



Assessment of Christianity Today Relative to Sexual Harassment and Abuse

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I. INTRODUCTION

Christianity Today (“CT”) engaged Guidepost Solutions (“Guidepost”) to undertake a thorough assessment of CT’s culture and workplace environment in connection with the reporting and handling of allegations of sexual harassment and abuse, and to develop forward-looking recommendations on how that culture and environment could be improved. CT initiated this review after two current female CT employees¹ notified CT’s President/CEO/Editor-in-Chief (“CEO”) and its Executive Editor in September 2021 that they believed the company had failed to properly respond to previous allegations that a former senior executive (“Former Employee 1”) had repeatedly engaged in inappropriate conduct toward them and other female employees (including sexualized and sexist² comments and non-consensual physical contact, such as unwanted hugging and touching). These female employees felt that CT had not held Former Employee 1 accountable for his actions and that the organization’s policies and procedures were insufficient to address and prevent future incidents of harassment and abuse.

Although Former Employee 1 no longer works at CT, the organization’s leaders believed that it was important for CT to take a critical look at how it responded to the female employees’ complaints in the past and to determine if the organization had the right policies, processes, and procedures in place now to better handle this type of complaint in the future. In addition, CT’s leaders sought a comprehensive cultural assessment, to determine if there were any aspects of the overall CT culture that could be enhanced to improve the working environment for all CT employees. Guidepost was engaged for these dual purposes. From the beginning, CT leadership expressed a commitment to transparency; accordingly, the organization communicated to both current and former employees its pledge to share Guidepost’s findings on CT’s response to complaints and other issues relating to sexual harassment and abuse in the CT workplace.

As part of our review, Guidepost examined previously reported complaints against Former Employee 1 and others at CT, with the intent of gathering lessons from the past to inform the future. While our examination suggested that the complainants were credible, we did not find a wider pattern or culture of systemic harassment engrained at CT; the credible complaints were confined to Former Employee 1 and another former CT employee. However, we did find that the organization’s processes for reporting, investigating, and

¹ To encourage current and former employees to come forward with information and to be candid during interviews, CT and Guidepost agreed that Guidepost would not use any names in any public report. In an internal statement, CT’s CEO advised current CT employees that any information they chose to share with Guidepost would be kept confidential at the employee’s request.

² We use “sexist” as the adjective form of “sexism,” meaning “behavior, conditions, or attitudes that foster stereotypes of social roles based on sex.” (Merriam-Webster) We use “sexualized” as the adjective form of “sexualize,” meaning to “endow with a sexual character or cast.” (*Id.*)

resolving harassment allegations and similar complaints were not clearly defined and communicated to employees, which created confusion and a perception among those employees of a lack of transparency – and that these problems persist at CT today. Moreover, through an anonymous survey of CT employees, as well as our interviews of the women who filed complaints alleging harassment or inappropriate behavior at CT, we found that CT’s work environment and culture can feel inhospitable to women at times. While many believe that this aspect of CT’s culture has improved under its current leadership, others believe that women are still discounted and treated as “less than” in the CT workplace. In this report, we suggest how CT can address these issues through better processes, training, communications, and leadership initiative, as discussed in more detail below.

Throughout this engagement, Guidepost communicated regularly with CT’s CEO and its Vice President of Technology and Operations, both of whom consistently supported our work. They encouraged us to conduct an in-depth, critical examination of CT’s prior handling of harassment complaints, its current policies and procedures on harassment and abuse, and its overall culture. These leaders proactively sought to identify and address any weaknesses that might hinder CT’s ability to protect its employees against harassment and abuse in the CT workplace. Although our review did not find any pervasive harassment or abuse problems at CT, we did identify several opportunities to enhance CT’s culture and create a better, more respectful work environment for all employees, and CT’s leaders welcomed our recommendations.

II. SCOPE AND METHODOLOGY

Pursuant to the engagement letter between CT and Guidepost, Guidepost was hired to act as an authorized agent of CT in assessing CT’s response to the previous allegations of inappropriate behavior. CT also asked Guidepost to examine the sufficiency of the organization’s current policies and procedures relating to sexual harassment and/or abuse and to recommend changes or improvements to those policies and procedures. In addition, CT requested that Guidepost undertake a thorough assessment of the organization’s culture and provide recommendations to improve in this area as well. To encourage CT employees to report allegations of inappropriate behavior, sexual harassment, or abuse, CT asked Guidepost to establish a 24/7 confidential reporting mechanism. Finally, CT asked Guidepost to provide a written report describing our work, our factual findings and observations, and our recommendations.

To fulfill the objectives of this engagement, Guidepost interviewed current and former CT leaders and employees. In total, Guidepost interviewed fourteen current employees (representing 24% of CT’s workforce of 67 employees, including nine women) and fourteen former employees (including nine women), with some individuals sitting for multiple interviews. These interviewees work or worked at different levels of the CT organizational hierarchy, at different periods of time and for different lengths of time, in various departments.

In addition, Guidepost received ten contacts through the email tip line that was established on October 8, 2021.³ Most of these tip line reports were submitted by former CT employees, some of whom provided detailed information. We followed up on all of these tips, interviewing nine of the individuals who contacted us. And as noted above, throughout this engagement, Guidepost spoke frequently to CT's current leaders, and we drew information from these discussions as well.

Guidepost also reviewed numerous documents provided to us by CT, including (but not limited to) reports, internal notes, emails and other correspondence; CT's Employee Handbook; CT's written policies and procedures relating to harassment, abuse, and inappropriate conduct; training materials; and leadership communications. This document review provided key historical information with respect to our examination of the allegations against Former Employee 1 and others, as well as CT's response to those allegations; the documents also informed and guided our interviews with current and former CT employees.

Finally, as set forth in more detail in Section IV and in an appendix to this report, Guidepost conducted an anonymous survey of CT employees to gather their impressions of CT's workplace culture, with a specific emphasis on sexual harassment and abuse prevention.

III. EXECUTIVE SUMMARY

As noted above, after two current female CT employees came forward with their concerns that CT had not appropriately addressed previous allegations of harassment by Former Employee 1, CT's leaders proactively sought to understand the internal processes and organizational responses that prompted these unresolved concerns and engaged Guidepost to assist with this task.

Our primary focus was reviewing CT's response to the allegations that prompted our engagement. At the same time, we were charged with assessing the organization's current policies and procedures regarding sexual harassment and/or abuse and recommending changes to these processes if necessary. Finally, we were asked to evaluate CT's culture to identify any opportunities for changes that would enhance the organization's ability to prevent any future instances of sexual harassment or abuse and to address any such instances that might arise.

With respect to our primary mission of reviewing the response of CT to the harassment allegations against Former Employee 1 that were reported to the CEO and Executive Editor in September 2021, we found the

³ Working with CT, Guidepost established an email address that allowed current and former CT employees to provide information directly to Guidepost. CT personnel did not have any access to this email account.

women who made these claims to be credible. In addition, we learned of other allegations against Former Employee 1 made by different female former employees at CT, which we also found to be credible. Furthermore, in addition to the allegations that were lodged against Former Employee 1, we also identified other allegations of potential sexual harassment or abuse made by other women against another former employee (“Former Employee 2”). Beyond these two individuals, in the course of our survey and interviews, we did not learn of any other sexual harassment or abuse allegations against any other CT employees (current or former), and therefore, it appears as if Former Employee 1 and Former Employee 2 were singular actors who are not representative of an overall culture of harassment or abuse at CT. However, many women at CT reported that they feel generally undervalued at CT, uninvolved in the decision-making process at times, and underrepresented at higher leadership levels in the organization.

