

# Social Movements and HR: The Impact of #MeToo

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# I. Methodology

The findings of this research project are based on interviews conducted from September – November 2018 with 46 Human Resources (HR) and General Counsel leaders at 33 national and international companies within thirteen industries. Each interview lasted approximately 45 minutes and sought to understand the impact of the #MeToo movement in the workplace. The interviews included questions addressing changes to corporate culture, leadership, sexual harassment policies and reporting mechanisms, and prevention training, as well as the broader impact on the HR profession. To supplement interview data, companies also completed a 20-question survey, providing details on sexual harassment policies, reporting mechanisms, and prevention training. We also retrieved information from other sources, including journal publications, academic studies, the Pew Research Center, the American Psychological Association, and the US Equal Employment Opportunity Commission (EEOC).

For the purpose of this report, we will assume the EEOC’s definition of sexual harassment as any “unwelcome verbal, visual, or physical conduct of sexual nature that is severe or pervasive and effects working conditions or creates a hostile work environment.”

## II. The #MeToo Movement

### *#MeToo in Society*

#MeToo is a social media hashtag that started on October 15, 2017 by Alyssa Milano. Originally coined by Tarana Burke, “Me Too” is a phrase used to empathize with sexual assault survivors.<sup>i</sup> #MeToo has inadvertently expanded that purpose to raise awareness of the pervasiveness of sexual assault and harassment in our society and to provide a public platform for discussing it. The discussion has since left the confines of social media and entered mainstream media, businesses, schools, and government.

Reactions to #MeToo have varied. Some view the #MeToo movement as “a national reckoning about sexual harassment.”<sup>ii</sup> Pew Research Center, in a study published in April 2018, found that 59 percent of women and 27 percent of men have personally received unwanted sexual advances of a verbal or physical nature. Given the sudden rise of the discussion, and the scores of individuals who have been investigated, fired, and/or arrested, many survivors of sexual assault and harassment felt hope that society would take this issue more seriously.

### *#MeToo in the Workplace*

Many others see #MeToo in a different light. Pew found that 51 percent of adults in the US say the increased focus on sexual harassment and assault has made it harder for men to know how to interact with women in the workplace. A recent Bloomberg article reported that “across Wall Street, men are

adopting controversial strategies for the #MeToo era and, in the process, making life even harder for women.”<sup>iii</sup>

Considering the increased societal attention given to sexual harassment and assault, and the wide range of reactions to #MeToo, we wanted to know how companies are reacting, whether they are changing their policies and practices, and whether the societal movement is impacting company culture. The highlights of our study show opportunities in culture, leadership, policy and reporting formulation, and training practices. During our study, we also found innovative practices that could be replicated across companies. Lastly, we have included a self-assessment tool to measure progress in addressing sexual harassment and assault within an organization (Appendix I).

### III. Culture

#### *Research Findings*

As sexual harassment is either permitted or prevented by organizational culture, we started each interview by asking representatives: *how would you describe your company's culture as it relates to dealing with sexual harassment in the workplace?* Though companies were quick to define their overall corporate culture – diversity and inclusion, respect, and integrity were the most frequently espoused values – they were less apt to define their corporation's culture as it related to dealing specifically with sexual harassment. This is problematic because if an organization does not have a distinct espoused value for addressing and preventing sexual harassment, it may have a difficult time evaluating enactment.

Additional insights emerged from our research. First, our research indicated that the #MeToo movement had affected corporate culture, as 79 percent of firms reported distinct differences, and of this change, enhanced dialogue (42 percent), awareness (35 percent), and procedural review (23 percent) were cited most often.

- *Employees are getting involved.* One company we spoke to noted that employees are demanding more transparency around the definition of what constitutes sexual harassment. Another noted that employees now have a better understanding that sexual harassment is not always blatant.
- *Boards are addressing the movement.* Sixteen percent of organizations we interviewed said their Board of Directors is taking an interest in this topic. One organization noted that their Audit Committee has begun to ask more pointed questions.
- *Companies are actively listening.* One firm responded to the movement by immediately conducting listening sessions with employees to better gauge sentiment and understand what else is needed in this space. Another firm is exploring ways to continue the dialogue at a heightened level.

