

City of Surrey People Practice

Practice Name:	Attendance Support Program		
Last Updated:	December 21, 2016		

POLICY

The City appreciates and acknowledges employees' efforts to be at work and on time every day.

Maintaining regular attendance is a commitment that employees make to the City and their co-workers. This commitment is critical to the City's ability to deliver services to Surrey citizens in a safe, professional and efficient manner. The majority of people working for the City meet this commitment on a daily basis.

The City understands that from time to time, employees may have health, family or life issues that impact regular attendance at work. The City provides a variety of support initiatives to help employees in those types of situations. Employees should proactively inform their managers of such challenges or advise the City's Occupational Health and Safety Team, if confidentiality is a consideration.

Unfortunately, some employees are unable to maintain regular attendance. They consistently fall short of the City's attendance standards through frequent absences, and/or extended absences.

To support employees who consistently fail to maintain regular attendance, the City developed an Attendance Support Program (the "Program") in 2008. The Program has the goals of ensuring an employee:

- receives appropriate support and counseling to achieve regular attendance,
- understands the workplace accommodation options that are available,
- understands the workplace impact of poor attendance, and
- understands the potential outcomes if his/her attendance does not improve.

This Program assists in ensuring that employee absenteeism is managed in a fair and consistent manner, while maintaining a flexible approach to respond to individual circumstances. That flexibility enables the City to meet its duty to accommodate disabled employees, where such a duty arises, short of undue hardship.

The City's focus is on attendance improvement through awareness, intervention and individual case management, applied in a consistent, supportive and non-punitive manner.

RESPONSIBILITIES

Employees are responsible for being at work on a regular basis. Employees who are unable to report to work as scheduled must comply with their Department's call-in procedures and must maintain regular contact with their manager. Employee responsibilities also include; seeking/following appropriate medical treatment, providing the City with the information needed to administer its benefit/attendance programs, and cooperating with the City's Return to Work and Duty to Accommodate processes.

Managers are responsible for ensuring consistent application of the Program within their work areas, in compliance with the Collective Agreement (if applicable), the Human Rights Policy, the Respectful Workplace Policy, and relevant legislation. In addition, managers support the City's Return to Work and Duty to Accommodate processes. They are responsible for consulting Human Resources ("HR") as required, and for maintaining the required records in a manner that ensures the confidentiality of employee medical information and his/her status on the Program.

Human Resources (HR) is responsible for communicating the Program to all employees, issuing bi-annual reports, calculating the City Average Absenteeism Level (and applicable City Averages), training/coaching managers/supervisors in the Program's application, and facilitating citywide compliance. In addition, HR develops and provides a variety of attendance support initiatives such as benefits programs, EFAP (Employee and Family Assistance Program), wellness initiatives, and Return to Work and Duty to Accommodate processes. HR maintains confidentiality of both employee medical information and an individual's status on the Program. HR retains the City's records on the Program and is the centre of expertise on its administration/delivery.

APPLICATION

This Program applies to all City employees, except term, auxiliary status, project and employees in their probationary period, who must meet a higher standard of attendance and may be supported/resolved in alternate methods. This Program does not apply to Library and Fire employees, who have their own attendance support programs.

This Program does not apply to situations involving chronic long-term absences (e.g. Long Term Disability, WorkSafe BC claims), disciplinary absenteeism (absence without leave, lateness, early quits, etc.), or when an employee's absenteeism is related to a documented disability.

PROGRAM DESIGN

The City reserves its right to periodically modify and re-communicate this Program.

THE ATTENDANCE SUPPORT PROGRAM:

In January/February and June/July of each year (at a minimum), HR issues to managers attendance reports by work group that identify the percentage and hours of absences for each employee in that work group for the previous twelve-month period. These reports also show the 6-month attendance trends for eligible employees. The reports may be amended from time to time to best meet the needs of Program users.

HR calculates and issues to Management and the Union, a **City Average Absenteeism Level** for the previous 12 months (the "City Average"). Separate applicable City Averages are calculated for the following work groups:

- Exempt staff
- Outside Workers (the "Outside Average")
- Inside Workers (the "Inside Average")

The Outside and Inside Worker Averages (the applicable City Averages) are further calculated to account for standard workdays, 10-hour workdays and 12-hour workdays. The City Average and separate applicable City Averages are posted on the City's intranet to support employee awareness. More specific

information on the calculation of the City Average Absenteeism Level is contained in a separate document.