With respect to our assessment of CT’s handling of sexual harassment and abuse matters, we identified a number of opportunities for improvement in the organization – namely, changes that CT should implement in its HR program and resources, policies and procedures, and training. We also determined that CT would benefit from better communications from its leaders with respect to issues relating to sexual harassment and abuse, including more active engagement from those leaders in discussing such matters. In addition, we identified certain steps that CT can take to address the perception by many female employees that they are undervalued in the workplace, as well as the concerns by CT employees about underrepresentation of women and minorities at CT. While we provide a list of all our recommendations in our report (see Section V, Recommendations), we believe the list below to be the most important priorities for CT to act on now:

1. CT’s HR Program should include and maintain an anonymous method or methods (i.e., telephone or email tip lines) to report allegations of harassment, abuse, bullying, and other similar inappropriate employee behavior and update the Employee Handbook accordingly.
2. CT should clarify HR’s role and responsibilities with respect to investigations of harassment, abuse, bullying, or other inappropriate employee behavior and empower HR in such matters as appropriate (subject to authority of CEO and/or Executive Team).
3. CT HR should draft clear written procedures for the investigation of allegations of harassment, abuse, bullying, and other similar inappropriate employee behavior and update the Employee Handbook accordingly.
4. CT should institute regular, informal meetings jointly facilitated by HR and business leaders for departments within CT (i.e., Editorial, Finance, IT, etc.) where employees can discuss issues and questions relating to harassment, abuse, bullying, and other inappropriate employee conduct.

5. CT’s HR Program should require full background checks on key senior candidates for employment, prior to hiring; at a minimum, these background checks should include criminal records check and vetting of a candidate’s social media accounts.
6. CT should develop an actionable plan for recruiting and retaining women and diverse candidates, with a goal of increasing the representation of women and diverse candidates at all levels of the company and communicate the plan to CT employees and the CT Board. This may include a refresh of a Diversity, Equity and Inclusion (DEI) Committee or other group where CT employees can help strategize and assist in concrete steps to develop a diverse culture under the support of CT leadership.

IV. OVERVIEW OF SURVEY RESULTS

To gather employees’ opinions on how CT handles issues relating to harassment and abuse, we developed a twelve-question survey that was made available to all of CT’s current employees in October 2021. The survey was anonymous, but employees could indicate if they wished to speak to Guidepost and could provide their contact information. CT’s CEO included a link to the survey in an October 27, 2021 letter that was distributed to all CT employees via Slack and email. The letter also explained the overall purposes of the Guidepost engagement.

We achieved a high rate of participation in the survey; 58 of the 67 current CT employees (86%) responded to our survey questions. We drew respondents from different levels of the CT organization, as well as varying tenures at CT, as indicated below:

Total Responses:	58
Senior Management:	11
Mid-Level/Lower Management:	16
Staff:	31
0-5 years:	18
5-15 years:	21
15+ years:	19

In the interest of transparency, the actual survey statement/prompts and responses are included in an appendix to this report, as are the summary results (Appendix A).⁴ The summary results show the percentages

⁴ Questions (#7, 10, 13, 15-18) including comments or any identifying information have been omitted from Appendix A due to confidentiality.

of respondents that correspond with the different levels of agreement for each statement/prompt (i.e., “strongly agree,” “strongly disagree,” etc.). The responses to these questions revealed generally positive views about CT’s culture. For example, 91% of respondents overall believe that CT is committed to a workplace free from harassment and abuse, and 78% of respondents overall believe that CT’s leaders want to learn how employees feel about the organization’s culture and will seriously consider recommendations to improve it.

On the other hand, in terms of the reality of the workplace, 24% of respondents (14 people) indicated that they had experienced some form of harassment or abuse during their employment at CT. Specifically, of those 14 people who indicated they had experienced harassment, five of those individuals described the harassment as “sexual harassment/abuse”; this accounted for approximately 8.6% of the total number of respondents. Four respondents (6.8% of the total respondents) reported that they experienced “gender-based” harassment, while the remaining five respondents (8.6% of the total respondents) characterized the behavior that they had experienced as “other” harassment. Of the 14 people who reported some form of harassment, only 57% (eight people) indicated that they reported the harassment or abuse.⁵

Survey respondents could also enter their own responses to three open-ended questions, which asked for any details that they felt comfortable sharing, changes they would like to see at CT as a result of the survey/Guidepost assessment, and recommendations to improve CT’s handling of harassment and abuse issues and the overall openness of the CT culture. In the responses to these three questions, several themes emerged, many of which also surfaced in our interviews:⁶

- Women at CT feel underrepresented at leadership levels, but they are hopeful that the current CEO will hire more women in leadership positions.
- CT employees believe that there is a lack of communication and discussion by CT leadership on topics of harassment and abuse.
- CT employees find the current training on harassment and abuse to be insufficient, noting that it consists only of the minimum state-mandated training.
- CT should have an anonymous reporting mechanism.
- CT does not have documented and communicated investigative policies and processes.

⁵ We note that in our society, more open and informed discussions around harassment of all kinds have increased in recent years, which often has led to more reporting and transparency around the topic.

⁶ Seven women who responded to the survey identified themselves and were also interviewed by the Guidepost team.

V. FACTUAL FINDINGS AND OBSERVATIONS

A. Allegations Against Former Employee 1 and Other CT Employees⁷

1. Allegations Against Former Employee 1

In September 2021, two women who currently work at CT (“Female Employee A” and “Female Employee B,” respectively) submitted a written report to the current CEO and the current Executive Editor of CT alleging that they had been verbally and physically harassed by Former Employee 1, who was a senior executive. They alleged that other women at CT had been harassed by the same employee and that CT’s policies and procedures – and its Human Resources (“HR”) department – failed to protect them and others in the CT workplace from harassment in the past and that those failings persist today. They alleged that even though there had been more than one complaint lodged against Former Employee 1, CT simply issued private warnings to him at times about his conduct, without any escalating disciplinary actions; consequently, they alleged, Former Employee 1 continued to engage in inappropriate behavior toward women. The two current CT female employees asked CT’s current leaders to investigate their complaints.

In the written report they provided to CT, Female Employees A and B cited eight alleged instances of inappropriate verbal and physical conduct by Former Employee 1, including unwelcomed hugging and touching as well as sexist comments. Based on our review of internal CT documents and interviews of former and current CT employees, we found the two current CT employees who made the allegations about Former Employee 1 to be credible. Moreover, in the course of our review, we learned of several additional allegations of inappropriate conduct by Former Employee 1 directed at other former and current female CT employees, and we found those reporters to be credible as well.

