreement in that it believed that the grievor could not combine a sick leave without pay with a leave without pay for the care of family.

As such, the grievances were allowed. At the parties' request, the Board bifurcated the issue of remedies.

Staffing

***Harnois v. Deputy Head (Deputy Minister of Transport, Infrastructure and Communities)*, 2024 FPSLREB 106**

Staffing – Advertised process – Application of merit – Reasonable apprehension of bias – References – Insufficient information – Manager's credibility – Recommendations – Corrective measures – Declaration of abuse of authority – Second hearing to be held, on damages

The complainant made a complaint about two advertised appointments. She alleged that the respondent abused its authority when it assessed her application and that it was biased when it used references to assess the "Teamwork" qualification. She also argued that the ability to work with co-workers was already assessed by the "Effective Interpersonal Relationships" qualification.

The respondent argued that the information available to the selection board allowed assessing the complainant's qualifications fairly and impartially, that the information obtained from the references did not demonstrate that she met the "Teamwork" qualification, and that the "Effective Interpersonal Relationships" qualification allowed assessing only the ability to work with the public.

The Board concluded that the ability to work with co-workers was already assessed by the "Effective Interpersonal Relationships" qualification and that the selection board was biased which is a form of bad faith, when it assessed references for the "Teamwork" qualification. In addition, the Board found that the respondent assessed the "Teamwork" qualification based on insufficient information.

It also determined that the selection board abused its authority by adopting a rigid rule that prevented it from recognizing that the instructions to candidates and referees had serious flaws and by failing to take steps to mitigate the impact of its error. Thus, the Board found that the acting manager abused his authority by being biased in his assessment of the referees' answers for the "Teamwork" qualification.

The Board recommended that the respondent review its operating methods, to regularly include human resources advisors on selection committees or that they be consulted at the reference stage and in assessing them. It also recommended that manager training be reviewed to focus more on the types of abuse of authority identified in the jurisprudence.

As corrective measures, the complainant requested a declaration of abuse of authority and damages in the amount of $35 000 for moral damages, such as the damage to her reputation and the impact on her psychological health, as well as punitive damages. The Board declared an abuse of authority because revoking the appointment was not appropriate, as there was no indication that the appointees did not meet the merit criteria. As for the damages claim, the Board considered that the circumstances of this case were so particular and the abuses of authority so flagrant that the claim required serious consideration. It believed that the parties should return for a second hearing on the possibility of awarding damages as a corrective measure in this grievance.

Bolton v. Deputy Head (Department of Justice), 2024 FPSLREB 165

Staffing – Complaint – Advertised internal appointment process – Abuse of authority – Reasonable apprehension of bias – Assessment of complainant – Interview – Harassment complaint – Recommendations – Corrective measures – Declaration

The complainant, a long-term employee of the respondent, made a complaint under s. 77(1)(a) of the *Public Service Employment Act* (S.C. 2003, c. 22, ss. 12, 13), alleging there was an abuse of authority in the application of merit, based on a reasonable apprehension of bias. She alleged that the selection board was composed of three employees who were close to her director general and under that person's authority. There was a history of conflict between the director general and several employees, including the complainant. The director general often made public statements about getting rid of the "old guard" and bringing in "new blood" and had publicly belittled the complainant. The complainant filed a harassment complaint against the director general but asked that it be held in abeyance until after the appointment process was completed. Nevertheless, it was shared with the director general one week before the complainant's interview. The complainant failed two interview questions and was eliminated from the appointment process.

The Board allowed the complaint and found that each selection board member was at least somewhat aware of the issues between the complainant and the director general, including the harassment complaint. The Board held that the respondent had a duty to carry out an assessment that was both unbiased and that did not generate a reasonable apprehension of bias. The Board considered, as a whole, the accumulation of actions in the workplace involving the complainant and found that there was a reasonable apprehension of bias in her assessment. The workplace was ruled by fear because of the director general's conduct, and none of the selection board members could have been seen as truly objective in that environment. The respondent should have ensured that the selection board members were well beyond the director general's sphere of influence and that they knew nothing of her views toward any candidate. The Board declined to revoke the appointment but made recommendations and issued a declaration of abuse of authority.

Samson v. Deputy Head (Correctional Service of Canada), 2024 FPSLREB 177

Staffing – Abuse of authority – Advertised appointment process – Reasonable apprehension of bias – Application of the merit principle – Assessment of written examination – Union responsibilities cited as a reason – Declaration

The complainant made a complaint, alleging that the respondent abused its authority in the application of the merit principle as part of an advertised appointment process. More specifically, she alleged that the manager's assessment of her written examination led to a reasonable apprehension of bias based on the remarks he made about her, particularly in connection with interventions that she made in her capacity as the local union president.

