Standard Operating Procedure (SOP):
Employee Relations Investigations

Department: Human Resources
Last Updated: June 2026
Prepared by: VP, Human Resources

Purpose
To establish a standardized process for conducting employee relations investigations consistently, professionally, and in compliance with applicable laws and company policies.

Scope
This SOP applies to all Human Resources personnel, field leadership, and designated investigators responsible for handling workplace complaints or investigations.

Definitions
Employee Relations (ER) Investigation: A structured review conducted by Human Resources to determine facts related to a workplace complaint, allegation, or policy concern.
Complainant: The individual reporting or raising a concern.
Respondent: The individual alleged to have engaged in misconduct or policy violations.
Witness: Any individual who may have relevant knowledge or information related to the investigation.
Evidence: Any documentation, communication, recording, photograph, video, schedule, or other information relevant to the investigation.
AI-Assisted Transcription: Company-approved transcription technology used to convert investigation interviews into written transcripts for documentation purposes.

Roles & Responsibilities

Function	Responsibilities
HRBP / HR Representative	Lead investigations; Conduct interviews; Collect evidence; Maintain documentation; Escalate concerns appropriately.
HR Leadership (VP or Sr. Director)	Review investigation findings; Provide guidance on complex investigations; Approve high-risk corrective actions.
Operations Leadership	Support logistics and scheduling; Preserve evidence when requested; Maintain confidentiality.

Procedure
Step 1: Intake & Initial Assessment
1.1 Receive Complaint
Complaints may be received through a variety of channels, including phone calls, emails, in-person discussions, or leadership escalations. This is not intended to be an exhaustive list, as concerns may arise through other reporting methods or operational interactions. All complaints, regardless of how they are received, should be treated seriously, documented appropriately, and routed to HR for assessment and next-step determination.

1.2 Acknowledge Concern

The investigator should acknowledge the concern professionally and respectfully by thanking the team member for coming forward and explaining the general investigation process, including what to expect during the review. The investigator should avoid promising specific outcomes or guarantees regarding findings or corrective action. Confidentiality expectations should be discussed, including the need to share information only with individuals who have a legitimate business need to know. The investigator should also reinforce the company's non-retaliation expectations and advise the team member to report any perceived retaliation immediately.

1.3 Gather Initial Information

The investigator should gather and document all relevant preliminary information related to the concern, including who was involved, what allegedly occurred, when and where the incident took place, and the names of any potential witnesses. The investigator should also identify whether there have been any prior related concerns or complaints and determine what evidence may be available, including documents, messages, video footage, schedules, or other supporting materials relevant to the investigation.

1.4 Risk Assessment

The investigator should conduct an initial risk assessment to determine whether immediate interim action is necessary to protect team members, preserve the integrity of the investigation, or reduce operational risk. Depending on the nature of the allegation, this may include schedule separation, administrative leave, implementation of safety precautions, preservation of evidence, or escalation to appropriate HR or operational leadership. Interim measures should be based on business necessity and should not be interpreted as a determination of wrongdoing.

1.5 Leadership Notification

When operationally necessary, the respondent's direct manager, Area Director, Regional Director, or other applicable operational leadership may be notified that an investigation is being conducted. Information shared should be limited to what is necessary to support business operations, scheduling, interim measures, or investigation logistics.

Operational leaders are not authorized to conduct independent fact finding, interview witnesses, review evidence, or otherwise investigate concerns unless specifically directed by Human Resources. All evidence collection, witness interviews, and investigation determinations remain the responsibility of HR.

Leaders receiving notification of an investigation are expected to maintain confidentiality, avoid retaliation or perceived retaliation, and immediately escalate any additional concerns or information received during the investigation process to HR.

Step 2: Documentation & Case Setup

2.1 Case Logging & Tracking

Upon receipt of a complaint or initiation of an Employee Relations investigation, the investigator must promptly enter the matter into the Company's ER Tracker. The tracker should include, at a minimum, the date received, reporting party (if applicable), respondent, location, assigned investigator, allegation category, and current investigation status.

The ER Tracker is intended to support investigation oversight, trend analysis, workload management, and documentation consistency. Investigation entries should be updated throughout the investigation lifecycle as material developments occur.

2.2 Open Investigation File

The investigator should create and maintain a confidential investigation file for each reported concern within the Company's designated secure Google Drive investigation repository. The file should contain all relevant investigation materials, including the intake summary, investigation timeline, witness list, evidence log, interview notes, interview transcripts, and final findings summary. Additional supporting documentation may also be included as appropriate.

Investigation files must be organized consistently, maintained securely, and shared only with individuals who have a legitimate business need to know. Access permissions should be limited appropriately to preserve confidentiality and investigation integrity.

2.3 Review Relevant Records

The investigator should review all applicable records and supporting information relevant to the allegation or concern. This may include prior counseling or corrective action records, employment history, scheduling and timekeeping records, prior complaints, applicable company policies, and available camera footage or surveillance access. Additional records or operational data may also be reviewed as necessary to ensure a thorough and objective investigation.

