

Please note: this grievance was originally written and submitted in French.

March 6, 2024

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Notice of Association Grievance: Violation of a Memorandum of Understanding (A-24-05)

Dear Prof. Carrière:

The APUO hereby files an Association Grievance concerning the Employer's breach of the Memorandum of Understanding (MOU) "Regarding the *Protecting a Sustainable Public Sector for Future Generation Act* ("Bill 124)". The MOU was signed by the Employer and the APUO on October 5, 2023. The MOU covers wage increases for the period from May 1, 2021 to April 30, 2024.

On February 27, 2024, the employer advised the APUO that 198 Members would not be receiving the second tranche of their retro payment, scheduled for the February 29, 2024 payroll, due to, among other things, the complexity of certain leave files (for example, maternity and long-term disability leaves) and technical problems in Workday. On February 26, 2024, the employer had informed the APUO that "affected members would be receiving a message from Payroll informing them of the situation and advising them that Payroll will aim to include the payment in the March 15 payroll."

This delay constitutes a violation of the October 5, 2023, Memorandum of Understanding, which stipulates that all salary adjustment will be applied, and any retroactivity paid within one hundred and twenty (120) days of the ratification of the Memorandum, i.e. no later than February 29, 2024.

The APUO requests that the Employer remedy the grievance as follows:

1. Acknowledge that the delay in payment for these 198 members is a breach of the Memorandum of Understanding signed of October 5, 2023;
2. Award each of the affected members \$500 in damages;
3. Pay to each of the affected members, as lost wages, 2% of the amounts paid out late;
4. Pay to the Association, as damages, the sum of \$5,000;
5. Any other remedies deemed appropriate.

Sincerely,

Dimitri Karmis
President, APUO

c.c.: T. Foth, Grievance Officer, APUO