Firms also noted an impact on reporting. In the survey, some 35 percent noted an increase in the number of reports being made since the movement began, though this does not necessarily correlate to increased substantiation rates. Of firms experiencing an increase, 82 percent reported a minimal increase, while eighteen percent highlighted a significant increase, with reports doubling at more than one firm. We can attribute this to several factors. Employees may have been compelled to report based on incidents popularized in the media. Similarly, corporate Speak Up campaigns may have encouraged the reveal of older or long-term cases, or the reporting of inappropriate conduct prior to it becoming egregious conduct. An increase in reports is also in line with national trends. The EEOC reported a twelve percent increase in the number of charges filed from 2017 to 2018,<sup>iv</sup> and NAVEX Global, the ethics and compliance software platform, noted an eleven percent increase in Discrimination and Harassment reports in the fourth quarter of 2017.<sup>v</sup>

We also discovered that companies are committed to change. In interviews, 49 percent of firms noted a desire to change their culture as it relates to dealing with sexual harassment in the workplace. Of these companies, a desire to welcome feedback at all levels of the hierarchy (56 percent), address issues of power, gender, and diversity and inclusion that lend to harassment (35 percent), and encourage bystander intervention (25 percent) were noted most frequently.

### *Recommendations*

The events of the past year suggest that the #MeToo movement is here to stay. While companies cannot simply replace deeply-embedded elements of their culture, gradual improvements can continue to be made if they:

- **Remove sexual aggressors.** Separating from known perpetrators sends a powerful signal to employees and the general public that the company is ethical and does not tolerate misconduct. This action should be taken regardless of status, as research suggests that minimizing sexual harassment by star employees may affect victims more than the harassment itself.<sup>vi</sup> Further, a recent Pew Research Center study has found that individuals are more concerned that men will get away with committing sexual harassment than with men being fired prematurely.<sup>vii</sup>
- **Identify the root cause.** Organizations must reflect on the few critical elements of their culture which enable abuse. As we have seen from recent high-profile cases at Google<sup>viii</sup> and Nike,<sup>ix</sup> employees are often the ones leading this reflection initiative. Companies should make the necessary changes, and quickly demonstrate the impact on business results for buy-in.
- **Get ahead of unintended consequences.** In several instances in our research, we discovered the presence of a “chilling effect”, where men were hesitant to interact with women in a professional environment. One company we interviewed highlighted an incident where a junior male employee refused to attend one-on-one meetings with his skip-level female manager for fear of potential sexual harassment allegations being made.

The backlash is often much subtler, however. In a recent survey conducted by Lean In, nearly half of male managers surveyed were uncomfortable engaging in common work activities with a female, such as mentoring, working alone, or socializing.<sup>x</sup> This response is detrimental to the professional development of women, and firms should develop formal mixed-mentorship programs that meet in a safe space. They can also ensure that gender parity and inclusion are elements in managerial performance evaluations.

Similarly, companies should proactively avoid retaliation, which is the EEOC's most frequently alleged discrimination (49 percent of claims in 2016), against victims and their allies. Companies should monitor work conditions through climate surveys during and after an investigation to determine if the inappropriate behavior has curtailed.

- **Recognize the diversity of victims.** Sexual harassment is not always perpetrated by a male to a female victim. In a Quinnipiac University national poll, one in five male voters had experienced sexual harassment in the workplace, and in 2018, nearly sixteen percent of EEOC charges were filed by men.<sup>xi</sup> Companies should be cautious of few or no reports from male victims, as the stigma to report sexual harassment may be even greater for males.

## IV. Leadership

### *Research Findings*

We asked companies: *who takes ownership of sexual harassment prevention in your company?* Almost all companies reported that their HR department takes ownership of sexual harassment and assault prevention, nearly 85 percent said their CEO takes ownership of it, and around 78 percent said their executive leadership (other than the CEO) takes ownership of it. During our research, we found that when managers and employees act as guardians against sexual harassment behavior, the behavior decreases, as employees subsequently receive the confidence to act as their own guardians.<sup>xii</sup> However, our data shows that only 56 percent of companies report that their managers take ownership of this issue, and only 39 percent of companies said their employees take ownership (Appendix II).

