Reviewing Company Policies & Procedures

With the start of a new year, now is the ideal time to take a look over company policies and procedures to ensure that:

1. You are up to date and in compliance with any recent changes to employment and business laws, and
2. You haven’t overlooked any of your policies over the past few years and fallen behind in documentation or formal procedures.

To assist with this endeavor, one of the best tools a company can use is a Human Resources (HR) Audit. An HR Audit is designed to review and assess company policies and practices. An HR audit enables a company to identify their strengths and weaknesses regarding employment law compliance, company policies and employee relations.

Audits are usually conducted when there are significant organizational changes such as an acquisition or merger, when new regulations are announced, when a company becomes a federal contractor or subcontractor, issues a new employee handbook or alters management practices.

Another time to review practices is when a company goes through a growth cycle or experiences significant change. It is recommended that companies conduct HR audits at least once every five years.

**Objectives of an HR Audit**

- Identify policies and procedures that need to be updated to ensure legal compliance with employment laws and reduce the company’s potential exposure to claims and litigation
- Identify inconsistent procedures and practices before they become problems
- Improve or enhance employee communications and employee morale
- Identify policies and procedures that are not followed and find out why
- Identify opportunities for new policies or procedures that will help minimize risk
- Determine whether record-keeping practices are being followed
- Identify where additional training or communication would be helpful for compliance

On page 11 is a basic HR Audit checklist. These questions will help companies to identify areas within HR that need to be worked on and/or updated. Please call the TPM office at (877) 535-4646 if you have any questions or would like assistance. TPM also offers a larger in-depth HR Audit for members; please call the TPM office if you are interested in having a TPM staff member work with your company on a full-scale review of your HR policies and procedures.

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**KEY ELEMENTS OF CORRECTIVE ACTION & COUNSELING**

- Make sure all employees receive a copy of your company’s rules and policies.
- Clearly communicate job duties and expectations to all employees.
- Regular performance evaluations can help maintain and update these communications.
- Apply counseling or corrective action as soon as the performance problem or behavior occurs.
- Document all counseling/corrective actions—both informal and formal.
- Prepare for counseling/corrective interviews in advance.
- Conduct meetings in private.
<table>
<thead>
<tr>
<th>Company</th>
<th>Phone</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address</td>
<td></td>
</tr>
<tr>
<td>Contact Person</td>
<td>Total Number of Employees</td>
</tr>
<tr>
<td>Other Locations Within 75 miles?</td>
<td>YES</td>
</tr>
<tr>
<td>Federal Contractor?</td>
<td>YES</td>
</tr>
<tr>
<td>Union Facility?</td>
<td>YES</td>
</tr>
</tbody>
</table>

**What does the company do?**

<table>
<thead>
<tr>
<th>YES</th>
<th>NO</th>
<th>N/A</th>
<th>For Each Question-Check YES, NO, or N/A (Mark Not Applicable)</th>
</tr>
</thead>
</table>

**EMPLOYEE HANDBOOK**

- Does your company have a current employee handbook in place?  
- Is there a process in place to ensure your handbook is reviewed and updated annually? Reviewed by an employment law attorney?
- Are employees required to sign for their copy of the employee handbook?

**HUMAN RESOURCES**

- If applicable, do application forms identify that the employment relationship at the organization is “at-will?”
- Do job descriptions exist? Are they up-to-date? Are they also kept in the employee’s personnel file?
- Are W-4 forms completed for all new hires and reported to the IRS (if required)?
- Are I-9 Forms and acceptable documentation reviewed annually?
- Are supervisors trained on handling employee relations problems to include: coaching, documentation, discipline, sexual harassment, and employment law? Documented and filed in personnel files?

**POLICIES AND PROCEDURES**

- Does your company have a policy in place to prohibit non-exempt employees from working overtime without management approval?
- Does your company have a process in place to ensure employees work the minimum hours required to maintain benefits eligibility (i.e. Health Plan eligibility)?
- Is there a clearly stated and emphasized Open Door Policy?
- Is there a formal process for employees to lodge complaints?
- Does the company have a written progressive discipline policy in place?

**SAFETY AND SECURITY**

- Are workplace accidents, near-misses, injuries, and illnesses reported and investigated?
- Are employees encouraged to promptly report incidents, and suggest ways to reduce or eliminate risks? Are employees trained on how and when to report accidents?
- Are OSHA Forms 300, 300a and 301 completed, maintained and posted as required in the workplace?
- Are written safety programs in place to cover the most frequently cited OSHA areas below?
  - a. Control of Hazardous Energy
  - b. HAZCOM
  - c. Occupational Noise Exposure
  - d. Confined Space Entry
  - e. Machine Guarding
  - f. Personal Protective Equipment
  - g. Emergency Exit
  - h. Bloodborne Pathogens
- Are employees trained on how and to whom to report unsafe working conditions?
- Does Management act when unsafe conditions and practices are reported?
- Has a Personal Protective Equipment (PPE) hazard assessment been conducted for the job? Are employees trained in the use and care of their PPE?
- Are only trained and authorized employees operating forklifts? Are you paying for training?
- Does the workplace contain a list of hazardous chemicals, materials or gases involved, along with instructions on the safe use and emergency action following accidental exposure?
- Are first aid kits well marked and accessible by employees at all times?