EPSTEIN BECKER GREEN | Employment, Labor & Workforce Management

ACT NOW ADVISORY

New York Employers Must Issue Compliant Anti-Sexual Harassment Policies by October 9, 2018

October 4, 2018

By Susan Gross Sholinsky, Jennifer Gefsky, Nancy Gunzenhauser Popper, and Alexandra Bruno Carlo

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Effective next Tuesday, October 9, 2018, New York employers must adopt and issue to current employees an anti-sexual harassment policy that complies with the requirements set forth in Section 201-g of the New York State Labor Law ("Law"). Employers also must provide the policy to all new employees hired after that date.

As we previously reported, on October 1, 2018, New York State released its final sexual harassment guidance and resources, including a model sexual harassment policy. Along with this model policy, the State issued Frequently Asked Questions ("FAQs"), which provide additional information about the anti-sexual harassment policy required by the Law.

New York employers may either adopt the State's model policy or establish a sexual harassment prevention policy that meets or exceeds the minimum standards provided by the State's model policy.

According to the Law, the policy must:

(i) prohibit sexual harassment consistent with guidance issued by the New York State Department of Labor in consultation with the Division of Human Rights and provide examples of prohibited conduct that would constitute unlawful sexual harassment;

(ii) include, but not be limited to, information concerning the federal and state statutory provisions regarding sexual harassment and remedies available to victims of sexual harassment and a statement that there may be applicable local laws;

(iii) include a standard complaint form;

(iv) include a procedure for the timely and confidential investigation of complaints and ensure due process for all parties;

(v) inform employees of their rights of redress and all available forums for adjudicating sexual harassment complaints administratively and judicially;

(vi) clearly state that sexual harassment is considered a form of employee misconduct and that sanctions will be enforced against individuals engaging in sexual harassment and against supervisory and managerial personnel who knowingly allow such behavior to continue; and

(vii) clearly state that retaliation against individuals who complain of sexual harassment or who testify or assist in any proceeding involving sexual harassment is unlawful.

The State's Combating Sexual Harassment in the Workplace website provides an optional sexual harassment poster, which provides information about where the policy can be found.[1] The State also issued a toolkit, which explains how employers can comply with the policy and training requirements.

The FAQs pertaining to the anti-sexual harassment policy:

(i) explain that a sexual harassment policy can be provided to employees in writing or electronically, and that if the policy is made available on a work computer, employees must be able to print a copy for their own records;

(ii) state that if an employer already has established investigative procedures which are similar, but not identical, to those provided in the model policy, the employer may deviate from these specific requirements and remain compliant with the Law, but in any event the investigative procedures should be outlined in the policy;

(iii) suggest that the sexual harassment policy should be provided to new hires "prior to commencing work," which means that employers should take care to distribute the policy to new hires during or prior to onboarding;

(iv) encourage (but do not require) employers to supply a policy and training to anyone providing services in the workplace, including independent contractors, vendors, or consultants;

(v) note that the complaint form need not be included directly in the policy, but employers should be clear about where the form may be found, for example, on a company's internal website; and

(vi) strongly encourage employers to provide a policy in the language spoken by an employee.

[1] While the FAQs suggest in several places that the policy should be "posted," this appears to be a recommendation, and not a requirement. An employer may, therefore, wish to make a link to the policy available on any company intranet site or post this poster, which directs employees (and others performing work at the employer's workplace) to where the policy may be found. Additionally, an employer may wish to provide the policy to non-employees providing services in the workplace.

What New York Employers Should Do Now

- Review and revise, as necessary, policies regarding sexual harassment in the workplace to conform to the requirements of the Law pertaining to sexual harassment policies, and include a complaint form.
- Translate policies, and provide training in an employee's primary language(s).
- Provide the revised policy and complaint form to all employees by October 9, 2018.
- Provide the revised policy to new employees prior to commencing work.

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ACT NOW ADVISORY

The Wait Is Over: New York State Releases Final Sexual Harassment Guidance and Training Resources

October 3, 2018

By Susan Gross Sholinsky, Jennifer Gefsky, Nancy Gunzenhauser Popper, and Alexandra Bruno Carlo

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On October 1, 2018, New York State released its final sexual harassment guidance and resources, including (i) a model sexual harassment policy, (ii) model training materials, (iii) a model complaint form, and (iv) Frequently Asked Questions ("FAQs") (collectively, "Guidance"). The Guidance, which is now available on the state's "Combating Sexual Harassment in the Workplace" website, contains key differences from the draft guidance issued in August.[1] One of the most significant revisions is the extension of the deadline for training New York-based employees, from January 1, 2019, to October 9, 2019, providing employers an additional nine months to comply. Even though the training deadline has been extended, New York employers should begin to develop a plan to implement a training program as soon as practicable given that employees will be subject to the new harassment policy requirements on October 9, 2018.

