



Counseling Report Process

Purpose & Scope

This SOP establishes the proper process for issuing, approving, and documenting all Employee Counseling Reports, including Verbal, Written, and Final reports. It ensures that counseling is conducted consistently, fairly, and professionally, with appropriate oversight and documentation at each step. This procedure applies to any leaders authorized to issue counseling reports and provides clear guidance on roles, responsibilities, and required approvals throughout the process.

Definitions

- **Verbal Counseling Report:** Used for minor or first-time issues requiring a disciplinary response. The goal is to have a constructive, respectful discussion and document the issue. Example: A dress code violation is addressed with a conversation, and an Employee Counseling Report is completed afterward.
- **Written Counseling Report:** Used for repeated or more serious violations of company rules. This report carries more weight than a verbal counseling report and should be conducted with a witness present. It creates a documented, constructive dialogue about the issue. Example: An employee repeatedly arriving late, impacting operations, is addressed in a written counseling report.
 - *A witness must hold a higher-level position than the employee being documented and cannot be a peer. For example, a Store Manager requires a General Manager or above as a witness; a Shift Leader requires a Store Manager or above.*
- **Final Counseling Report:** Reserved for the most serious violations or repeated misconduct where previous counseling has not corrected behavior. Any further violations after a final counseling report may result in termination of employment. Example: Ongoing safety violations despite prior counseling are addressed with a final counseling report.

Roles & Responsibilities

- **Manager (Issuing Party)**
 - Addresses the issue with the employee.
 - Completes the Counseling Report form on the intranet.
 - Ensures accuracy and detail.

Revised: February, 2026

- **Area Director**
 - Reviewer and approver.
 - Reviews for policy alignment, tone, and appropriateness.
- **Human Resources**
 - Reviewer and approver.
 - Reviews for policy alignment, tone, and appropriateness.
 - Ensures coaching language and legal compliance before it is shown to the employee.
- **Employee**
 - Signs after review and conversation with management.

Process Overview

Step 1 — [Submit Counseling Report Form](#) (Intranet)

- Manager completes and submits the counseling report form found on the intranet.

Step 2 — Area Director (AD) Approval

- AD receives the form and reviews it for accuracy and appropriateness.
- Approves/Denies the report and retains a copy.

Step 3 — HR Approval

- HR receives the form and reviews tone, language, compliance, and documentation quality.
- Approves or denies the report. HR will contact the manager if the form is denied.

Step 4 — Manager Presents to Employee

- Only after **HR approval**.
- The manager meets with the employee and a witness (as required).
 - *A witness must hold a higher-level position than the employee being documented and cannot be a peer. For example, a Store Manager requires a General Manager or above as a witness; a Shift Leader requires a Store Manager or above*

Step 5 — Signatures

- Manager signs in the issuing field.
- Employee signs.
- In the event an employee declines to sign, note the refusal on the form. Under no circumstances should a manager or supervisor sign on behalf of an employee. Such action may constitute falsification of company records and could lead to disciplinary action, up to and including termination of employment.

Step 5 — Final Submission/Record Keeping

- RD, ADs, Facilities manager, and HR will be emailed a signed version of the counseling report.

Documentation Standards

Include:

- Facts, not opinions.
- Dates/times/locations.
- Specific policy violation or expectation.
- Corrective actions and follow-up timeline.
- Avoid: “I feel” / “I think” statements and emotional or accusatory language.

Record Retention

- Stored with HR, reporting managers, and Regional Directors.
- Remains available for progressive discipline or performance planning.

When to Contact HR Immediately

- If the final report is being considered.
- If no witness is available.
- If the issue involves harassment, safety, discrimination, or potential termination.

Questions? If you have any questions, please contact your designated HR Generalist or the HR Department at HR@whitewatercw.com.