We wish to make clear that in stating that we find the accounts of Female Employees A and B and others to be credible, we are not reaching any legal conclusions. Guidepost is not a law firm and did not undertake any legal analysis of whether Former Employee 1’s alleged conduct, if proved, would constitute harassment under any applicable local, state, or federal laws or regulations and we are not providing any legal opinion or legal conclusion about that alleged conduct. It is clear however, Former Employee 1’s alleged conduct clearly contravened CT’s commitment to fostering “a work experience that is based on mutual respect, collaboration,

⁷ At the outset of this section, we note that the account that follows is a broad summary of the allegations against former and current CT employees and our related factual findings. To protect the privacy of those involved, Guidepost has not included the details of these allegations and findings here, as some of the information we relied upon in our review was drawn from internal CT files and confidential interviews. We provided the details of those allegations and our related factual findings to CT in a separate written memorandum, dated February 28, 2022.

openness, fairness, safety, and equality,” as stated in the CT Employee Handbook and has no place in any workplace.⁸

2. Allegations Against Other CT Employees

In the course of our examination of the allegations about Former Employee 1’s conduct, we learned of allegations of concerning behavior by another former employee (“Former Employee 2”). More specifically, in 2015 and 2016, respectively, two different female former CT employees alerted CT HR about alleged angry and aggressive behavior and sexual harassment by Former Employee 2. CT investigated these allegations at the time; one matter was closed with written disciplinary action, while the other matter was closed prior to a full investigation due to the reporting employee’s resignation. Through interviews, we heard that although several other female CT employees (current and former) shared similar concerns about Former Employee 2, they apparently did not officially report those concerns to CT.⁹

In addition, during our review, we were apprised of additional concerns relating to an alleged incident involving a current CT employee (“Current Employee 1”) that occurred at some point in 2016. This alleged incident did not involve inappropriate conduct directed at any other CT employee; rather, Current Employee 1 was alleged to have been viewing potentially inappropriate images on his work computer at the CT office. Because the alleged conduct itself is subject to different possible interpretations, we cannot draw any conclusions about this alleged incident based on the facts as presently known. CT has informed us that it currently employs software that monitors specific website activity and prevents pornography from being accessed on CT equipment.

3. Observations

There is no evidence that inappropriate behavior or harassment pervades the CT workplace. As stated above, based on our review of internal CT documents and interviews of current and former CT employees, we found the allegations against Former Employee 1 to be credible and substantiated. Even assuming that the allegations against Former Employee 2 are accurate, there is no evidence to suggest that there is a pervasive environment or culture of sexual harassment, abuse, bullying or inappropriate treatment of women at CT. Former Employee 1 and Former Employee 2 appear to be singular actors who are not representative of an overall culture of harassment or abuse (and who are no longer employed by CT).

⁸ Christianity Today Employee Handbook, § 500 (“Healthy Workplace”) at 49 (2020).

⁹ CT ultimately terminated Former Employee 2’s employment unrelated to these allegations of workplace misconduct.

B. Reporting and Investigation of Harassment and Abuse at CT

1. CT's Response to Allegations Against Former Employee 1

CT's HR department is responsible for investigating alleged violations of CT policy and applicable law; HR was therefore tasked with investigating allegations against Former Employee 1 and Former Employee 2.¹⁰ While CT's HR department conducts the investigation of any reported violations of policy or law, decisions about the ultimate disposition of any investigated matter, including disciplinary decisions, are made by CT's executives. The decisions about discipline for Former Employee 1 were made by the former CEO, before his retirement, and the current CEO who joined CT on May 1, 2019. The former CEO also determined the discipline imposed on Former Employee 2, including the decision to terminate his employment.

In reviewing how CT's leaders and HR personnel responded to the allegations against Former Employee 1, we identified several aspects of the organization's response that were lacking. For a long time, CT did not act as if the alleged conduct by Former Employee 1 was problematic enough to be formally addressed with him or to warrant disciplinary action. Rather than acknowledging that Former Employee 1's comments about women and his touching of female employees were violations of CT's policies (as set forth in its Employee Handbook) and pushing for appropriate discipline, some CT employees (including executives) rationalized his bad behavior in various ways. Some interviewees suggested that Former Employee 1 held outdated views about how to speak and behave toward women in the workplace because he was part of an older generation of men. Others tried to divine Former Employee 1's intent when he made inappropriate comments or touched someone without consent. One individual told us that there was an assumption that Former Employee 1's actions were not sexual or ill-intended; rather, Former Employee 1 was just an older man who liked to hug.

All of these are examples of individuals at CT prioritizing Former Employee 1's personality quirks, age/generation or intent (or lack of it) over women's feelings of discomfort with his conduct. While individuals at CT – including individuals involved in the HR investigation and discipline process – may have believed the behavior of Former Employee 1 should have been addressed, there was little decisive action taken to stop his

¹⁰ At the time those allegations were made, the HR department consisted of the HR Director and an HR generalist ("HR Generalist"). The HR Director retired in 2019, and the HR Generalist became the HR Manager. The HR Manager has recently resigned, and CT is currently seeking to fill this position.

actions. Some at CT sought to explain or understand why Former Employee 1 behaved as he did, rather than address his conduct.

CT's culture and Former Employee 1's place in that culture might have affected how CT employees responded to his alleged conduct. In the view of some female CT employees, there is a "paternalistic" culture at CT in which women's contributions are not appreciated or valued at times. Within that paternalistic culture, Former Employee 1 was a powerful presence by virtue of his senior position at CT, his tenure at CT, and his personality.¹¹ Such a culture could influence employees' reactions to the allegations against Former Employee 1, leading them to minimize his conduct towards women and attempt to explain it away.

CT's institutional failure to view the allegations against Former Employee 1 with sufficient gravity is perhaps reflected in the minimal disciplinary actions that were taken against him for his alleged misconduct. As stated in her written submission to CT, Female Employee A believed that CT executives and HR personnel failed to take her allegations about Former Employee 1's touching seriously. For example, according to Female Employee A, when the HR Generalist followed up with her about one alleged incident of Former Employee 1 touching her in mid-August 2019, the HR Generalist purportedly told her that "the next incident will be taken seriously." This incident of unwanted touching led to the first (and only, seemingly) written warning issued to Former Employee 1; when the current CEO (who had joined CT just months earlier) learned of this episode, he decided to issue a written warning to Former Employee 1, in late August 2019.

Other than this written warning, there is very little documentation about any discipline that Former Employee 1 may have received. Two former executives with oversight of Former Employee 1 both said that they had spoken to him about not touching women in the CT workplace, and other current and former CT employees told us that they believed that Former Employee 1 had been told not to touch any of the women in the CT workplace. If any such verbal warnings were given to Former Employee 1, we are not aware of any formal, written documentation memorializing the date and substance of those reprimands. As a result, whenever another incident of touching by Former Employee 1 occurred, there would be nothing to indicate that he had been put on notice by earlier warnings - until the formal written warning for his conduct toward Female Employee A was issued by the current CEO in August 2019.

Even assuming that the verbal warnings were given, Former Employee 1 seemingly suffered no meaningful consequences from his conduct until close to the end of his tenure at CT. While female CT employees had

¹¹ A memo from February 2019 reported that a CT editorial leader stated that Former Employee 1 believed that the women who objected to his inappropriate comments and conduct were simply too sensitive (implying that the women's sensitivity was the problem, not Former Employee 1's actions).

previously reported their allegations against Former Employee 1, the lack of documented discipline for his behavior limited CT's options in August 2019. If previously issued warnings (assuming there were any) had been documented, CT may have been able to pursue more stringent discipline in 2019. The lack of previously documented disciplinary action against Former Employee 1, in combination with the rationalizing of his conduct by the CT community, may have empowered him to continue his alleged misconduct, even after he left full-time employment at CT.

2. HR Processes for Reporting and Investigating Harassment Allegations

In the course of our interviews, current and former CT employees (including HR personnel) identified aspects of CT's reporting and investigation processes that they believe need to be revised and improved. In addition, in our survey of current CT employees, we gathered additional information about how those employees feel about reporting harassment or abuse to CT and how well CT responds to such complaints.

Broadly speaking, most former and current CT employees said that HR personnel were approachable and took things seriously; CT employees are generally comfortable bringing issues to HR. Employees view the current CEO as responsive to issues relating to harassment, bullying, or abuse. However, looking beyond these general impressions, we have identified several areas in which CT needs to improve its HR processes and procedures.