Step 3: Conduct Interviews

3.1 Witness Interviews

The investigator should interview relevant witnesses as promptly as practical to ensure information is collected while details remain fresh and to minimize operational disruption. During witness interviews, the investigator should utilize open-ended questions to encourage detailed responses, avoid leading or suggestive questioning, and clarify any inconsistencies or gaps in information as they arise. Written statements may be obtained when appropriate based on the nature of the allegation, the complexity of the matter, or at the investigator's discretion.

3.2 Recording & AI Transcription

When recording or transcription tools are utilized during an interview, the investigator should notify all participants at the beginning of the discussion that the interview is being recorded and/or transcribed. Only company-approved systems and platforms may be used for recording or transcription purposes. All recordings, transcripts, and related files must be stored securely in accordance with company confidentiality, data retention, and investigation recordkeeping requirements.

Suggested script:
For documentation accuracy, this interview may be recorded and transcribed using company-approved technology. The information will remain confidential to the extent possible and used only for investigation purposes.

3.3 Respondent Interview

Once sufficient preliminary information has been collected, the investigator should interview the accused team member to provide an opportunity for response and clarification. Allegations should be presented factually, professionally, and neutrally without assumptions or conclusions regarding the outcome of the investigation. The team member should be given a reasonable opportunity to respond to the allegations and provide any supporting information, documentation, or evidence they believe is relevant.

HR leadership should participate in or provide oversight for high-risk, sensitive, or potentially high-liability investigations when appropriate.

Step 4: Evidence Collection

The investigator should collect and review all applicable evidence relevant to the allegation or concern. This may include written statements, text messages, emails, camera footage, scheduling records, timekeeping records, photographs, and prior disciplinary or corrective action records when relevant to the investigation. Additional supporting documentation or operational records may also be reviewed as appropriate based on the nature of the concern.

An evidence log should be maintained throughout the investigation to document all materials collected and reviewed. At a minimum, the log should identify the source of the evidence, the date it was obtained, its relevance to the investigation, and the location where the information or file is securely stored.

Step 5: Findings & Determination

5.1 Analyze Information

Upon completion of fact gathering, the investigator should analyze the information collected to determine whether the allegations were substantiated based on the available evidence and credibility of information obtained during the investigation. The investigator should assess whether company policies, standards of conduct, or workplace expectations were violated and determine whether any additional investigation steps, interviews, or evidence collection are necessary before reaching a final conclusion.

5.2 Investigation Summary

The investigator should prepare a findings summary documenting the overall outcome of the investigation. The summary should include a description of the allegations reviewed, the investigation steps taken, the evidence and documentation reviewed, key factual findings, and any relevant credibility considerations identified during the investigation process. The findings summary should also outline recommended next steps, including corrective action recommendations, policy or operational recommendations, or any additional follow-up deemed appropriate based on the investigation outcome.

5.3 Leadership Review

Review findings with HR leadership prior to implementing high-risk corrective action.

Step 6: Resolution & Follow-Up

Possible outcomes following an investigation may include no action, coaching, counseling, written warning, final warning, performance improvement plan, termination of employment, additional training, or ongoing monitoring and follow-up. Corrective action decisions should be based on the facts of the investigation, the severity of the conduct, prior history where applicable, consistency with company policy and practice, and consultation with HR leadership as appropriate.

6.1 Corrective Action Review
Human Resources should partner with applicable operational leadership when determining and implementing corrective action arising from an investigation. Operational leadership may provide input regarding performance history, operational impact, consistency within the region or department, and feasibility of corrective action implementation.

Final corrective action decisions should be made ***collaboratively between HR and operational leadership***, with HR leadership retaining oversight for high-risk, sensitive, or potentially high-liability matters. Operational leaders are responsible for appropriately administering and reinforcing corrective action in partnership with HR.

6.2 Communication
Communicate outcome information on a need-to-know basis only. Do not disclose confidential disciplinary details beyond what is operationally necessary.

6.3 Retaliation Monitoring
Monitor for retaliation concerns following closure of the investigation.

Documentation & Records
All investigation documentation must be stored securely and maintained in a confidential manner consistent with company expectations and applicable legal requirements. Investigation records should be retained in accordance with company document retention practices and should only be accessible to individuals with a legitimate business need to know. If litigation, administrative claims, or government agency action is anticipated or pending, all related records and evidence must be preserved in accordance with applicable legal hold or records preservation requirements.

Compliance & Audit
HR leadership may periodically audit investigation files to assess documentation quality, timeliness of investigations, consistency in investigative practices and outcomes, compliance with applicable legal and company requirements, and the appropriate use of AI-assisted transcription or recording tools. Audits may also be used to identify training opportunities, process improvements, and areas requiring additional oversight or standardization.

Revision History

Date	Description	Owner
June 2026	Initial creation and rollout of	HR Department

Disclaimer:
This Standard Operating Procedure (SOP) is intended to provide general guidance and does not create a contract, express or implied. The Company reserves the right to modify, suspend, or discontinue this SOP at any time, with or without notice. Where state or local law differs from this policy, the Company will follow the requirements of the applicable jurisdiction.