# The New Dynamic Internal Audit Checklist A Human Resources Survival Tool

## **Barbados**

### **DENTONS**

Burnham Court Bishop's Court Hill St. Michael BB11115 Barbados D +1 246 228 2260

**Key Contacts** 



Erica Marshall-Forde
Partner
Barbados
D +1 246 228 2260
erica.marshall-forde@dentons.com



Shellyanne Smith Attorney-at-Law Barbados D +1 246 228 2260 shellyanne.smith@dentons.com

# Internal Audit Checklist

Status		
Advance Planning Priority Level and Assigned to	Task	Status
	Create or update Infectious Disease Preparedness & Response Plan to align with WHO and the Ministry of Health and Wellness guidance. Create or update additional workplace safety plans to align with local requirements.	
	Create or update risk assessments and site-specific safety plans, as required by local law.	
	Setup a return-to-work taskforce that oversees all operations, policy development, communications, and strategy relating to COVID-19 workplace changes.	
	Create a set of re-entry to the workplace policies and handbooks for employees and vendors.	
	Identify posters and other communications that will be posted in the workplace and distributed to employees electronically.	
	Train employees on all new workplace safety policies and procedures, and maintain records of training completion.	
Cleaning & Ventilation Priority Level and Assigned to	Task	Status
	Identify and implement cleaning protocols for high-risk and high-touch areas and surfaces throughout the workplace.	
	Ensure cleaning protocol aligns with local requirements and guidance on workplace cleaning.	
	Identify and make available appropriate PPE for cleaning crew and other individuals, as appropriate, within the workplace.	
	Identify and contract with third-party vendor(s) to perform cleaning services, where appropriate.	
	Conduct a risk assessment of current ventilation systems to determine if changes need to be made to align with local requirements and guidance.	
	Consider adopting, or revising an existing incident response plan for COVID-19 exposures in the workplace.	

Physical Distancing Priority Level and Assigned to	Task	Status
	Create policies and procedures for creating physical distancing within the workplace, including protocols for distancing workstations, creating unilateral pathways in hallways and common areas, and potential staggering of work shifts.	
	Identify physical spaces, structures and floor plans that may require remediation. Consult with experts (e.g., interior designer, space planner) on space planning and design issues relating to physical distancing within the workspace.	
	Consider staggered schedules, especially for those employees that share physical workspaces.	
	Distribute policies and procedures for physical distancing within the workplace, and implement training and support on new policies and procedures.	
Hygiene & Reducing Transmission Priority Level and Assigned to	Task	Status
	Consider structural changes to promote personal hygiene and reduction of transmission, such as touchless entry systems, elevator controls, hand sanitizer supplies, etc.	
	Create policies and procedures that promote personal hygiene and transmission prevention, such as not using other workspaces, hand washing, and not sharing tools, equipment and other commonly shared office items.	
	Implement training and support for new hygiene protocols.	
	Create policies and procedures relating to the wearing of face masks that align with local guidance and requirements.	
Screening Priority Level and Assigned to	Task	Status
	Create policies and procedures for the screening of job applicants, contractors and employees, including symptom tracking and temperature reading, where appropriate, and ensure said programs align with local requirements.	
	Consider technologies for temperature reading, including thermal thermometers and/or body scanning technology.	
	Create symptom tracing and testing protocol, and communicate the same to employees.	
	Identify physical standards for temperature reading and/or other screening mechanisms, including flow of workforce and protocols for those responsible for taking the temperatures.	
	Map data privacy and cybersecurity legal and regulatory obligations to ensure appropriate notice and security around screening data is maintained.	

Workplace Communications & Reporting			
Employee Communications Priority Level and Assigned to	Task	Status	
	Create communications plan to convey new policies, procedures, and safety plans and risk assessment results to returning and existing employees.		
	Identify core communications team to handle employee requests, clarifications and HR concerns.		
	Create internal reporting mechanism where employees can channel concerns regarding workplace safety and compliance.		
Compliance Personnel Priority Level and Assigned to	Task	Status	
	Identify and appoint head of compliance, if not already a position within the organization.		
	Map regulatory and legal obligations as it relates to reopening.		
	Identify and map contractual obligations as it relates to vendors and reopening communications and procedures.		
Third-Party Communications Priority Level and Assigned to	Task	Status	
	Identify vendors and contractors that may be impacted by reopening strategy and new COVID-19-related policies and procedures.		
	Identify applicable regulators, law enforcement, and government officials that may be contacted during COVID-19-related investigations.		
	Develop communications plan for third-party vendors, government and law enforcement.		
Anti-Discrimination,	Anti-Discrimination, Accommodations & Leave		
Anti-Discrimination Priority Level and Assigned to	Task	Status	
	Update and refresh anti-discrimination, anti-harassment and anti-retaliation policies to align with new and emerging local guidance and requirements.		
	Update and distribute training on anti-discrimination, anti-harassment and anti-retaliation policies.		