First and foremost, while CT's written policies on harassment, employee conduct, workplace conflict, and related issues are generally sufficient, the organization's processes for reporting, investigating, and addressing complaints in these areas are not well-defined and sufficiently publicized to the CT workforce. We highlight some of the areas in need of improvement below.

With respect to reporting harassment allegations, the CT Employee Handbook tells employees to whom to report such complaints, but it does not specify how to report, nor did CT provide any method of anonymous reporting until recently.¹² A few employees told us that they were unaware of reporting protocols. The CT reporting policy indicates that an employee should report harassment to his/her manager unless it would be "inappropriate" to do so, but it does not give the employee any guidance on what "inappropriate" means in that context. Some employees (women and men) also told us that they were confused at times about *what* to report – specifically, whether to report conduct that may not constitute obvious, seriously harmful harassment, but still feels "creepy" or uncomfortable to the person on the receiving end. Some employees had a sense that only "major" issues should be reported. When conduct falls into a "gray area," some employees are not sure what to

¹² As noted above, since the beginning of our engagement, CT employees can anonymously report allegations directly to Guidepost via a Guidepost email address; our team independently reviews all allegations reported to us and investigates when necessary.

do and would appreciate examples and guidance on what should be reported. Although CT requires its employees to take a state-mandated online training course about sexual harassment, the majority of individuals who we interviewed believe that this training is insufficient and does not help them successfully navigate situations involving potential harassment at CT.

Another aspect of reporting that seemingly is not sufficiently taken into account at CT is how the power dynamic between employees can influence the decision of whether or not to report harassment allegations. Some may feel intimidated or fear the consequences of reporting alleged misconduct by someone higher up in the organization – even if that more senior employee is not in the employee’s supervisory chain, and even if the employee has the option of reporting to HR. In an interview, one woman expressed a sense of futility about reporting allegations against higher-ups, stating that if someone at CT is important enough, they can get away with things; a female former employee made a similar observation. Another woman stated that Former Employee 1’s words seemed to matter more than a woman’s words in any “she said/he said” situation.

With respect to the investigation of harassment allegations, CT’s processes do not include defined written investigative procedures with specific steps or any requirements about documenting investigative findings. We did not see any written guidance as to who has decision-making authority with respect to opening or closing an investigation, imposing disciplinary action, or notifying CT’s Board of Directors about an investigation, should the need arise. There is also no written guidance for managers as to when they should or must escalate a reported allegation to HR. In addition, CT does not have any procedures governing how an accused employee may internally respond to allegations or appeal any adverse finding.

Significantly, there are no provisions governing confidentiality, including what can be communicated to the reporting party, the accused party, or other employees during or at the conclusion of an investigation. This is an important point when it comes to transparency and managing expectations after an allegation is reported; some employees mentioned that they did not know what action, if any, was taken when they reported allegations to CT. In addition, in the absence of guidelines about what can be disclosed and to whom and when, HR personnel feel uncertain about when they may provide information to reporting parties or others involved.

Investigations into allegations of harassment and abuse must be conducted with respect and sensitivity to the reporting party, yet also with fairness to those accused of misconduct. Individuals who worked in CT’s HR function expressed a desire to receive specific training on investigating and managing harassment allegations. They were not trained in trauma-informed investigation skills, which can be critical in the investigation of harassment and abuse allegations. CT HR personnel also lacked up-to-date training about other best practices related to the reporting and investigation of harassment and abuse matters. CT has an opportunity to address these training weaknesses when hiring a new employee in HR.

With respect to outcomes of harassment investigations, CT does not have written guidelines on disciplinary action that can be imposed if harassment allegations are substantiated. As recounted above, when addressing relative to misconduct, CT relied heavily (according to interviewees) on verbal warnings; these warnings, if given, were never documented in HR records. CT does not have any guidance on the circumstances that would lead to a warning, what type of warning might be warranted (verbal or written), the memorialization of any warnings, or the escalation of disciplinary action if the misconduct persists.

Related to the topics of investigations and discipline, in addition to more defined processes and better training, CT HR personnel would benefit from more respect and visibility from CT's leaders. Former HR employees stated that they did not feel fully empowered when it came to harassment investigations, nor did they believe that they had any real authority. They recognize that major decisions about violations of CT's policies on harassment and other workplace conduct matters will be made by CT's top executives, but those executives should listen and give weight to HR's advice and recommendations in making those decisions, given their expertise in employee matters.

Finally, CT does not undertake any background checks of candidates in its hiring process. We were told that the organization typically ran full background checks on candidates for "key" positions; however, no background checks were done for recent senior hires. When background checks were performed, those checks did not include any social media vetting. For "normal" (i.e., not senior) hires, CT checks two of the candidate's references and reviews the individual's application. CT apparently has not budgeted for this critical due diligence – which could serve to flag candidates who engaged in problematic behavior in the workplace in the past.

C. Work Environment and General CT Culture

Through our interviews of current and former CT employees¹³ and the survey of current employees, we developed an understanding of CT's historic and current culture and work environment. Unsurprisingly, given the variety of employees with whom we spoke and who completed the survey, we gathered a variety of opinions on the positives and negatives of the CT culture. Guidepost did not assess the accuracy of employees' perceptions or opinions. Nonetheless, the comments recounted herein are provided as insight into employee

¹³ A sample of former CT employees were interviewed. The former employees interviewed left CT within the last five years and former executives left within the last seven years.

concerns and perceptions, and several themes emerged from employees' responses to our interview questions and our survey.

Like many other legacy print media companies, CT is transforming into a primarily digital media organization, and this transition has resulted in many changes to the CT workplace in recent years. In addition, in May 2019, the current CEO joined the organization when the former CEO retired after 35 years (including twelve years as CEO). Many employees feel positively about the current culture of CT under its current leadership. Some people noted that employees feel somewhat stressed at times due to their workloads, staff turnover, and resource constraints, while some feel uncertain about personnel and other changes that might come in the future due to past layoffs.

As stated above, the culture of CT does not appear to be dominated by sexual harassment or abuse. However, according to several interviewees, sexism does exist at CT (as it does at many other workplaces, both religious and secular) and is a systemic problem that needs to be addressed.¹⁴ Female CT employees who we interviewed stated that they had been subjected to various unconsciously sexist behaviors by men in the CT workplace, including being patronized, belittled, interrupted, talked over, and micromanaged. Several women told us that they felt they were deliberately omitted from decision-making, with one woman stating that "men go to men all the time and women are told to do what the men decided."

It is possible that CT's flawed institutional response to harassment allegations could have been influenced, in part, by unconscious sexism. As set forth above, individuals at CT at times tried to minimize or rationalize Former Employee 1's behavior by attributing it to his status as an older male who was out of touch with current workplace mores, instead of recognizing that his behavior was inappropriate by any standards, for any person. In addition, we heard that Former Employee 1 thought that the women who complained about his conduct were too sensitive – in other words, in Former Employee 1's view, his conduct wasn't the problem, the women's reaction was. Failing to appreciate the role that sexism plays in the CT culture may have contributed to the failure to correctly identify certain behavior as harassment and to develop an appropriate response.

Among some of the women who provided information to us, there is a perception that women are not on an equal standing with men with respect to pay, for some women at CT told us that women at CT are not paid equally to men, despite their position or job performance.¹⁵ For example, one woman asserted that her salary was intentionally limited when she was promoted because CT would not allow her to earn more than a male

¹⁴ As noted above, by "sexism," we mean "behavior, conditions, or attitudes that foster stereotypes of social roles based on sex." (Merriam-Webster)

¹⁵ In addition to women expressing concerns relative to equal pay, some men expressed concern about their pay equity as well.

employee who had been at the organization longer. In addition, some women told us that there was a perception that employees who are deemed to be “breadwinners,” who are typically male CT employees, received promotions and pay raises that non-“breadwinning” employees did not get.