Other trends emerged from our research. We discovered that extrinsic factors were used to motivate managers and employees to take sexual harassment prevention and response seriously. 97 percent of companies we surveyed stated they hold their managers accountable for sexual harassment prevention and response. As one firm put it, "every worker is accountable, and every leader knows what's expected."

We also noted a correlation between the roles Diversity and Inclusion and Compliance teams play in ensuring managerial and employee ownership of sexual harassment prevention. Of the fifteen firms that stated their Diversity and Inclusion team takes ownership of sexual harassment prevention, fourteen (93 percent) also said that their managers take ownership. This was followed closely by ownership by Compliance. Of the eighteen respondents who indicated that their Compliance division

owns sexual harassment and assault prevention, sixteen (88 percent) also said that their managers take ownership. Compare that with the responses from organizations that say the CEO or HR (the most common in our sample) takes ownership of sexual harassment prevention, and we see that only 63 percent and 57 percent, respectfully, also say their managers take ownership of it.

Similarly, of the fifteen firms that stated Diversity and Inclusion takes ownership of prevention within the workplace, ten (67 percent) also said their *employees* take ownership. For Compliance, we found a rate of 61 percent. Compare that with the responses that say the CEO or HR takes ownership of it, and we see that only 48 percent and 43 percent, respectively, also say their employees take ownership. Interestingly, firms that stated their CEO, HR, or Legal *does not* take ownership also indicated their employees do not take ownership. This suggests that CEO, HR, and Legal ownership are necessary to drive ownership to the front-lines of organizations.

Our interviews also uncovered a hesitancy at some firms to discuss the movement in the workplace. Since #MeToo has wide media coverage, we asked: *who owns the dialogue around sexual harassment prevention and #MeToo within the company?* What we found was unexpected – while 64 percent of companies said HR drives the conversation, and 55 percent said either their CEO or another executive drives the conversation, twelve percent said that they do not have that discussion within the company. One company stated that there was, “no need to change [our policy or practices] just because of a hot-button issue.”

### *Recommendations*

To ensure that leadership is a powerful lever in advancing change, we suggest that companies:

- **Embrace diversity.** Executive diversity is becoming increasingly important. When we consider our observations and external workplace sexual harassment research, we believe there is a clear benefit to increasing gender parity in the leadership ranks of an organization.<sup>xiii</sup> The benefits range from increased employee comfort in reporting sexual harassment behavior to increased levels of sexual harassment prevention within the organization. We recommend organizations pursue gender parity, especially at senior levels.
- **Empower managers and frontline employees.** Sexual harassment prevention ownership among managers and employees is key to preventing this behavior within organizations, and we recommend leadership help shift their role from one of accountability to one of ownership. One company we spoke to is developing a pilot in Asia to encourage junior employees and middle-management to speak up about sexual harassment within a hierarchy.
- **Talk about it!** Though this is a difficult topic, open dialogue is important for raising awareness, especially as the EEOC has identified coarsened social discourse outside the workplace as an environmental risk factor for increased instances of sexual harassment and assault.<sup>xiv</sup> Some firms took this approach, with one interviewee stating, “we don’t leave what’s going on in the world in the parking lot.” Another company has ramped up the dialogue on

sexual harassment because of the impact on employees, and yet another company invited a leader of the #MeToo movement to speak with employees. We also recommend that executives in organizations lead or facilitate discussions on the issue. One company that we spoke to posts anonymized hotline complaints, while another publishes anonymized outcomes of cases for all employees to see. Such actions serve a similar purpose as open dialogue: raise organizational awareness of sexual harassment and assault.

## V. Policies

### *Research Findings*

In our survey, we asked: *does your company have a sexual harassment policy for all employees, contracted employees, and third parties?* We discovered that policies are lacking for non-traditional workers and third parties. While 97 percent of firms interviewed had a sexual harassment policy for employees, fewer had sexual harassment policies for contract workers (77 percent) and third parties (58 percent). As contract workers comprise nearly one-fifth of the workforce, and EEOC regulations state that a company can be liable for the actions of non-employees with respect to the harassment of its own employees, companies should be proactive and ensure their policies mirror reality.