Based on the evidence, and more specifically with regard to assessing the behavioural indicator "[c]arries out decisions in an impartial, transparent and non-partisan manner", linked to the competency "[u]holds integrity and respect", the manager determined, on the basis of the example situation provided by the complainant, that she was partisan because of her union responsibilities and, as a result, she would have difficulty in carrying out the duties of the position in an impartial manner. His exact words read were: "[translation] represents members therefore Ø impartiality - partisan". This was the only comment on this behavioural indicator. The example of the situation in question presented by the complainant dealt with suggestions she made as president of the local union at a union-management meeting attended by the manager.

Furthermore, the evidence revealed that, for each of the behavioral indicators assessed, the manager had, without exception, given the complainant a lower score than the assessment specialist and made more negative comments than the other member of the assessment committee.

The Board found it troubling that the manager attributed the complainant's alleged difficulty in carrying out decisions in an impartial and non-partisan manner to the mere fact that she represents members. The Board found that a well-informed person, looking at the matter realistically and practically, would conclude that the manager's remark that the complainant would have difficulty performing certain tasks because she represents members raises a reasonable apprehension of bias.

Accordingly, the Board allowed the complaint and declared that the respondent abused its authority in the application of the merit principle. The complainant did not allege that the appointee did not meet the merit criteria, that there was abuse of authority in the development of the merit criteria, or that the respondent showed favouritism towards the appointee. As such, the Board determined that the circumstances of the case did not require revoking the appointee's appointment.

Harkness v. Deputy Head (Correctional Service of Canada), 2025 FPSLREB 7

Staffing – Abuse of authority – Internal non-advertised appointment process – Choice of process – Assessment of merit criteria – Errors – Personal favouritism – Discrimination – Disability – Revocation order

The complainant made a complaint, alleging that the respondent abused its authority by choosing a non-advertised process and by improperly assessing the appointee. She also claimed that the appointment was made for reasons of personal favouritism and that she was discriminated against.

The Board found that the respondent abused its authority by choosing a non-advertised process. The process did not conform to the Public Service Commission's appointment framework because justification documents had errors and were missing from the staffing file. The process was also unfair and not transparent. The appointee was not properly assessed against the statement of merit criteria. The appointment was not based on merit because the delegated manager could not have properly made some of the assessments in such a short period, and the appointee could not have accomplished many of the things that she was credited for doing in the assessment. Given the absence of any record, the Board concluded that no interview notes were taken and that no reference checks were made.

For the other allegations, the complainant did not establish that the appointment was based on personal favouritism or that discrimination factored into her not being appointed to the position.

The complaint was allowed and the Board ordered the appointment revoked. It recommended stronger accountability for delegated managers and human resources oversight in non-advertised appointment processes, including mandatory sign-off by human resource advisors. The staffing files in this case were incomplete and error-filled, highlighting the need for human resource advisors to assess risk, support managers, and catch errors. The Board also recommended that the decision form be redesigned to allow for an explanation on the choice of the candidate and the process. Further, that reference checks always be recorded and preserved for five years as specified in the Public Service Commission's *Appointment Policy*.

***Mehra v. Deputy Head (Statistics Canada)*, 2025 FPSLREB 15**

Staffing – Proposed appointment cancelled – Complaint moot

This was a staffing complaint concerning an extension of an acting appointment. The complainant alleged that the appointee did not meet the language requirements.

After the complaint was made, the respondent indicated that it had cancelled the proposed extension of the acting appointment before its effective start date and asked that the complaint be dismissed. Based on the information that the parties provided, it was not contested that the staffing action had been cancelled before its effective start date. However, the complainant asked that checks and balances be put in place, to ensure that this kind of mistake did not happen again.

The Board applied the doctrine of mootness and dismissed the complaint. It found that there was no longer a tangible and concrete dispute between the parties because the respondent had annulled the proposed extension of the acting appointment before the effective start date. The error was corrected before the extension took effect, therefore, the complaint was found moot. The Board also concluded that although it had discretion to hear the complaint despite it being moot, there was no reason in this case to justify exercising that discretion.