As a reminder, the 2018-2019 New York State Budget, signed into law in April 2018, contained several laws pertaining to sexual harassment, including a requirement that New York employers maintain and distribute an anti-sexual harassment policy and provide interactive sexual harassment training on an annual basis to all employees. The budget also included laws prohibiting mandatory final and binding arbitration of sexual harassment claims and barring non-disclosure agreements ("NDAs") pertaining to sexual harassment claims unless such confidentiality is the preference of the complaining party. Details on these items, as clarified in the Guidance, follow.

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[1] For additional information on the draft materials, please see Epstein Becker Green's *Act Now* Advisory entitled "New York State Provides Draft Anti-Sexual Harassment Materials for Employers."

Training

In addition to extending the training deadline from January 1, 2019, to October 9, 2019, the FAQs:

- eliminate the requirement that new hires be trained within 30 days of hire, and instead instruct that they receive training "as soon as possible";

- explain that, while employees must be trained annually, after the first training, the date of subsequent training may be based on the calendar year, the anniversary of each employee's start date, or any other date the employer chooses;

- reiterate that the training must be conducted in the language spoken by the employee; however, employers may conduct the training in English if the State does not have model training in an employee's primary language (although employers are encouraged to provide the training in the employee's primary language, if possible);

- clarify that if an employer has already provided anti-sexual harassment training to employees this year that:

    - met or exceeded the requirements under applicable law, the employer is not required to provide additional training to employees until the next training cycle, or

    - did not meet all the new requirements, the employer need only provide supplemental training addressing the new and previously uncovered topics, instead of providing completely new training;

- expressly state that there is no required minimum number of training hours per year; rather, employees must simply receive training that meets or exceeds the minimum standards;

- eliminate the requirement that employees who work as few as one day during the year in New York be provided anti-sexual harassment training, and instead state that employees who work a "portion of their time" in New York must be trained; and

- clarify that, for purposes of training, the term "employee" includes all workers, regardless of immigration status, as well as exempt or non-exempt employees, part-time workers, seasonal workers, and temporary workers, and that minors must receive training as well (although such training may be modified to be appropriate for individuals of the employee's age).

The FAQs clarify that training may be delivered online, so long as it is interactive. Examples of "interactive" online training include having questions at the end of a section that require the employee to select the right answer, and having an option to submit a

question online and receive an answer immediately or in a timely manner. An example of an interactive in-person or live training is having the presenter ask the employees questions or giving them time throughout the presentation to ask questions. The FAQs make clear that an individual watching a training video or reading a document, with no additional feedback mechanism or interaction, would not be considered interactive.[2]
The FAQs state that employers are encouraged to keep a copy of training records. Finally, the FAQs specify that employees must be paid for time spent training, including any time spent training during the onboarding process before the employee's actual assignments begins.

Sexual Harassment Policy

The revised model sexual harassment policy includes some notable changes from the draft model policy. First, the 30-day period for completion of investigations has been removed. Instead, the model policy now states that investigations must be commenced "immediately" and should be completed "as soon as possible." Second, in accordance with the Equal Employment Opportunity Commission's guidance and recommendation, the reference to "zero tolerance" for sexual harassment has been eliminated. (The agency had found that "zero tolerance" policies lead to individuals being hesitant to complain about harassment, for fear of getting the alleged wrongdoer fired under any circumstance.)

The FAQs explain that a sexual harassment policy can be provided to employees in writing or electronically, and that if the policy is made available on a work computer, employees must be able to print a copy for their own records. Also, the FAQs suggest that the sexual harassment policy should be provided to new hires "prior to commencing work," which means that employers should take care to distribute the policy to new hires during or prior to onboarding. Finally, although not required, the FAQs encourage employers to supply a policy and training to anyone providing services in the workplace, including independent contractors, vendors, or consultants.

Complaint Form

Although a complaint form is not required to be included as part of a policy, all New York State sexual harassment policies must clearly state where an employee may find a complaint form. The most significant change to the model complaint form is the elimination of the questions about whether an employee has filed a claim with a federal, state, or local government agency or instituted a legal suit or court action regarding this complaint.

[2] Employers may choose to use a third-party vendor or organization to provide training so long as the training meets or exceeds the minimum standards required under the law.

Non-Disclosure of Harassment Complaints

As we noted in our prior *Act Now* Advisory, effective July 11, 2018, nondisclosure clauses in settlements, agreements, or other resolutions of sexual harassment claims are prohibited, unless inclusion of the clause is the complainant's preference.