However, we did determine that firms are following best practices in developing and revising their policies, as few firms have zero tolerance policies and policies are revised frequently. Of the firms that did have sexual harassment policies, 90 percent indicated that they did not have a strict zero tolerance policy, where any behavior that violates the policy results in immediate termination of employment. Instead, these firms have policies where appropriate action, up to and including termination, is taken if claims are substantiated, which is in line with EEOC guidelines that suggest that zero tolerance policies may make it more difficult to combat sexual harassment, as employees may be unwilling to report in a system that is perceived as unfair.

Policies are also revised frequently. Most firms updated their sexual harassment policies within the past year, with the majority, 43 percent, revising in the last six months and an additional 33 percent revising in the last six to twelve months. Companies should continuously review existing policies as new case rulings are published, state laws change, and internal discrimination issues arise, and should reinforce revisions through training and traditional distribution means, such as handbooks, intranet, newsletters, and physical posters.

### *Recommendations*

To ensure that sexual harassment policies are resilient, we recommend that organizations:

- **Consider related policies.** Organizations should ensure other corporate policies, including relationship, alcohol, social media and texting, and event, reinforce the expectations outlined in the sexual harassment policy and cover employees on non-company property and/or non-

work hours. One company we spoke to has the highest-ranked executive responsible for employee conduct at each event.

- **Prioritize the employee experience.** The most progressive companies that we interviewed ensure that the process is as transparent as possible for both the victim and accused. To ensure that victims are not further silenced, companies should also remove mandatory employee arbitration clauses that forbid victims from filing lawsuits for sexual assault, harassment, and discrimination. And to promote healing, organizations can create an employee benefit plan that provides funds for treatment, including counselors, therapists, and advocates, without an out-of-pocket cost to those who have experienced workplace harassment. Employers should couple this with a policy that allows workers to take time off to attend counseling.
- **Keep language friendly and simple.** One firm we spoke to is co-creating their policy with various employee groups, including managers, women, and millennials, so that it is a “living, breathing document.” Yet another organization is stress testing language specifically with junior employees. Most policies we read were also less than two pages, and particularly effective policies included real-life examples that resonated with the organization’s culture.

## VI. Reporting Mechanisms

### *Research Findings*

We asked in our survey: *which channels are available for employees to report sexual harassment?* There was not significant variation in responses. All firms allowed for anonymous reporting via hotline and non-anonymous reporting via a manager and HR, and a large majority of firms – 93 percent – allowed employees to file a complaint through Legal. Roughly 40 percent of firms allowed for employees to file a complaint through an intranet.

However, we were able to uncover unique mechanisms in our interviews. One company has a Business Integrity department, separate from their Compliance team, where individuals can report instances of sexual harassment. Another firm has a “Talk it Over” advice line where employees can anonymously review gray matters with an HR representative, who recommends appropriate courses of action.

### *Recommendations*

To ensure employees have sufficient trust in reporting mechanisms, employers can:

- **Hire an ombudsperson.** Individuals may hesitate to report sexual harassment if they believe that HR is solely a representative of management. A neutral ombudsperson, reporting directly to the Board of Directors, may alleviate tensions by helping employees to analyze complex matters and clarify needs, as well as helping companies to reduce complaint investigation and



litigation costs. Only four of the organizations we interviewed – and thirteen percent of companies nationwide – have an ombudsperson.<sup>xv</sup>

- **Consider emerging technology.** Startups, many with female founders, have emerged in the wake of the #MeToo movement with tools to empower individuals in the workplace.<sup>xvi</sup> *Callisto Expansion*, a documentation and reporting platform available for professional environments, coordinates victims who have been assaulted by the same perpetrator and allows access to an options counselor. *tEquitable*, an independent, tech-enabled ombud, helps employees explore options for resolving conflicts through consultation and coaching. *AllVoices*, an anonymous reporting tool, allows employees to submit reports of harassment directly to the CEO and Board of Directors. By taking advantage of this technology, HR departments can continue to root out repeat offenders and gain needed allies.

## VII. Prevention Training

### *Research Findings*

In our survey, we asked companies to identify segments of their employee population that received sexual harassment and assault prevention training, and how often training was received. 61 percent reported employees receive training annually, while twelve percent said training occurs more than once per year and nineteen percent said training occurs less than once per year. One company indicated that they train employees on an ongoing basis.

We also asked which employee segments receive live and which segments receive online training. Fifteen respondents provide live training, most of whom provide the training to their executives and managers, and only a quarter of whom provide it to all employees. Interestingly, one company reported some of their business lines have requested more live trainings for their employee groups since #MeToo began. Another company commented during our interview that, “whenever we push training, we get more questions on the topic.”