The City Average is calculated using hours worked versus hours scheduled and are reported in hours (scheduled and absent) and as a percentage. Absences, including paid and unpaid sick days, unauthorized leaves of absence, union business, paid education, etc. will be considered hours scheduled, in addition to the actual hours worked. Absences not included in hours scheduled are those expressly provided for in agreements, contracts and legislation such as; vacation days, holidays, Workers Compensation, compassionate care leave, disciplinary suspensions, bereavement leave, authorized leave of absences, pregnancy leave, parental leave, family responsibility leave, long term disability, etc.

The Program is designed on a progressive model with the goal of supporting meaningful 2-way communication with employees. It involves a series of discussions over a period of time to support improved attendance. The City's goal is to support employee attendance success through heightened awareness, progressive discussions, early intervention, and individual case management.

Employee Recognition

Managers should recognize employees with excellent attendance and/or improving attendance records. The City has an annual Perfect Attendance Program that recognizes perfect attendance in a formal documented method. However, managers are also encouraged to periodically, verbally or in writing, commend staff with good attendance rates and those staff showing improvement in achieving below average absenteeism.

ATTENDANCE SUPPORT PROGRAM PROCESSES

Training Requirement:

Managers using this Program are required to receive training on the Program, its purpose, and its related processes before applying the Program to employees. At least twice per year, HR provides training on this Program to eligible managers. If a manager is unable to attend a training session before applying the Program, he/she must either deliver the Program in partnership with a trained manager or with the support/coaching of HR.

Process Overview:

Fundamentally, the Program consists of the following steps for a manager:

- Information Review
- **Step 1** meeting with the employee and the Union (if applicable) which may result in a verbal non-disciplinary, coaching step that is active for 12 months*
- Information Review
- **Step 2** meeting with the employee and the Union (if applicable) which may result in a written non-disciplinary, coaching step that is active for 12 months*
- Information Review
- **Step 3** meeting with the employee, the Union (if applicable) and HR which may result in a written, non-disciplinary coaching step that is active for a minimum of 24 months
- Information Review
- **Step 3.5** meeting with the employee, the Union (if applicable) and HR which may result in a written, non-disciplinary coaching step that is linked to seeking more information
- Information Review
- **Step 4** meeting with the employee, the Union (if applicable) and HR which may result in the non-disciplinary termination of employment

Information Review:

Before placing an employee on the Program, removing an employee from the Program, leaving the employee on a Step of the Program, or progressing an employee from one Step in the Program to the next, a manager reviews the absence report for his/her work group against the applicable City Average and identifies all employees whose absenteeism rates exceed the applicable City Average.

For employees with absenteeism above the applicable City Average, the manager will review his/her understanding of the justification for the excessive absences, the employee's prior attendance record, and the 6 month absenteeism trend pattern (flat, improving, worsening), to determine if any further action is required. Factors to be considered include a marked change in attendance performance, absences with no explanation, a pattern showing certain days being missed (e.g. extended weekends), failure to call-in, declining work performance, the number of absences, repeated tardiness, and attendance rates chronically above the applicable City Average.

Consideration should be given in this evaluation as to whether the absences are culpable (within an employee's control) or non-culpable (absences that are non-blameworthy). If the absences are culpable, the manager should discuss the situation with HR and deal with those absences in a disciplinary model outside of this Program.

The two questions to be considered by the manager in the review are; "Can the employee's attendance issue(s) be explained by recent, one time circumstances? Is there a concern of an ongoing pattern with no duty for the employer to accommodate?" HR is available to assist the manager in this information review. If after the information review, the manager concludes that there is no ongoing attendance concern, no discussion will occur with the employee unless future attendance problems arise.

The manager notes his/her decision not to progress the employee on the Attendance Report and returns the information to HR.

Step 1:

Purpose: To enable the manager to understand if there is an attendance issue and to ensure the employee understands both the support available to achieve better attendance and the potential consequences if the attendance issue is not resolved.

If after reviewing the Attendance Report and related information, the manager concludes that a discussion is required with the employee to further understand his/her attendance record and to potentially provide formal coaching, the manager will meet with the employee in a **review meeting**. If the employee does not have an active verbal notification or ASP letter on file, then a Step 1 review is appropriate. The Union (if applicable) should be invited to attend the Step 1 review meeting, unless the employee requests only to meet with the manager. The attendance of HR at this meeting is optional.