With respect to pay equity, we understand from our discussions with the CEO and the VP of Technology and Operations that CT has conducted compensation studies and comparisons and has adjusted salaries in accordance with the benchmarking aspects of those studies. For a variety of reasons, CT (like most organizations) does not publicly disclose salaries. Accordingly, the perceptions of pay equity recounted above do not necessarily reflect the reality at CT. Whether accurate or not, even the perception of unequal compensation of women can contribute to a feeling that the CT culture does not value them as much as it values male employees.

Similarly, there is a perception that women do not have equal standing with men within the CT organization. Almost uniformly, the female CT employees who we interviewed (and some of the male employees as well) observed that CT lacks female leaders; indeed, there is only one woman (who is a Vice President) on the Executive Team.¹⁶ Some interviewees asserted that higher-level, managerial positions at CT are held by men, while lower-level staff positions are held by young women.¹⁷ One woman told us that when she was up for a promotion, she was told that she would have to share her new role with a male employee who would have otherwise had to report to her, because that male employee “was not ready for her to supervise him.”

In light of the foregoing opinions about CT’s culture, it is perhaps not surprising that some women at CT believe that they are not valued as highly as men in their workplace. Some women expressed that they feel a lack of respect at CT, despite the fact that almost half of CT’s employees are women. In our interviews, men at CT expressed a more positive view of the organization’s culture than women; men typically did not identify many negative aspects of CT’s culture, while women saw more problems, even when they gave a good overall rating to the culture. For their part, some men at CT noted their confusion about what constitutes harassment or what might make women feel uncomfortable in the workplace. At CT, both male and female employees want better training and more conversations in these areas to help them navigate these issues sensitively. As one employee stated in the survey:

“I’d like more of a speak up culture, but I also want to have a spirit of trust and mutual respect among colleagues. I don’t want everyone to feel like a potential target of their co-workers and

¹⁶ Another woman on CT’s Executive Team (the former Chief Operating Officer) recently retired, in November 2021. CT informed us that in the past, its Executive Team has included other women.

for everyone to walk on egg shells [sic] around each other. I'm not sure how to have one without jeopardizing the other.”

D. Leadership

As part of our cultural assessment, in our interviews and our survey, we specifically asked CT employees for their opinions (including constructive criticism) about how CT’s leaders have addressed the topics of harassment and abuse. In response, CT employees asserted that the organization’s leaders do not sufficiently initiate or promote ongoing conversations about these subjects at CT, nor is there any holistic messaging from leaders that harassment or abuse will not be tolerated in the workplace. Instead, there is a one-time-only, one-way communication about the need to complete annual training – employees simply receive emails with links to training videos, without any substantive messaging from leaders about the importance of creating and maintaining a workplace that is free from harassment, abuse, bullying, or other inappropriate employee conduct.

In the survey, some employees touched on the idea of enhanced leadership communication when suggesting how CT might improve its culture and its handling of allegations of harassment and abuse. For example, these anonymous commenters stated:

- “Management must continue to articulate its commitment to this kind of culture and overcommunicate these values to the staff, as well as the processes for reporting violations or concerns.”
- “Ongoing education and open dialogue with all staff related to: how harassment and abuse in the workplace is defined; the process to be followed by staff involved with such concerns; the manner in which issues are addressed by HR and general management, clarity on the roles and responsibilities of each of these groups, and how these groups are held accountable for their responsiveness; the tension and balance of necessary confidentiality and open, transparent communication; tailored training for supervisors and middle management.”

In addition, during the course of our interviews, many current employees provided their views, more generally, on the overall strengths and weaknesses of CT’s current leaders. For the most part, CT employees have a positive opinion of the current CEO and other CT leaders, with many opining that CT’s work environment has improved under the leadership of the current CEO.

While generally satisfied with CT’s current leadership, as noted above, many CT employees criticized the lack of women at the leadership level at CT, with some individuals also noting the lack of diversity within the larger CT workforce. There is a perception that CT leaders talk about the importance of gender and racial diversity,

but they do not follow through by actually diversifying the leadership ranks or the overall workforce. Some employees mentioned that the initial hires by the CEO were all men who he knew prior to joining CT. In addition, some employees believe that the one woman on the Executive Team is marginalized and not included in decision-making. This lack of women at the top levels of CT may contribute to the perception of some female employees that women are not valued at the organization, as well as an underappreciation of the unique needs of working women (such as maternity leave, lactation accommodations, and childcare) and obstacles in the workplace (such as conscious and unconscious sexism). In our discussions with CT leadership, they agreed that diversifying the organization's leadership ranks is an opportunity for improvement.

VI. RECOMMENDATIONS

As the foregoing discussion makes clear, CT struggles with effective handling of harassment, abuse, bullying, and other inappropriate workplace conduct, as well as aspects of its culture and leadership. Many of these issues can be addressed or mitigated by change or improvements in three broad areas – HR Program and Governance (including Program Structure, Policies and Procedures, and Training), Communications and Transparency, and Leadership Initiatives.

A. HR Program and Governance

As part of our assessment, we reviewed CT's HR program, including the program's structure and governance, policies and procedures, training, and resources. While we heard positive things about the former HR staff, our review identified gaps in HR's program and its governance. As CT seeks to enhance its culture and ensure accountability, we recommend the following enhancement to the HR program and governance:

HR Program Structure and Resources

7. HR Program should include and maintain an anonymous method or methods (i.e., telephone or email tip lines) to report allegations of harassment, abuse, bullying, and other similar inappropriate employee behavior and update the Employee Handbook accordingly.
8. HR Program should require full background checks on key senior candidates for employment, prior to hiring; at a minimum, these background checks should include criminal records check and vetting of a candidate's social media accounts.
9. Clarify HR's role and responsibilities with respect to investigations of harassment, abuse, bullying, or other inappropriate employee behavior and empower HR in such matters as appropriate (subject to authority of CEO and/or Executive Team).

10. Provide sufficient resources to HR to replace the recently resigned HR Generalist and support additional personnel enhancements, if needed.

HR Policies and Procedures

In its Employee Handbook, CT has written policies addressing harassment, abuse, bullying, and other inappropriate employee conduct, as well as expectations for how CT employees should behave in the workplace. However, as detailed above, those policies could be strengthened, most notably with respect to the reporting, investigation, and disposition of allegations of harassment and other misconduct. Accordingly, we recommend the following:

1. Draft clear written procedures for the investigation of allegations of harassment, abuse, bullying, and other similar inappropriate employee behavior and update the Employee Handbook accordingly. These procedures should address:
 - a. Who is responsible for conducting and documenting such investigations;
 - b. The steps that must be taken in the investigative process;
 - c. The expectations about the timing of an investigation, from beginning to end;
 - d. Requirements to document all allegations reported to CT supervisors or HR;
 - e. Requirements to document all investigative steps; and
 - f. Confidentiality, including what information can be shared with individuals involved in the investigation and relevant supervisors, and when such information can or will be shared.
2. Draft clear written procedures governing the potential outcomes of an investigation into allegations of harassment, abuse, bullying, and other similar inappropriate employee behavior and update the Employee Handbook accordingly. These procedures should address:
 - a. The various escalating degrees of disciplinary actions that can be taken against an employee, and what factors go into making a decision about disciplinary action;
 - b. Who is responsible for making decisions about disciplinary action; and
 - c. Requirements to document any disciplinary action of any type.