In contrast, 29 respondents reported that they provide online training. Of the 29, 62 percent said they provide it to their executives, 72 percent said they provide it to their managers, and 93 percent said they provide it to their employees. Interestingly, 21 percent said they provide it to their contracted employees and seven percent said they provide it to third-parties.

### *Recommendations*

In order to best educate employees on company policies and make certain that behaviors are changed, companies should:

- **Refresh training.** For optimal effectiveness, companies should customize training to their cultural context, as well as learners’ beliefs and self-reported behaviors. Companies can

improve engagement by providing training to smaller audiences, separating employees and managers, including a variety of scenarios – including same-sex harassment and harassment by females – and real-world testimonials and consequences as content. Firms can also consider delivering training in quarterly micro-learning sessions, instead of annual sessions.<sup>xvii</sup> To make sure that training knowledge is transferred to the workplace, employers should send follow-up emails to reinforce key points, post visual cues, like posters, and allow employees to practice skills and discuss their experiences implementing.<sup>xviii</sup>

- **Provide training to non-traditional workers.** Training contracted workers and third-parties helps reinforce culture and expected conduct. Research also indicates that contracted workers are more vulnerable to sexual harassment, as they have relatively less power within an organization, and, in many cases, are less apt to report due to financial instability.<sup>xix</sup>
- **Consider bystander intervention training.** While researchers have identified a Bystander Effect that causes individuals to fail to speak out against sexual harassment, in many cases, a perilous situation can be diffused by a bystander.<sup>xx</sup> Five companies we interviewed provide bystander intervention training and require witnesses of sexual harassment to speak up, and an additional three plan to implement bystander intervention trainings and policies. When implemented, training should create a sense of responsibility and empowerment, and provide resources on how to speak up without being confrontational.<sup>xxi</sup>
- **Monitor external trends.** In the wake of #MeToo, certain government entities have implemented new laws addressing sexual harassment in the workplace. New York State, for example, requires employers to provide interactive sexual harassment prevention training. Many of the firms we spoke with indicated they completed internal policy reviews more than a year ago, before many of these new laws were implemented. Some have also stated that they continue to evaluate their policies in-step with the changing regulations. Since these laws came into force relatively swiftly, we recommend employers ensure their internal policies align with new local and state regulations.

## VIII. Making the Case for Prevention

Research suggests that there is a compelling business case for preventing sexual harassment in the workplace.

### *Corporate Costs*

The direct costs of sexual harassment litigation are staggering. Between 2010 and 2017, employers paid more than \$600 million during the EEOC's pre-litigation enforcement process to employees who alleged harassment – with the average claim resulting in \$75,000 - \$125,000 in damages.<sup>xxii</sup> Average employee damages for sexual harassment more than doubles when settled in court. The indirect costs are similarly severe, and affect a company's productivity, retention, and reputation. Female victims of

sexual harassment are nearly seven times more likely than non-victims to change jobs,<sup>xxiii</sup> teams affected by harassment lose an average \$27,435 per person in productivity,<sup>xxiv</sup> and potential candidates are significantly less likely to apply if they believe an organizational culture permits harassment.<sup>xxv</sup> One study estimates that the combined impact of indirect costs exceeds six million dollars per Fortune 500 company.<sup>xxvi</sup>

### *Individual Costs*

Organizations should also consider the effect of sexual harassment at the employee-level. Even when relatively minor, harassment in the workplace can lead to depression, significant and lasting mental and physical health effects,<sup>xxvii</sup> and an increased likelihood of workplace accidents.<sup>xxviii</sup> Victims of sexual harassment may also have reduced on-the-job development,<sup>xxix</sup> resulting in less opportunities for professional advancement, financial stress due to frequent job change, and, in some cases, exit from their industry entirely.<sup>xxx</sup>

## **IX. Conclusion**

Throughout our research, it was clear that the #MeToo movement had made an indelible impact on the HR profession at partner companies, prompting a wide scale review of policies, procedures, and cultural norms, and ushering in needed changes to better meet employee expectations. But how will the #MeToo movement continue to affect the future of HR? We've already seen that organizations are getting ahead of risk by having a centralized Employee Relations function – 84 percent of the organizations we surveyed were structured this way – but it is clear that more work is needed to rebuild lost trust and improve the skills necessary to conduct quality investigations. Now is also the time for the profession to clarify misconceptions about their role, focusing on developing a reputation as a trusted consultant and advisor, implement strategic diversity initiatives, and further a transparent and safe environment.