Review Meeting:

- In the review meeting, the manager reviews the Attendance Support Program with the employee and provides the employee with a copy of the Program, an EFAP card (Employee and Family Assistance Program), and the ASP pamphlet.
- 2. The Manager then:
 - Asks the employee to explain his/her attendance record,
 - Discusses reasons for the employee's level of absenteeism,
 - Advises the employee of the support resources available (EFAP, Union Rep, Occupational Health & Safety Rep, etc.),

- Explains the applicable City Average,
- Discusses the importance of regular attendance, and where appropriate,
- Requests a commitment from the employee to improve his/her attendance.
- The two questions to be considered by the manager are; "Can the employee's attendance issue(s) be explained by recent, one time circumstances? Is there a concern of an ongoing pattern with no duty for the employer to accommodate?" HR is available to assist the manager in this review.
- 3. If after considering the information provided in the review meeting, the explanation by the employee is deemed to be sufficient by the manager, the employee and the Union (if applicable) will be informed that the employee will not be placed on the Program. No documentation will be placed on the employee's file. The manager will note his/her decision not to progress the employee on the Attendance Report and return the information to HR.

Progression Meeting:

- 4. If after considering the information provided in the review meeting, the explanation by the employee is deemed not to be sufficient by the manager, a Step 1 meeting may be scheduled. Circumstances may occur when the review of the information and the decision to place the employee at Step 1 of the Program occur at the same meeting.
- 5. When confirming that a Step 1 verbal notification will be issued, the manager, with the Union Representative (if applicable), will advise the employee of the support resources available (EFAP, Union Rep, Occupational Health & Safety Rep, etc.), discuss the importance of regular attendance, and where appropriate, will request a commitment from the employee to improve his/her attendance. The employee will be provided with a copy of the Step 1 checklist.
- 6. The manager will advise the employee that he/she will be placed on Step 1 of the Program and his/her absenteeism level will continue to be monitored and reviewed on an ongoing basis. A letter confirming the Step 1 meeting will not be placed on the employee's file. Step 1 is a verbal notification and a note will be made by the manager on the Program Attendance Report with respect to the employee and the Report should be returned to HR.
- 7. The employee's progression to Step 1 of the Program will normally occur in January/February following the manager's review of the employee's attendance reports from the previous year. Additional review meetings may occur throughout the year depending on the pattern or trend of absences. A mid-year review meeting should occur to determine the employee's attendance trend for the calendar year-to-date.
- 8. If after the Step 1 notification, the employee's absenteeism is at or below the applicable City Average for 12 months*, the employee will be thanked for his/her attendance improvement. If the employee subsequently has a level of absenteeism above the applicable Average, he/she will re-enter the Program at Step 1.

Step 2:

Purpose: To enable the manager to understand if there is an attendance issue and to ensure the employee understands both the support available to achieve better attendance and the potential consequences if the attendance issues are not resolved.

If after reviewing the Attendance Report and related information, the manager concludes that a discussion is required with the employee to further understand the Attendance Report and to potentially provide formal coaching, the manager will meet with the employee in a review meeting. If the employee has an active Step 1 notification on file, then a Step 2 review is appropriate. The Union (if applicable) should be invited to attend the Step 2 review meeting. The attendance of HR at this meeting is optional.

Review Meeting:

- 1. In the review meeting, the manager reviews the Attendance Support Program with the employee and provides the employee with a copy of the Program, an EFAP card, and the ASP pamphlet. If possible, the employee and the Union (if applicable) should be reminded of the date of the Step 1 notification.
- 2. The manager then:
 - Asks the employee to explain his/her attendance record,
 - Discusses reasons for the employee's level of absenteeism,
 - Advises the employee of the support resources available (EFAP, Union Rep, Occupational Health & Safety Rep, etc.),
 - Explains the applicable City Average,
 - Discusses the importance of regular attendance, and where appropriate,
 - Requests a commitment from the employee to improve his/her attendance.
 - The two questions to be considered by the manager are; "Can the employee's attendance issue(s) be explained by recent, one time circumstances? Is there a concern of an ongoing pattern with no duty for the employer to accommodate?" HR is available to assist the manager in this review.
- 3. If after considering the information provided in the review meeting, the explanation by the employee is deemed to be sufficient by the manager, the employee and the Union (if applicable) will be informed that the employee will not progress in the Program. The employee will remain at Step 1 of the Program (if a decision to hold the employee is made see information below) or will be removed from the Program. No Step 2 documentation will be placed on the employee's file. The Manager will note his/her decision not to progress the employee on the Attendance Report and return the information to HR.