3. In the Employee Handbook, provide a wide variety of examples of harassment, abuse, bullying, and other inappropriate behavior, including realistic, anonymized examples relevant to CT's Christian workplace.

Training

Many CT employees told us that CT's training on sexual harassment was the minimum required under state law, which they found to be insufficient. CT provides its employees with its Employee Handbook but does not engage them in any meaningful or interactive way on the contents of that handbook. To be most effective in preventing bad behavior and encouraging reporting, CT's training on harassment, abuse, bullying, and other inappropriate employee conduct should be comprehensive, regular, interactive, and tailored to the CT workplace and workforce. In addition, as discussed in more detail in the following sections, this training should be supported by a thoughtful communications strategy that includes leadership messaging emphasizing the importance of this training. Accordingly, we recommend the following:

Onboarding Training:

1. As part of the onboarding process for new employees, provide interactive training on the CT Employee Handbook; upon completion of this training, require new hires to execute a signed acknowledgment attesting that they have completed the training, reviewed the CT Employee Handbook and understand its contents, and agree to abide by the policies therein.

Harassment, Abuse and Other Conduct-Related Training:

1. Provide employees annual mandatory and other training to the CT workforce about harassment, abuse, bullying, and other inappropriate employee conduct that is tailored to a Christian media organization. This training must comply with applicable laws and should include:
 - a. A review of the CT Employee Handbook and the policies and procedures therein relating to harassment, abuse, bullying, and other inappropriate employee conduct;
 - b. How to report harassment, abuse, bullying, and other inappropriate employee conduct at CT (i.e., the different reporting methods available to employees);
 - c. What type of conduct should be reported, including (but not limited to) specific examples of illegal conduct, unacceptable conduct, subtle conduct ("gray areas" or "edge cases") that may not be as apparent to employees;

- d. When appropriate, training should be provided in-person. This training could include small-group workshops as well as larger group sessions. Training could be considered for different groups at CT including HR professionals and managers.

For example:

- Training for HR professionals on trauma-informed interviewing and other best practices in conducting investigations into sensitive allegations, as well as legal aspects of such investigations (i.e., confidentiality, reporting to law enforcement, etc.);
 - Training for managers that includes discussion of how the power differential between employees at higher levels of the organization and the employees who report to them may affect an employee's willingness to report allegations of harassment, abuse, bullying, and other inappropriate employee conduct; and managerial responsibility to report any instances of inappropriate behavior.
2. Track employee completion of required training sessions and follow up with employees who fail to timely complete required training; if necessary, impose disciplinary action on employees who do not complete training within reasonable timeframe.
 3. Institute regular, informal meetings jointly facilitated by HR and business leaders for departments within CT (i.e., Editorial, Finance, IT, etc.) where employees can discuss issues and questions relating to harassment, abuse, bullying, and other inappropriate employee conduct.

Ongoing Training on the CT Employee Handbook:

1. Update the CT Employee Handbook to specify the training expectations for employees and the potential consequences for failing to complete required training.
2. Require all employees to annually review the CT Employee Handbook and to execute a signed acknowledgement attesting that they have reviewed the Employee Handbook, understand its contents, and agree to abide by the policies therein.

B. Communications and Transparency

To embed the ethos into CT's culture that harassment, abuse, bullying, and other inappropriate employee behavior will not be tolerated in the CT workplace, CT should engage in an ongoing conversation about these issues that is authentic and genuine to the culture of the organization. This conversation can be initiated and sustained by a communications strategy that supports the above-described policies and procedures and

training, with CT's CEO and other executives taking the lead on delivering messages to the CT community. Accordingly, we recommend the following:

1. Develop a communications calendar to set a cadence for regular, consistent messaging in different channels (email, Slack, virtual meetings, in-person meetings, internal signage, etc.) from CT executives about various facets of harassment, abuse, bullying, and other inappropriate employee conduct.
2. Publicize (in more than one place or more than one method) how employees can report allegations of harassment, abuse, bullying, or other inappropriate conduct including through the anonymous tip line or reporting method discussed above.
3. Create and disseminate communications from CT executives and managers that:
 - a. authentically communicate the broad message that harassment, abuse, bullying, and other inappropriate employee conduct will not be tolerated by anyone in the CT community;
 - b. focus specifically on various aspects of harassment, abuse, bullying, and other inappropriate employee conduct, one aspect at a time (for example, separate emails from the CEO to the CT workforce that provide a specific example of harassment in the workplace, focus on unconscious bias/sexism, or describe the ways that CT employees can report allegations);
 - c. specifically highlight the different training materials that CT offers, including which would include not only training links but messaging that expands on the content of the training videos and emphasizes the importance of the training; these communications could be sent by CT executives and by department leaders/managers to their department employees.
4. Create and disseminate communications that clearly explain the investigation process (as set forth in the CT Employee Handbook) and what employees can expect with respect to investigation steps, timing, potential outcomes, and the disclosure of information about ongoing investigations.
5. Create and disseminate communications from CT executives and HR personnel encouraging employees to report allegations of harassment, abuse, bullying, or other inappropriate conduct. These communications should endeavor to eliminate any stigma that might exist about reporting and emphasize reasons why reporting is beneficial (e.g., it's the right thing to do, it's good for the organization, it's healthy to get these issues out in the open, etc.).
6. To increase transparency about efforts to diversify the CT workforce and to evaluate pay equity among employees, create and disseminate communications that inform CT employees what CT has

done to address these issues at CT and what the company intends to do in the future. Provide concrete details, when possible, to assure employees that CT is taking action and not just paying lip service to these ideals.

C. Leadership Initiatives Related to Harassment and Abuse Issues

For the most part, CT employees have positive feelings about the direction of the company and the vision of its leaders. However, they believe that CT's leaders need to initiate and sustain company-wide discussions about issues relating to harassment, abuse, and other inappropriate workplace behavior. In addition, CT's leaders can demonstrate that the organization values the women in the CT community by increasing the representation of women at the leadership level and empowering women at all levels. Accordingly, we recommend the following:

1. Pursuant to the communications strategy and calendar recommended above, CT leaders should lead the conversation on harassment, abuse, bullying, inappropriate employee conduct, and other related issues.
2. Develop an actionable plan for recruiting and retaining women and diverse candidates, with a goal of increasing the representation of women and diverse candidates at all levels of the company and communicate the plan to CT employees and the CT Board. This may include a refresh of a Diversity, Equity and Inclusion (DEI) Committee or other group where CT employees can help strategize and assist in concrete steps to develop a diverse culture under the support of CT leadership.

