Checklist for a Complete and Effective Harassment Policy:

- **Establish that the organization is committed to preventing harassment and discrimination.** A good policy clearly states that everyone can expect an environment free of harassment and discrimination, and that the employer will work to make sure this happens.
- **Explain who the policy covers.**
- **Strictly and specifically forbid any form of harassment and/or discrimination.** State that harassment based on race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, disability, or age is illegal and will not be tolerated.
  - Clearly define harassment and discrimination.
  - **Provide examples of prohibited conduct,** such as slurs, insults, off-color jokes, denigrating commentary or gestures, inappropriate touching or staring, suggestive photos, sexual overtures, promises of promotion or other benefits in exchange for sexual favors, or threats if such favors are not granted.
  - **Include conduct outside the organization’s traditional work environment,** such as behavior at related social events and comments posted on social media sites.
- **Describe in detail the consequences that will result from harassment or discrimination,** as well as consequences for false reports.
- **Provide a straightforward avenue for reporting,** without fear of retribution.
  - **Identify the compliance officers** to whom staff/volunteers may report prohibited conduct. Make sure employees have more than one person to bring complaints to, in case one of the complaint-takers is the one accused of misconduct.
  - Other reporting systems can include an anonymous web report and/or anonymous hotline.
- **State that confidentiality of those who report harassment will be protected to the greatest possible extent.**
- **Establish clear procedures for responding to reports and conducting investigations.** Also note that anyone who files a complaint will be notified about the status of their complaint, the results of the investigation and any corrective and preventive action taken.
- **Encourage everyone to report harassment or discrimination as soon as it happens.** Complaints may come directly from the alleged victim, as well as from co-workers, contractors, or customers who report witnessing inappropriate behavior.
- **Make clear that retaliation is prohibited.** In a direct, firm statement, inform managers and employees that those who report possible violations will not be subject to retaliation, and that retaliatory conduct of any kind will not be tolerated.
- **Provide a procedure to routinely check in and ensure that harassment and discrimination is being addressed,** i.e. using routine surveys, interview research, mediation or other organizational evaluations.
A Comprehensive Approach to Addressing Harassment:

- Organizational leaders recognize the seriousness and urgency of the problem of sexual harassment and discrimination.
- Identify people and agencies that can help develop effective prevention and response strategies, and compile a library of useful materials.
- Ask all staff and volunteers to assess the organization climate to determine the prevalence and types of harassment that may exist.
- Adopt a clear anti-harassment policy, which is then clearly communicated to all members of the organization, i.e. via required training sessions, staff meetings, organization website, emails or memos, and postings.
- Compliance officers and Investigators are appointed and trained.
  - If the matter is complex or likely to result in litigation, perhaps an attorney would be the best investigator.
  - Know the relationship between the potential investigator, the alleged victim, and the alleged harasser. Bias may invalidate the investigation.
  - Investigators should work in a team of 2, preferably with an HR representative. Most often one male and one female is best.
- Develop procedure for investigation
  - Obtain the who, what, when, and where of the incident.
  - Document the initial accusation and explanation carefully in case someone's story evolves over time.
  - Ask for all possible witnesses, pro or con.
  - Ask for any other evidence, including written or electronic.
  - Explore the history between the accuser and the accused.
  - Create a written report, with recommendations on discipline or simply a conclusion as to whether the conduct occurred.
- Institute specific measures to respond immediately and effectively when harassment occurs to stop the harassment and prevent recurrence. Flexibly apply response mechanisms to both the victim and the perpetrator, taking into account the context of the behavior.
- Develop guidelines and procedures for collaboration with law enforcement officials, make appropriate referrals to outside agencies, and designate liaison personnel.
- Continually monitor the organization’s climate and promptly address problems that could lead to harassment or that indicate that harassment could be occurring
  - Openness to employee comments
  - Solicitation of feedback from managers and employees
  - Exit interviews with employees leaving the organization
- Staff and/or volunteer training programs support the organization’s anti-harassment efforts.