As such, the Guidance confirms that, prior to including an NDA in a settlement agreement, the complainant must be provided with the nondisclosure term or condition provision in writing, and he or she will have 21 days to consider it. Then, the complainant will have seven days to revoke his or her decision. Only then can the agreed-upon provision be included in the larger settlement agreement.
The revised FAQs clarify that this 21-day period cannot be waived, shortened, or calculated to overlap with the seven-day revocation period. The FAQs further specify that unlike the federal provisions for waiving age discrimination claims (which also include a 21-day review period and seven-day revocation period), the NDA provision requires a separate agreement to be executed after the expiration of the 21-day consideration period and the seven-day revocation period before the employer is authorized to include confidentiality language in a proposed resolution.

Mandatory Arbitration

There were no notable changes to the mandatory arbitration FAQs.

What New York Employers Should Do Now

- Review the Guidance, including your model harassment policy and training program.
- Review and revise, as necessary, policies regarding sexual harassment in the workplace to conform to the requirements of the new law pertaining to sexual harassment policies, and include a complaint form.
- Make sure that compliant sexual harassment training of all New York employees and managers is completed no later than October 9, 2019.
- If training has already been provided that does not meet all the minimum requirements, provide supplemental training no later than October 9, 2019.
- Prepare to provide such training on an annual basis.
- Ensure that compliant sexual harassment training of all new employees is completed "as soon as possible."
- Determine the language(s) in which training should be conducted.
- Translate policies, and provide training in an employee's primary language(s).

- Review any arbitration agreements or programs requiring the arbitration of sexual harassment claims to determine if any revisions are required on a going-forward basis.

- Prepare agreements seeking confirmation that the confidentiality of facts and circumstances underlying harassment claims are, indeed, the preference of the complaining person. Such agreements must be reviewed for 21 days, and once the complaining person's preference has been memorialized, the individual will have seven days to revoke his or her preference before such agreements can be included in a broader settlement document.
- Train human resources professionals and internal legal counsel regarding all essential components of the new laws mentioned above.

- Train human resources professionals and managers on the New York State requirements regarding the applicability of the sexual harassment policy and protections to non-employees.

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REAL SIMPLE

How to Navigate 6 Tricky Work Situations

Should you call human resources or handle the issue yourself? Experts weigh in.

By **KATHLEEN M. HARRIS** August 21, 2018

When a group of people with different egos, ambitions, and personal problems are working in close proximity, there's bound to be conflict. And in this era of #MeToo and revelations about toxic work environments, employees are looking for answers. But who do you ask? Does your boss have your back? What about human resources? Here, experts and insiders share what to do and who to trust when the thorniest work situations happen to you.

1 You have medical or personal issues that might affect your work.

If you need short-term help, like a few extra days off or a brief reduction in workload, talk with your manager. Explain that you're having a tough time and need a short personal leave, says Bucky Keady, a former corporate senior vice president of talent acquisition and management. If you have a potentially serious medical condition or disability, go to HR, where the staff is more familiar with employment law. "HR personnel are legally required to keep medical and disability info confidential and are better trained to handle these types of issues than a manager," says attorney Melissa Fleischer, president and founder of HR Learning Center in Rye, New York. "If an employee needs an accommodation, such as a shorter workday or intermittent leave, HR may relay certain info to a manager but won't disclose why the employee needs an accommodation."

2 You don’t get along with your boss or a coworker.

It’s best to go straight to the source and try to work it out, says Sarah Sheehan, cofounder of Bravely, an online platform that offers HR coaching. Ask the person to meet, then initiate an honest conversation in which you share your feelings, not accusations (“I feel frustrated because whenever I bring up an idea, you say it won’t work”). “It’s hard and awkward, but you’ll make progress,” says Jenni Maier, editor in chief of the online career platform The Muse. If nothing changes or the situation gets worse, go to HR (if the person is your boss) or your boss (if the person is a coworker). “Taking this step first will make you look much better,” says Maier.

3 You’re contemplating quitting or retiring.

Unhappy at work and thinking of quitting? Ideally you have a transparent relationship with your boss and can openly discuss your career path, frustrations, and desire for new challenges, says Keady. However, keep your specific career plans quiet until you’ve made a firm decision. “HR is not your friend,” says Kevin Mintzer, a New York City–based employment attorney. “If you give notice of your intent to quit or retire before you’re actually ready to do it, the company may decide your time is up now and replace you, which in most cases is perfectly legal.” If you need help determining whether to leave and understanding the impact on your benefits, talk to an independent source, like a career coach or employment lawyer (find one through the National Employment Lawyers Association).