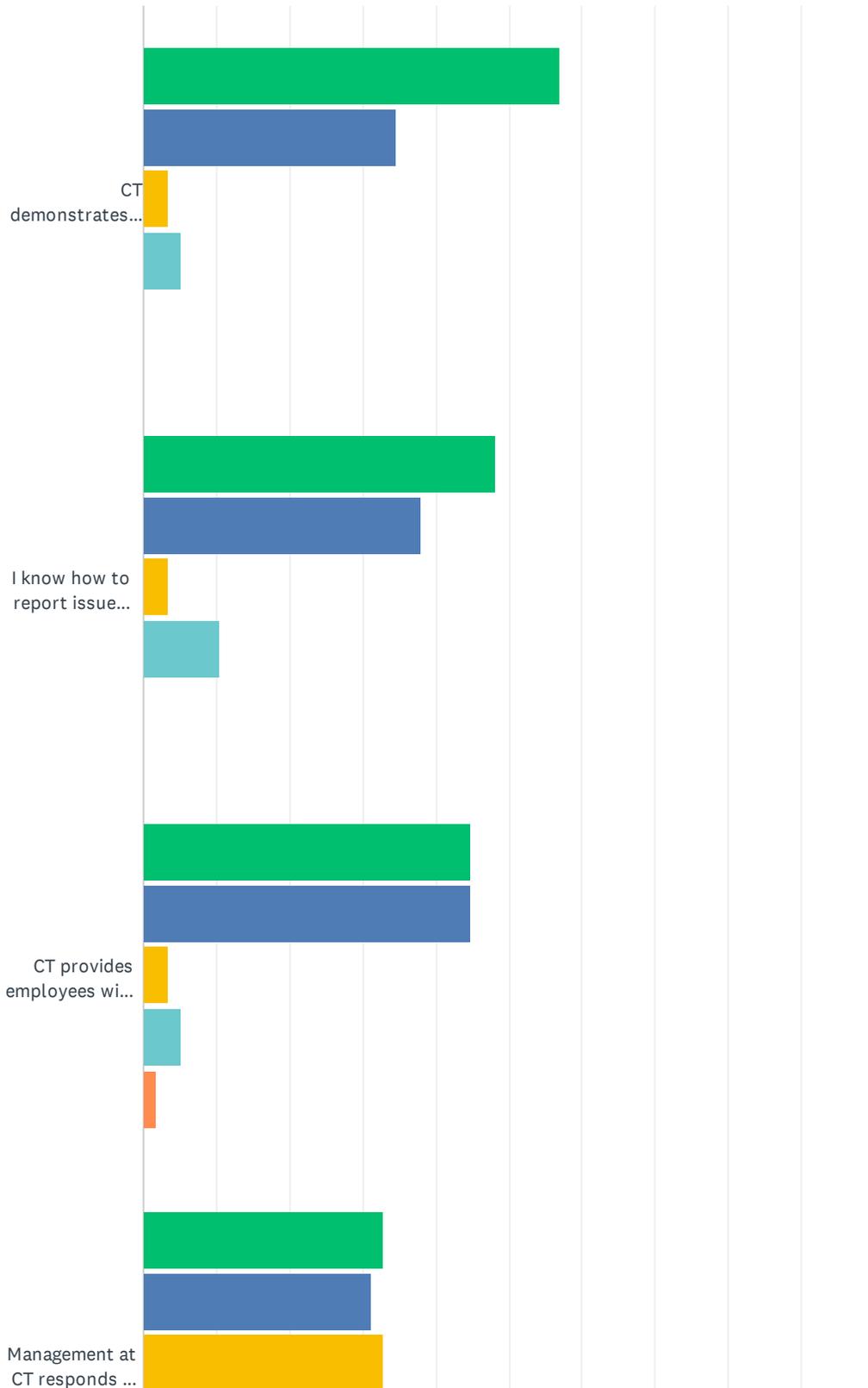
VII. CONCLUSION

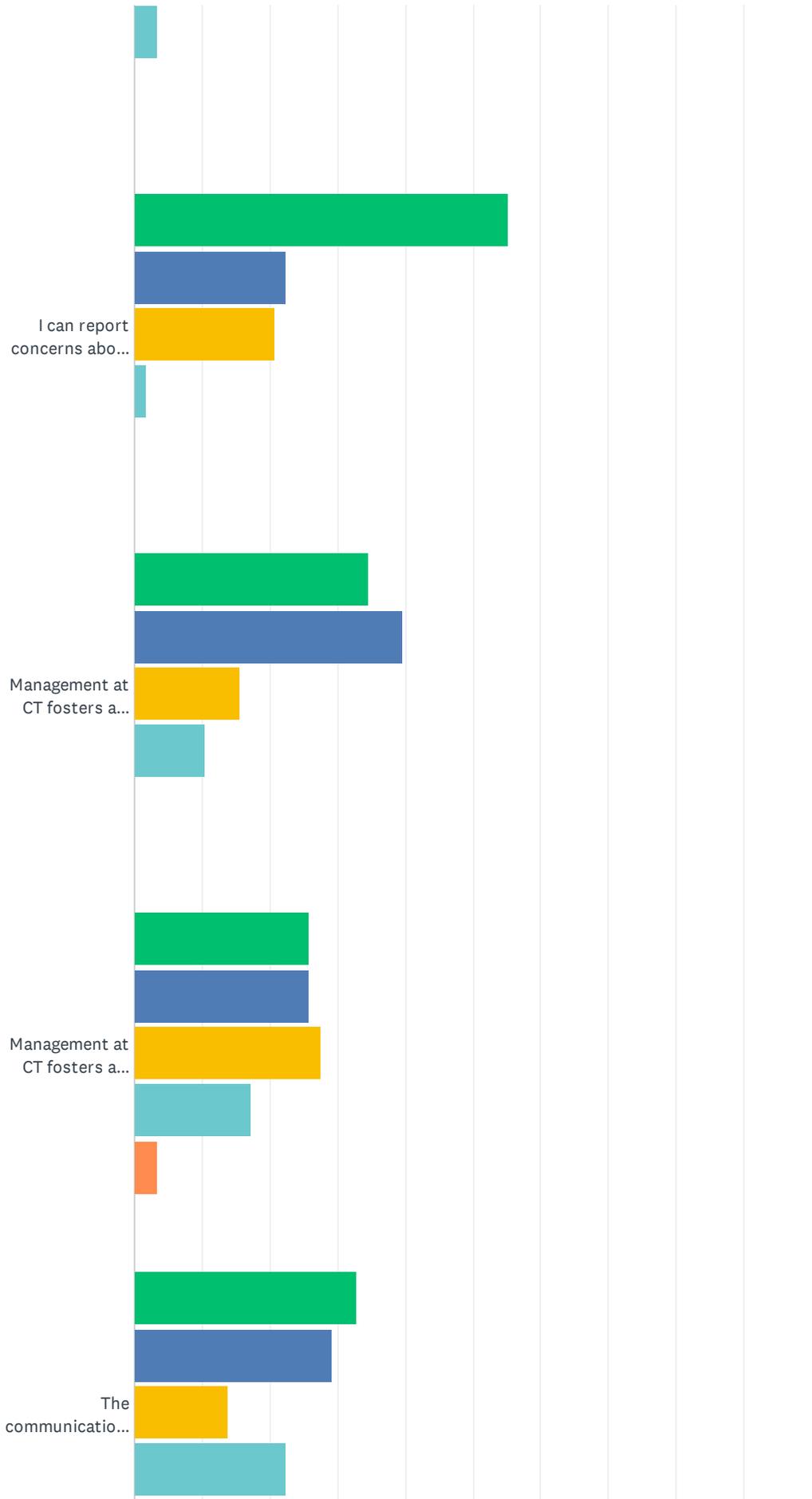
Many CT employees we interviewed communicated that they feel valued and appreciated by their leaders and their colleagues. However, as the foregoing discussion demonstrates, some female members of the CT staff feel undervalued and unsupported at times. CT can undertake changes that can positively and significantly impact the organization's culture as it relates to harassment and abuse matters; those recommended changes include clearer policies and reporting procedures; consistent training; regular communication and discussion about harassment and abuse; and continued demonstrated leadership commitment. In making this report available to the public – a step which we commend – and openly demonstrating its willingness to elicit candid and specific feedback from both current and former employees on the important topics of harassment, abuse, and equality in the workplace, CT will also serve as a role model to both other faith communities and secular workplaces as well.