# Appendix I: Progressive Evaluation Framework

We have developed a framework to allow organizations to assess progress towards addressing and preventing sexual harassment in the workplace. As results may vary based on business segment or location, we recommend that multiple leaders complete the assessment for a more accurate depiction of climate.

SEXUAL HARASSMENT PREVENTION EVALUATION					
#	Factor	1	2	3	Score
<b>CULTURE</b>					
1	<b>Has your company discussed, or encouraged the discussion of, sexual harassment in public forums?</b>	My company has not discussed and/or does not encourage the discussion of sexual harassment in public forums.	My company discusses and/or encourages the discussion of sexual harassment in public forums.	My company discusses and/or encourages the discussion of sexual harassment in public forums, and holds itself accountable to take actions based on the discussion.	
2	<b>Has your company identified the internal patterns and risks of sexual harassment?</b>	My company has not identified internal patterns and risks of sexual harassment.	My company has identified internal patterns and risks of sexual harassment.	My company has identified internal patterns of sexual harassment through predictive analysis and proactively mitigates risks.	
3	<b>Has your company disciplined employees for sexual harassment?</b>	My company has not disciplined, or has discreetly disciplined, employees for sexual harassment.	My company has disciplined employees for sexual harassment, and has provided some detail behind the reasoning and/or process to employees.	My company has disciplined employees for sexual harassment, and has made the reasoning and process fully transparent to employees.	

LEADERSHIP					
#	Factor	1	2	3	Score
4	Who claims ownership of sexual harassment prevention at your company?	HR, Legal, and/or Compliance claims ownership of sexual harassment prevention at my company. All employee groups are held accountable for reporting violations of law and policy.	HR, Legal, and/or Compliance claims primary ownership of sexual harassment prevention at my company, though there is some level of executive ownership. All employee groups are held accountable for reporting violations of law and policy.	All employee groups claim ownership of sexual harassment prevention at my company. All employee groups are held accountable for reporting violations of law and policy.	
POLICIES & REPORTING					
5	Is your company's sexual harassment policy considered zero tolerance?	My company has a strict zero tolerance policy.	My company does not have a strict zero tolerance policy, but takes appropriate disciplinary action for each case.	My company does not have a strict zero tolerance policy, but takes appropriate disciplinary action for each case and consistently reviews existing policy for optimal coverage.	
6	Has your company reminded employees of existing sexual harassment policies or resources since the #MeToo movement?	My company has not reminded employees of existing policies or resources since #MeToo.	My company has reminded employees of existing policies and resources since #MeToo.	My company has reminded employees of existing policies and resources, and has developed more robust policies and resources since #MeToo.	
7	Has your company considered that sexual harassment may be underreported?	My company has not considered, and does not believe, that sexual harassment may be underreported.	My company has considered that sexual harassment may be underreported.	My company believes that sexual harassment may be underreported, and is proactively determining where.	

PREVENTION TRAINING					
#	Factor	1	2	3	Score
8	Who receives sexual harassment prevention training at your company?	My company provides sexual harassment prevention training for some employee groups. Training meets legal requirements.	My company provides sexual harassment prevention training for all employee groups. Training exceeds legal requirements.	My company provides sexual harassment prevention and bystander intervention training for all employees, contract workers, and third-parties. Training exceeds legal requirements.	
9	How does your company ensure knowledge transfer following sexual harassment prevention training?	My company does not ensure knowledge transfer following sexual harassment prevention training.	My company occasionally plans for knowledge transfer before, during, and/or after sexual harassment prevention training.	My company actively plans for knowledge transfer before, during, and after sexual harassment prevention training.	
TOTAL COUNT		/9	/9	/9	

### Scoring

#### Frequent 1's: Compliant

Companies with scores in this range have developed policies, reporting mechanisms, and prevention trainings which meet the minimum requirements for compliance for traditional employees. While their cultural norms do not permit sexual harassment, these firms do not proactively determine the root causes of inappropriate behavior, mitigate risks by speaking out against sexual harassment, or reprimand inappropriate behavior. To better address and prevent sexual harassment, compliant companies should proactively review policies, encourage open dialogue, monitor underreporting, and seek feedback on progress from employees.