4 You’re being sexually harassed.

If you’re dealing with unwelcome sexual advances or other verbal or physical harassment of a sexual or discriminatory nature, document what has happened for your records and immediately tell your boss, another supervisor, the legal

department, or HR—whoever you're most comfortable discussing the situation with. Depending on state laws, managers and supervisors may be personally liable if they've been made aware of harassment and do not report it, says Jennifer Gefsky, a partner in the Employment, Labor & Workforce Management practice at Epstein Becker Green, a national law firm. Often a fear of retaliation prevents people from reporting sexual harassment, but retaliation is unlawful too. "You have a right as an employee to be in a harassment-free environment," says Gefsky. "The Supreme Court tells us that."

5 There's a conflict between two people on your team.

As a manager, you are responsible for defusing tension when conflicts arise. If the disagreement does not involve harassment, illness, disability, or discrimination, try to mitigate the problem yourself. Otherwise someone in HR can coach you on how to take care of the situation.

6 Two people on your team are dating.

If you catch wind of this, meet with the couple and make sure they're aware of company policy (refresh yourself on it too), says human resources expert Suzanne Lucas, founder of the blog Evil HR Lady. Discuss a plan for how to handle the relationship so it doesn't cross company lines. Lucas advises saying, "I understand you two are dating, but at work you need to remain professional." Email your HR rep to alert her of your conversation so you aren't held responsible if there's a bad breakup. What if one person reports to the other? "This is a much bigger issue, and most companies forbid this kind of relationship to avoid the appearance of favoritism," says Keady. Explain the situation to HR and get assistance with the next steps. Often HR will help you transfer one person to another department or give your team members a time frame for one or both of them to find another position on their own.

7 What to do when there isn't an HR department:

Startups, nonprofits, and small organizations don't always have one. But this doesn't mean you're not legally protected; you may just have to do some legwork. These resources will help.

Search Online

Legal sites like nolo.com and career sites like themuse.com cover workplace topics and employee rights.

Go Through Your HR Benefit Site

Startups often use services like TriNet or Zenefits to manage payroll, benefits, and other policies. Begin with their resources or representatives.

If Necessary, Get a Lawyer

Find good representation through the National Employment Lawyers Association, the American Bar Association, or personal referrals.

Listen to Podcasts for Answers

"Those about workplace issues are great sources," says Keady. Try HR Happy Hour, Safe for Work, and The Employment Law & HR Podcast.

Ask Around

"A company with fewer than 100 employees may not have an HR person, but usually someone on staff, like a CFO or CEO, knows policies," says Gefsky.

EPSTEIN BECKER GREEN

NEWS & PUBLICATIONS

Employment Law This Week®: Our 100th Episode – HR's Critical Role in 2018

Episode 100: Week of January 15, 2018
January 15, 2018

Click above or watch via YouTube, Vimeo, MP4, or WMV.

We invite you to view *Employment Law This Week®* - a weekly rundown of the latest news in the field, brought to you by Epstein Becker Green. We look at the latest trends, important court decisions, and new developments that could impact your work. Join us every Monday for a new **five-minute** episode! Read the firm's press release here and subscribe for updates.

Read our press release about the 100th show.

This week's stories include ...

(1) Happy 100th!

Welcome to the 100th episode of *Employment Law This Week!* For our 100th episode, we decided to do something a little bit different. We hope to start a conversation about the role that human resources (HR) must play in our rapidly changing workplace environment.

With the rise of the #MeToo movement, there is clearly a renewed focus on gender discrimination in the workplace. David Garland, Chair of Epstein Becker Green's Employment, Labor & Workforce Management Steering Committee, argues that in 2018, HR cannot take a back seat to other priorities, and that HR should have a seat at the table with the highest level of management. We asked him why:

"More than ever before, compliance with employment law and labor law is as important as compliance with any other law. What we've seen is these high-profile cases presenting a threat at the highest levels of company leadership. And that poses challenges when it comes to reputation of the company, reputation of the brand, and, even in the most serious of cases, the impact on shareholder value. So we need, at the highest level of the company, to be focused on compliance and addressing the important HR issues, particularly preventative HR measures."