Progression Meeting:

- 4. If after considering the information provided in the review meeting, the explanation by the employee is deemed not to be sufficient by the manager, a Step 2 meeting may be scheduled. Circumstances may occur where the review of the information and the decision to place the employee at Step 2 of the Program occur at the same meeting.
- 5. When confirming that a Step 2 letter will be issued, the manager, with the Union Representative (if applicable), will advise the employee of the support resources available (EFAP, Union Rep, Occupational Health & Safety Rep, etc.), discuss the importance of regular attendance, and where appropriate, request a commitment from the employee to improve his/her attendance.
- 6. The manager will advise the employee that he/she will be progressed to Step 2 of the Program and his/her absenteeism level will continue to be monitored and reviewed on an ongoing basis. The consequences of failing to achieve the applicable City Average consistently over time will be explained to the employee (i.e. the potential for termination of employment). A non-disciplinary letter confirming the Step 2 meeting will be placed on the employee's file.
- 7. The employee's progression to Step 2 will normally occur in January/February following the manager's review of the employee's attendance reports from the previous year. Additional review meetings may occur throughout the year depending on the pattern or trend of absences. A mid-year review meeting should occur to determine the employee's attendance trend for the calendar year-to-date.
- 8. If after a Step 2 letter, the employee's absenteeism is at or below the applicable City Average for 12 months*, the employee will receive a letter confirming his/her removal from the Program. If the employee subsequently has a level of absenteeism above the applicable City Average, he/she will re-enter the Program at Step 1.

Step 3:

Purpose: To enable the manager to understand if there is an attendance issue and to ensure the employee understands both the support available to achieve better attendance and the potential consequences if the attendance issue is resolved. The employee will be advised that his/her employment is in jeopardy if his/her attendance does not improve.

If after reviewing the Attendance Report and related information, the manager concludes that a discussion is required with the employee to further understand his/her attendance record and potentially provide formal coaching, the manager will meet with the employee in a **review meeting**. If the employee has an active Step 2 letter on file, then a Step 3 review is appropriate. The Union (if applicable) must be invited to attend the Step 3 review meeting. HR must also be invited to the meeting.

Review Meeting:

- 1. 1. HR will document the employee's entire attendance history (including WCB and LTD -- which are provided as an indication of the total time missed from work in the relevant work period).
- 2. In the review meeting, the manager reviews the Attendance Support Program with the employee and provides the employee with a copy of the Program, an EFAP card, and the ASP pamphlet. The employee and the Union (if applicable) should be provided with a copy of the Step 2 letter.
- 3. The manager then:
 - Asks the employee to explain his/her attendance record,
 - Discusses reasons for the employee's level of absenteeism,
 - Advises the employee of the support resources available (EFAP, Union Rep, Occupational Health & Safety Rep, etc.),
 - Explains the applicable City Average,
 - Discusses the importance of regular attendance, and where appropriate,
 - Request a commitment from the employee to improve his/her attendance.
- 4. The questions to be considered by the manager are; "Can the employee's attendance issue(s) be explained by recent, one time circumstances?; Is there a concern of an ongoing pattern with no duty for the employer to accommodate?"; and "Is the employee's attendance issue(s) (considering both the total time missed and number of the years above the applicable City Average) worse than other employees?"
- 5. If after considering the information provided in the review meeting, the total attendance history, and the manager's responses to the questions in item 4, the explanation by the employee is deemed to be sufficient by management, or the employee attendance record is not significantly above the average, the employee will be thanked for his/her explanation, will be told he/she is not progressing in the Program, and will remain at Step 2 of the Program. The manager will note the reason for his/her decision not to progress the employee on the Attendance Report and will return the information to HR.