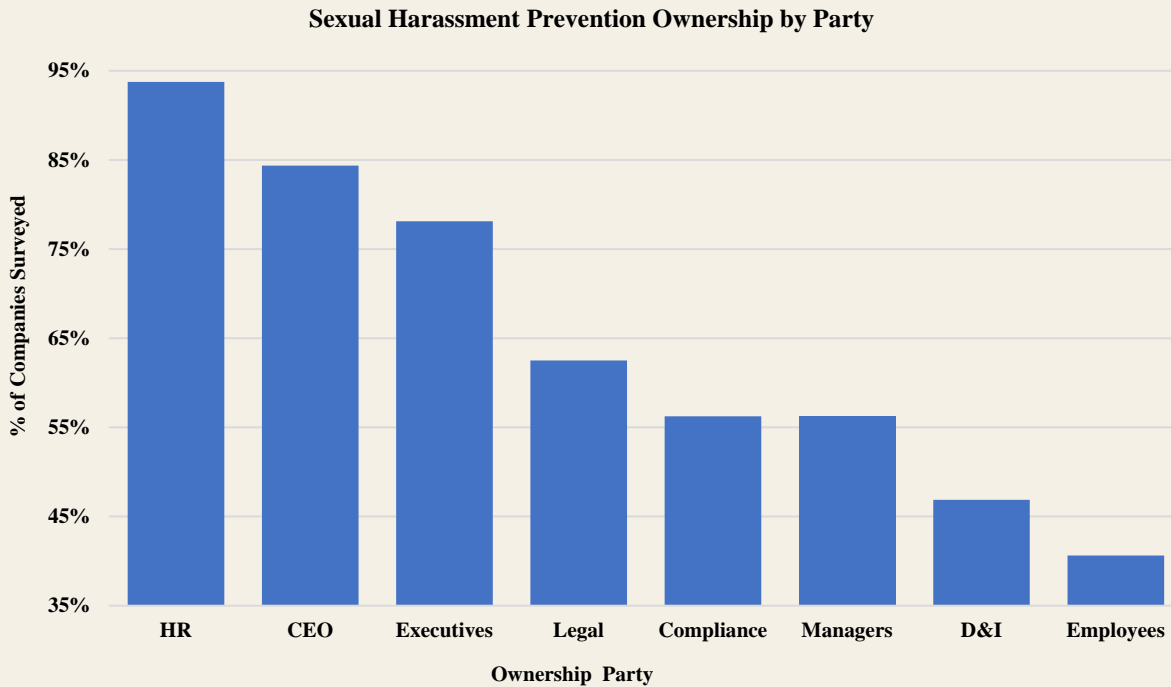
#### Frequent 2's: Proactive

Firms with scores in this range have developed – and frequently review – policies, reporting mechanisms, and prevention trainings which exceed the minimum requirements for compliance for traditional employees. As their cultural norms do not permit sexual harassment, these firms have determined the root causes of inappropriate behavior, have had top leadership speak out against sexual harassment, and have reprimanded inappropriate behavior. To better address and prevent sexual harassment, proactive companies should consider encouraging employee involvement in policy development, providing greater transparency in internal harassment cases, and encourage employee ownership of prevention.

### Frequent 3's: *Progressive*

Organizations with scores in this range have consistently developed innovative policies, reporting mechanisms, and prevention trainings which exceed the minimum requirements for compliance for traditional employees, contract workers, and third-parties – often in conjunction with these stakeholders. All employees are responsible for sexual harassment prevention, and bystanders are empowered to intervene in, and report, perilous incidents. As their cultural norms do not permit sexual harassment, these firms have proactively determined the root causes and future risks of inappropriate behavior through predictive analysis, organized regular conversations to speak out against sexual harassment, and have reprimanded inappropriate behavior while making the process transparent for all individuals. Progressive companies should continue to serve as industry leaders in shaping peer practices.

## Appendix II: Sexual Harassment Prevention Ownership by Party



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