Watch the extended interview here. For more, click here: http://www.ebglaw.com/eltw100-hr

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Jennifer Gefsky

George Carroll Whipple, III

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(2) HR's Role in Defining Employee Culture in 2018

If you ask CEOs the most important commodity for their business, they're likely to say their ability to find and retain talent. In an environment in which technology gives any prospective employee a window into the brand and culture of a company, it's the role of the HR department to not only recruit talent, but ensure that current, and even former, employees are satisfied with the company culture. Jennifer Gefsky is a former Vice President of Major League Baseball and the founder of Après, a digital recruiting platform for high-caliber women who are reentering the workforce. We asked her how the recruiting landscape is changing:

"One of the things that the events of 2017 taught us is that the role of human resources groups is going to continue to evolve and grow in 2018 and beyond. Why? Because when a company experiences an event such as a large sexual harassment . . . a very public sexual harassment case, the company takes a hit not only in terms of its value, but in terms of its culture, and in terms of its ability to hire and retain talent, which is really the name of the game. And so because it's such an important role, we're going to see, I think, a wider net cast for human resources within companies, and really, much more of a seat at the C-suite table. You know, chief talent officers, chief people officers, true leaders that are really driving the company culture and employee satisfaction."

Watch the extended interview here.

(3) Our Community

We'd love to get your thoughts on the role that HR can play in 2018. Email us at thisweek@ebglaw.com or comment on this video.

We're extremely proud of the community that we're building here together—a community of lawyers, executives, and HR professionals who not only watch the show but get involved in it by suggesting stories, commenting on them, and participating in our "Tip of the Week" initiative.

In fact, over our first 100 episodes, 95 employment professionals have been generous enough to share their advice with us. These guests have provided advice on a wide range of topics, from employee training to technology in the workplace, to real-world insights on the issues that are top of mind in our current climate, like sexual harassment and labor relations.

To all of those who have contributed, a sincere thank you. And to all of our viewers, we'd like to extend an invitation to get involved in this conversation. Participate in our "Tip of the Week" segment, weigh in on our discussion about HR's role in 2018, and share the show with a colleague. That's how we strengthen our community. This show reaches its full potential when it becomes a catalyst for us to learn from each other. Thank you for 100 great episodes, and here's to the next 100!

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EPSTEIN BECKER GREEN

NEWS & PUBLICATIONS

Employment Law This Week®: Special Edition – Artificial Intelligence in the Workplace

Episode 122: Week of June 25, 2018
June 25, 2018

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George Carroll Whipple, III

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Employee Benefits and Executive Compensation

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This week's episode focuses on artificial intelligence in the workplace:

"AI," or artificial intelligence, has been a buzzword for as long as any of us can remember. But now AI is entering the workplace at a rapid pace. As the technology gets more sophisticated and useful, employers are facing new challenges. Michelle Capezza, from Epstein Becker Green, has more:

> "With the changes in automation and artificial intelligence being introduced into the workplace, employers really need to strategically plan for the future and determine what the future composition of their workforce will be. If they're looking to fully automate departments, for example, or particular jobs, they may need to consider a serious workplace transition policy, as they need to move certain employees into different roles or actually transition individuals out of the company. They might need to consider severance programs, voluntary retirement programs, job sharing, virtual telecommuting, and flexible work arrangements, and even consider how they might reskill and retool their existing employees to prepare them for the new roles they may have to undertake, working alongside a machine in a cobot type of a relationship."

Another area of concern is the impact of the future workforce on labor union relations. Adam Forman, from Epstein Becker Green, has more:

> "For those who have a union relationship already, employers need to keep in mind that the introduction of new AI technologies are a mandatory subject of bargaining, and, absent language in their contract reserving the right to unilaterally implement, they need to bargain over the implementation with the union. For those employers who do not have a union, they need to be

> mindful that fear and anxiety of employees may lead them to go to a union and try to organize with the belief that it could save their otherwise soon-to-be-outsourced job."

The human workforce can also feel threatened by changes in benefits and compensation. Employers should consider taking proactive steps in this area to ensure a positive work environment, as Michelle Capezza let us know:

> "One of the top concerns for employers definitely will need to be to determine what will be the right balance of benefits and compensation for the future workforce. We are going to see a need for a highly skilled worker, someone who adds value as a human when there are certain jobs being performed by machines for some of the more routine tasks."

Adam Forman has more:

> "As with most HR best practices, there's no one-size-fits-all strategy for employers who are looking to implement AI in the workplace. There are, however, several universal factors that most employers should consider. The first is the team that's going to be implementing it. It's important to have a multidisciplinary team made up of HR, legal, and the business and operational units. Next, it's important to do your due diligence. Analyze the vendor contracts and the algorithms to ensure that they're compliant with labor employment law. And after you've implemented, it's important that you aggressively monitor the technologies to assure that they are not having an unintended consequence or perhaps exposing your organization to liability or things such as disparate impact or some other type of unlawful discrimination."

Watch the extended interview with Michelle Capezza here.

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