Progression Meeting:

- 6. If after considering the information provided in the review meeting, the explanation by the employee is deemed not to be sufficient by Management, a Step 3 meeting should be scheduled. The review of the information and the decision to place the employee at Step 3 of the Program should not occur at the same meeting.
- 7. The manager will contact the Union representative (if applicable) and will meet with the Union, HR, and the employee to discuss the employee's attendance record.
- 8. The employee will be told that he/she has been progressed to Step 3 of the Program and that his/her absenteeism level will be monitored and reviewed over the next 24 months. The consequences of failing to achieve the applicable City Average Attendance level consistently over time will be explained to the employee. In most cases, the consequences of continued

7 | Page 12/21/2016

- unsatisfactory attendance will be termination of employment. The employee will receive a non-disciplinary letter documenting the Step 3 meeting. The letter will be placed on the employee's file.
- 9. If after a Step 3 letter, the employee's attendance is at or below the applicable Average for 24 months, the employee will receive a letter confirming his/her removal from the Program. If the employee subsequently has a level of absenteeism above the City Average, the employee will reenter the Program at Step 1.

Step 3.5:

Purpose: To begin the process of gathering information to determine if there is any potential that the employee will be able to achieve average attendance over the long term.

If, after reviewing the mid-year attendance report and related information, the Manager concludes that a discussion is required with the employee to further understand the attendance record and potentially provide formal coaching, the Manager will meet with the employee in a **review meeting**.

An employee who has Step 1 documentation, a Step 2 letter, and a Step 3 letter, and who subsequently exceeds the City Average for any reasonable period during the 24 months following the Step 3 meeting, will have his/her entire attendance history documented (including WCB and LTD which are provided as an indicator of the total time missed from work in the relevant work period), and will be scheduled for an attendance review meeting. The Union (if applicable) must be invited to attend the Step 3 review meeting. HR must also be invited to the meeting

Review Meeting:

- 1. HR will document the employee's entire attendance history (including WCB and LTD which are provided as an indicator of the total time missed from work in the relevant work period).
- 2. In the review meeting, the manager reviews the Attendance Support Program with the employee and provides the employee with a copy of the Program, the EFAP card, and the ASP pamphlet. The employee and the Union (if applicable) should be provided with a copy of the Step 3 letter.
- 3. The Manager then:
 - Asks the employee to explain his/her attendance record,
 - Discusses reasons for the employee's level of absenteeism,
 - Advises the employee of the support resources available (EFAP, Union Rep, Occupational Health & Safety Rep, etc.),
 - Explains the applicable City Average,
 - Discusses the importance of regular attendance, and where appropriate,
 - Requests a commitment from the employee to improve his/her attendance.
- 4. The main questions to be considered by the Manager are; "Can the employee's attendance issue be explained by recent, one time circumstances?"; "Is there a concern of an ongoing pattern with no duty for the employer to accommodate?"; and "Is the employee's attendance issue(s) (considering both the total time missed and the number of years above the applicable City Average) worse than other employees?"
- 5. If after considering the information provided in the review meeting, the total attendance history and the manager's response to the questions in item 4, the explanation by the employee is deemed to be sufficient by management, or the employee attendance record is not significantly above the average, the employee will be thanked for his/her explanation, will be told he/she is not progressing in the Program, and will remain at Step 3 of the Program. The manager will note the reason for his/her decision not to progress the employee on the attendance report and will return the information to HR.

Progression Meeting:

- 1. If, after considering the information provided in the review meeting, the explanation by the employee is deemed not to be sufficient by Management, then a letter/questionnaire will be provided to the employee to obtain credible, current and clear medical information regarding the employee's ability to maintain regular attendance and any medical condition that may be impacting the employee's attendance. The City will pay the reasonable cost of obtaining the required medical information, but the employee is expected to comply with the request.
- 2. Upon receipt of acceptable medical documentation, the City will review that information in context with the employee's employment/attendance history. The City's goal is to obtain information to support the employee's future successful attendance at work.
- 3. At the Step 3.5 meeting, the medical information outcome will be clarified to the employee. The information will be reviewed/considered at the subsequent Step 4 review (if it is required).
- 4. The employee will be told that he/she has been progressed to Step 3.5 of the Program and that his/her absenteeism level will be monitored and reviewed over the next 24 months. The consequences of failing to achieve the applicable City Average consistently over time will be explained to the employee. In most cases, the consequences of continued unsatisfactory attendance will be termination of employment. The employee will receive a non-disciplinary letter documenting the Step 3.5 meeting. The letter will be placed on the employee's file.
- 5. If after a Step 3.5 letter, the employee's attendance is at or below the applicable City Average for 24 months, the employee will receive a letter confirming his/her removal from the Program. If the employee subsequently has a level of absenteeism above the applicable City Average, the employee will re-enter the Program at Step 1.