Accommodations	Task	Status
	Update or create new policies and procedures to address employee leave requests under local guidance and requirements.	
	Update or create new policies and procedures to address employees who either refuse to come to work or refuse to comply with safety protocols upon return to work.	
	Update or create new policies and procedures to address accommodation requests and ensure the interactive process is consistently applied, as required by local guidance and requirements.	
	Update or create new policies and procedures to address customer requests for safety related accommodations, or refusal to comply with existing safety protocols (e.g., refusing to wear a mask, refusing to comply with newly posted safety protocols, requesting additional safety protocols).	
Leave	Task	Status
	Amend existing policies and procedures relating to paid sick leave, if applicable.	
	Review all paid sick leave, expanded family leave and other leave laws, and revise policies and procedures to align with such requirements, if applicable.	
	Train employees on all new leave policies and procedures, and maintain records of training completion.	
	Designate individual to oversee and coordinate all new leave requests.	
	Prepare policies enforcing policies and procedures to prevent against fraudulent leave requests.	
	Ensure third-party leave-processing vendors follow and comply with the organization's updated paid sick leave policies and procedures.	

Lay-offs & Hiring		
Returning Laid off & Terminated Employees Priority Level and Assigned to	Task	Status
	Ensure compliance with local law relating to partial workweek payments for salaried, exempt employees if individuals are returned mid-week.	
	Consider health-screening policies and procedures for new hires and returning employees, and communicating said policies and procedures prior to return-to-work.	
	Ensure applicable policies regarding accrual of paid time off or other forms of leave are consistently applied to all returning employees.	
	Resolve requests for additional leave, accommodation or additional time off.	
	Address continued accrual and seniority issues occurring during lay-off.	
New Terminations Priority Level and Assigned to	Task	Status
	Consider selection criteria to avoid claims of disparate impact on protected classes of employees.	
	Consider impact of termination on benefits, such as the partial termination of a qualified retirement plans and reporting obligations.	
	Consider severance eligibility under employment contract and/or policy.	
	Consider paid time off benefits, and those that must be paid out at termination pursuant to local law.	
	If applicable, review employment and collective bargaining agreements to determine requirements for termination, severance eligibility, and other related issues.	
	Consider whether any customer contracts will be impacted by the termination of a key employee.	
	Consider whether the employee requires an accommodation to perform his or her job functions, and whether the organization has adequately engaged in the interactive process.	

Privacy		
Job Applicant & Employee Privacy Priority Level and Assigned to	Task	Status
	Map existing data privacy obligations under local data privacy laws and regulations.	
	Create notices for job applicants and employees, as appropriate under applicable local data privacy laws and regulations.	
	Consider developing job applicant and employee privacy policies, where appropriate.	
	Implement training and support for employees on data privacy issues and risks, including those associated with temperature screening and tracing applications, where appropriate.	
Third-Party Privacy Priority Level and Assigned to	Task	Status
	Map existing data privacy obligations under applicable data privacy laws at the local level, and as appropriate under applicable third-party vendor contracts.	
	Create appropriate notices for vendors and contractors as appropriate under applicable local data privacy laws and regulations.	
	Consider developing updates to existing privacy policies to include information collected from vendors.	
	Consider training for vendors on data privacy issues, including those relating to temperature screening procedures.	

Remote Working	Task	Status
	Consider whether remote working will be available for entire workforce, or limited set of workers, including those who are immune compromised, older or pregnant.	
	Consider whether the business will grant requests for remote working as an accommodation.	
	Update and revise time-keeping policies to address remote working, off-the-clock working, and other remote working time keeping issues.	
	Update existing, or create new business reimbursement expense policy to align with local law.	
	Update existing, or create new policies relating to cybersecurity and data privacy for remote workforce.	
	Update existing, or create new onboarding documents for remote workforce.	
Wage & Hour	Task	Status
	Review and update incentive programs to account for COVID-19 changes.	
	Review and update sales commission plans to adjust for COVID-19 changes.	
	Update policies to address waiting time associated with physical distancing and screening measures.	
	Update policies to emphasize prohibition against off-the-clock work.	
	Review and consider staggered scheduling to promote physical distancing.	
	Update policies to account for new breaks available under local laws and regulations.	



### **ABOUT DENTONS**

Dentons is the world's largest law firm, connecting talent to the world's challenges and opportunities in more than 75 countries. Dentons' legal and business solutions benefit from deep roots in our communities and award-winning advancements in client service, including Nextlaw, Dentons' innovation and strategic advisory services. Dentons' polycentric and purpose-driven approach, commitment to inclusion and diversity, and world-class talent challenge the status quo to advance client and community interests in the New Dynamic.

dentons.com

© 2020 Dentons. Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. This publication is not designed to provide legal or other advice and you should not take, or refrain from taking, action based on its content. Please see dentons.com for Legal Notices.