Appendix 1 – Total FPSLREB caseload, 2020-2021 to 2024-2025

Federal Public Sector Labour Relations Act

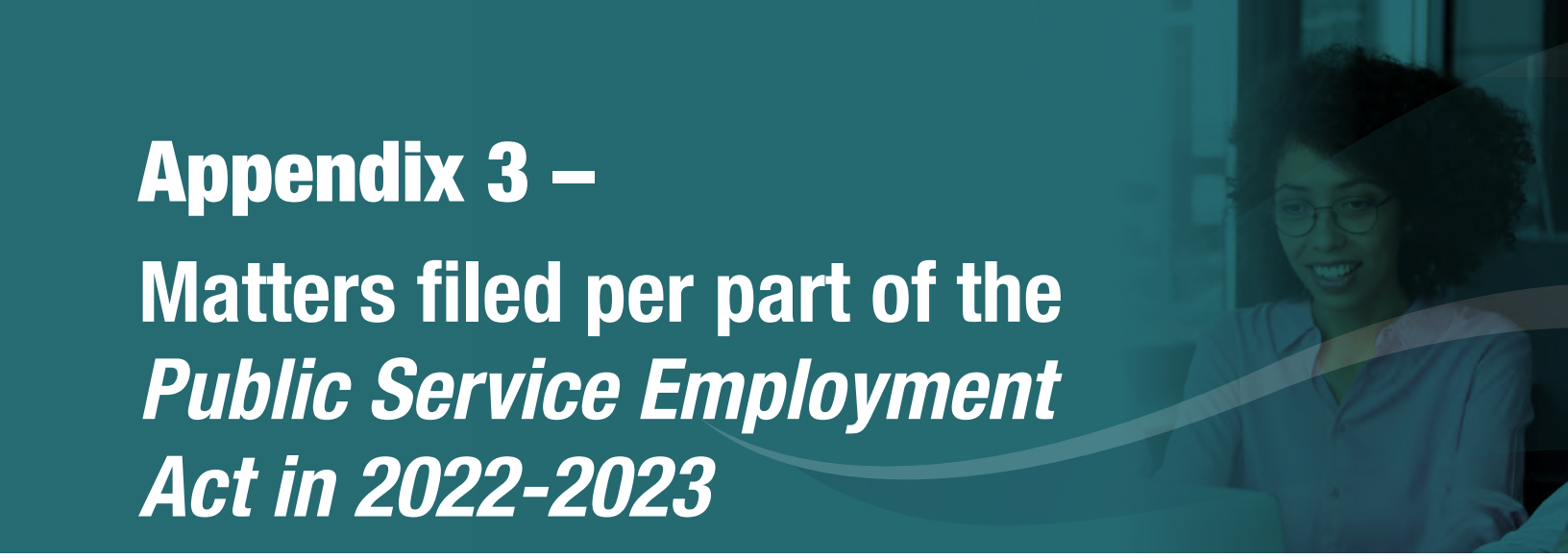
Fiscal Year	Carried Forward from Previous Years	New			Total New	Closed	Carried Forward to Next Year
		Grievances	Complaints	Applications			
2020-2021	6107	545	64	107	716	1050	5773
2021-2022	5773	871	66	196	1133	1099	5807
2022-2023	5807	1803	105	310	2218	1553	6431
2023-2024	6431	1244	99	510	1853	1810	6481
2024-2025	6481	1374	139	507	2020	2256	6245

Public Service Employment Act

Fiscal Year	Carried Forward from Previous Years	New Complaints	Complaints Closed	Carried Forward to Next Year
2020-2021	584	319	269	634
2021-2022	634	306	383	557
2022-2023	557	290	459	383
2023-2024	383	378	436	325
2024-2025	325	418	448	355

Appendix 2 – Matters filed per part of the *Federal Public Sector Labour Relations Act* in 2024-2025

Federal Public Sector Labour Relations Act	Number of Files or Applications
PART I – LABOUR RELATIONS	
Filing of a Board's Order in the Federal Court (s. 35(1))	**2**
Reviews of orders and decisions (s. 43(1))	**0**
Complaints	
Complaints (ss. 106 and 107)	14
Duty to implement a provision of collective agreement (s. 117)	1
Duty to observe terms and conditions – Essential Services Agreement (s. 132)	0
Unfair labour practices (ss. 185, 186, 188, and 189)	27
Unfair labour practices – unfair representation (s. 187)	53
Other	9
Complaints Total	**104**
Managerial or confidential positions	
Applications for managerial or confidential positions (s. 71)	427
Applications for revocation of order (s. 77)	61
Managerial or confidential positions Total	**488**
Applications – Consent to prosecution (s. 205)	**0**
Applications – Determination of membership (Sec. 58)	**1**
PART II – GRIEVANCES	
Individual grievances (s. 209)	**1335**
Policy grievances (s. 221)	**29**
Group grievances (s. 216)	**10**
PART III – OCCUPATIONAL HEALTH AND SAFETY	
Reprisals under s. 133 of the *Canada Labour Code* (s. 240)	**35**
Federal Public Sector Labour Relations Regulations	
PART II – GRIEVANCES	
Extensions of time (s. 61)	**16**
Total	**2020**



Appendix 3 – Matters filed per part of the *Public Service Employment Act* in 2022-2023

Public Service Employment Act	Number of Matters
PART 4 – EMPLOYMENT	
Complaints to the Board re: layoff (s. 65(1))	6
PART 5 – INVESTIGATIONS AND COMPLAINTS RELATED TO APPOINTMENTS	
Revocations of appointment (s. 74)	9
Internal appointments grounds of complaint (s. 77(1))	418
Failures of corrective action (s. 83)	2
Unspecified	13
Total	**448**