Step 4:

Purpose: To determine if there is any potential that the employee will be able to achieve average attendance over the long term. If there is a potential for longer term success, provide the employee with the support and encouragement to be successful. If there is no potential for longer term success, terminate the employee's employment for non-culpable reasons.

Meeting:

- 1. An employee who has a Step 1 notification, a Step 2 letter, a Step 3 letter, a Step 3.5 review, and who subsequently exceeds the applicable City Average for any reasonable period during the 24 months following the Step 3.5 meeting, will have his/her entire attendance history documented by HR (including WCB and LTD which are provided as an indication of the total time missed from work in the relevant work period) and will be scheduled for a Step 4 meeting.
- 2. The Manager will contact a Union representative (if applicable) and will meet with the Union, HR, and the employee to discuss the employee's attendance level.
- 3. In the Step 4 meeting, the manager will ask the employee to explain his/her attendance level, discuss the employee's reasons for his/her level of absenteeism, advise the employee of the support resources available (EFAP, Union Rep, Occupational Health & Safety Rep, etc.), explain the applicable City Average, discuss the importance of regular attendance, and where appropriate, request a commitment from the employee to improve his/her attendance.
- 4. The Information gathered at Step 3.5 will be considered, and the employee may be asked to provide current medical information. In the absence of evidence that the employee can achieve acceptable attendance levels, the employee's employment with the City will be terminated.
- 5. If after considering the information provided both at the Step 3.5 review and the Step 4 review, Management deems the employee's explanation and medical information to be sufficient, the employee will remain at Step 3.5 of the Program.
- 6. While at Step 3.5 of the Program, the employee's attendance record will be reviewed on a regular and ongoing basis.

Mid-Year Attendance Reviews:

Under the Program, it is planned that employees will typically be measured on their calendar year attendance. Placement on Steps 1 to 3 of the Program will typically occur in the January/February/March time frame of each year. Furthermore, it is anticipated that a mid-year attendance review/discussion will occur with eligible employees in July/August. Placement on Step 3.5 of the Program may occur in the mid-year time frame. Note: the timing of an employee's placement on the Program may be impacted by his/her attendance at work (i.e. an employee could be off work in the January/February time frame so the attendance discussion and any progression on the Program would occur upon his/her return to work). Employees eligible for mid-year reviews include those employees active on the Program, and those employees who, based on their attendance record for the first half of the calendar year, are in jeopardy of being placed on the Program at the end of the calendar year. The mid-year review is intended as a positive coaching discussion to ensure employees are aware of their attendance trends and are offered the resources necessary to be successful. Documentation for these reviews will be a notation on the Attendance Records by the managers and returned to HR.

* 12 month Expiry Date – Holding Employees at a Program Step:

While active in Program, it is anticipated that employees on Step 1 or Step 2 will be removed from the Program after a calendar year of achieving attendance at or below the applicable City Average. An employee, who in subsequent years moves on and off the Program, may be required to complete a 24 month period of attendance at or below the applicable City Average, to be removed from the Program at Step 1 or Step 2. Some employees may develop a pattern of qualifying for Program participation every other year. It is not the goal of the Program to support such behaviours.

There are also situations when an employee may not be removed from Step 1 or Step 2 of the Program after 12 months but will be held at his/her current Step in lieu of progression to the next Step of the Program. These situations typically link to employees who are above the applicable City Average at year end, but who show an improving absenteeism trend in the last 6 months. The manager will have the option to not progress the employee to the next Step of the Program, but to not remove the employee from the Program until the improvement trend is confirmed over a 12 month period.

Medical Information:

The City reserves its right to request reasonable medical information from employees at any time during this Program. Reasonable medical information is typically credible, current and clear. Such information will be received and maintained in confidence and will be treated in accordance with applicable privacy legislation.

Information Retention:

10 | Page

The City retains a variety of information with respect to the administration of the Program. Such information will be retained and accessed in compliance with applicable privacy legislation and collective agreement language (where applicable). Managers can discuss information retention standards with HR.