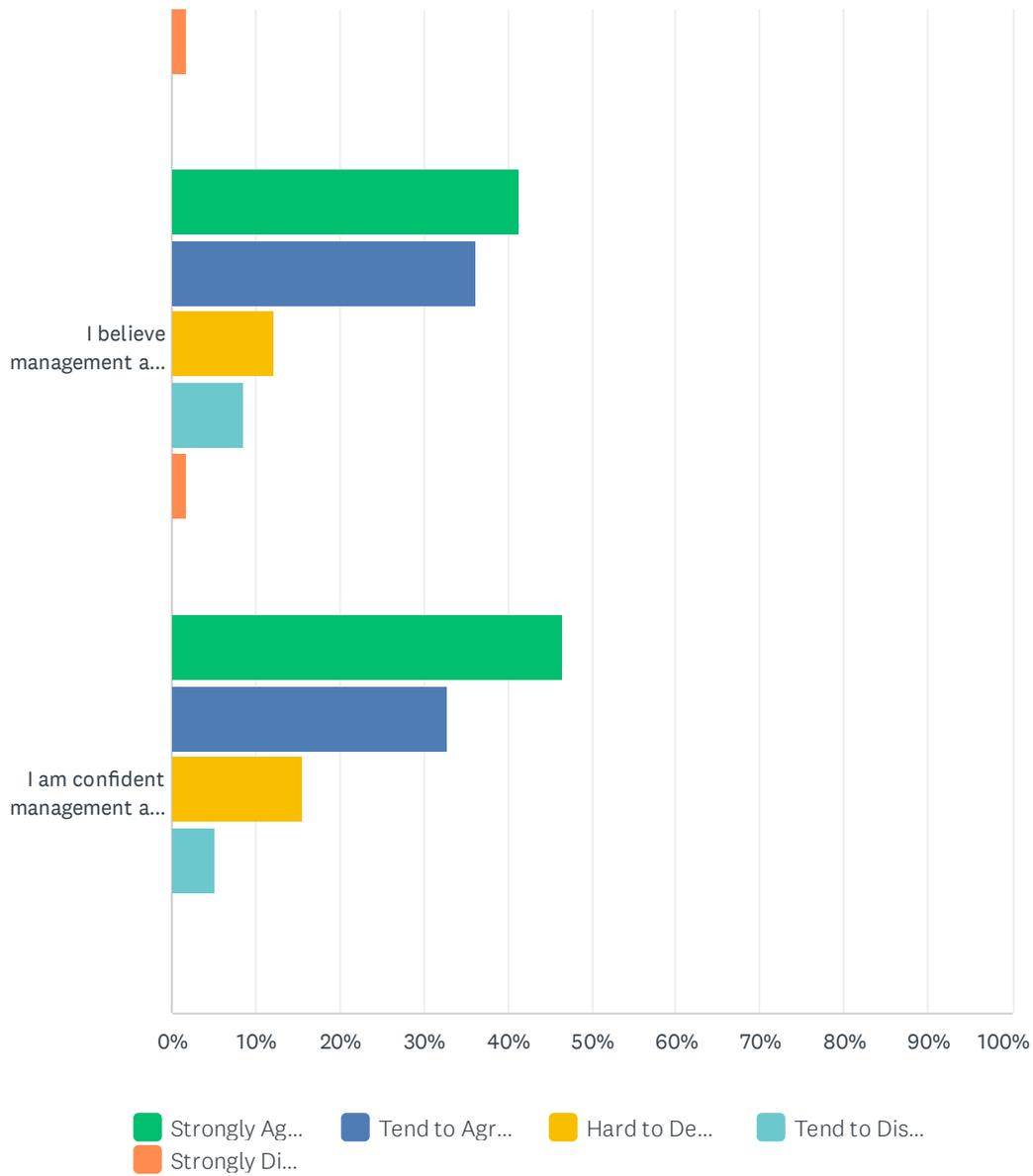
APPENDIX A

Q1 Directions: Read each item carefully and select the answer that best describes your experience at CT.

Answered: 58 Skipped: 0



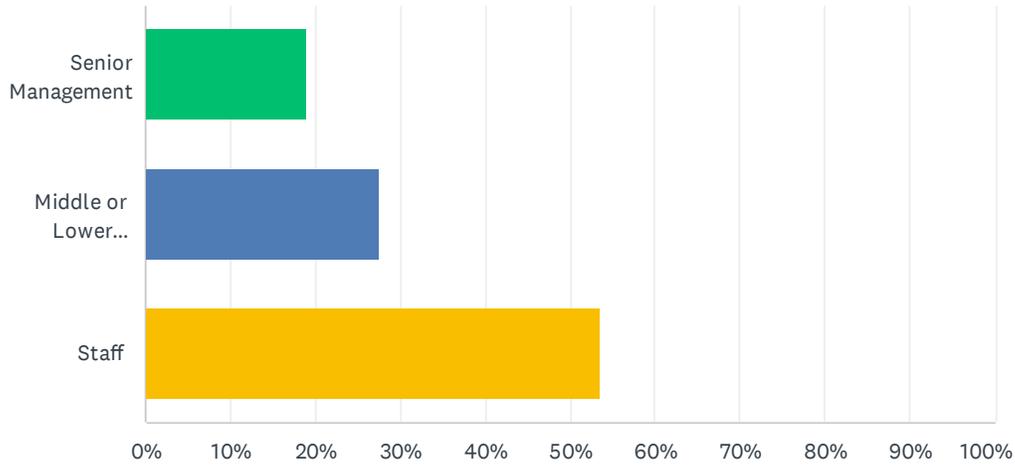




	STRONGLY AGREE	TEND TO AGREE	HARD TO DECIDE	TEND TO DISAGREE	STRONGLY DISAGREE	TOTAL	WEIGHTED AVERAGE
CT demonstrates a commitment to a workplace free of harassment and abuse, including sexual harassment and sexual abuse.	56.90% 33	34.48% 20	3.45% 2	5.17% 3	0.00% 0	58	1.57
I know how to report issues of harassment and abuse within CT.	48.28% 28	37.93% 22	3.45% 2	10.34% 6	0.00% 0	58	1.76
CT provides employees with sufficient training on how to prevent, recognize and report workplace harassment and abuse issues including sexual harassment and sexual abuse.	44.83% 26	44.83% 26	3.45% 2	5.17% 3	1.72% 1	58	1.74
Management at CT responds to reports of harassment and abuse appropriately.	32.76% 19	31.03% 18	32.76% 19	3.45% 2	0.00% 0	58	2.07
I can report concerns about harassment or abuse at CT to management without fear of negative consequences.	55.17% 32	22.41% 13	20.69% 12	1.72% 1	0.00% 0	58	1.69
Management at CT fosters a culture that encourages employees to report concerns and specifically issues of suspected harassment or abuse.	34.48% 20	39.66% 23	15.52% 9	10.34% 6	0.00% 0	58	2.02
Management at CT fosters a culture of transparency and trust.	25.86% 15	25.86% 15	27.59% 16	17.24% 10	3.45% 2	58	2.47
The communication channels to management at CT are clear and open.	32.76% 19	29.31% 17	13.79% 8	22.41% 13	1.72% 1	58	2.31
I believe management at CT wants to learn how employees feel about the workplace culture and will seriously consider recommendations that may improve that culture.	41.38% 24	36.21% 21	12.07% 7	8.62% 5	1.72% 1	58	1.93
I am confident management at CT will respond to a report of harassment or abuse in the workplace in a Christ-centered manner.	46.55% 27	32.76% 19	15.52% 9	5.17% 3	0.00% 0	58	1.79

Q2 How would you describe your role at CT?

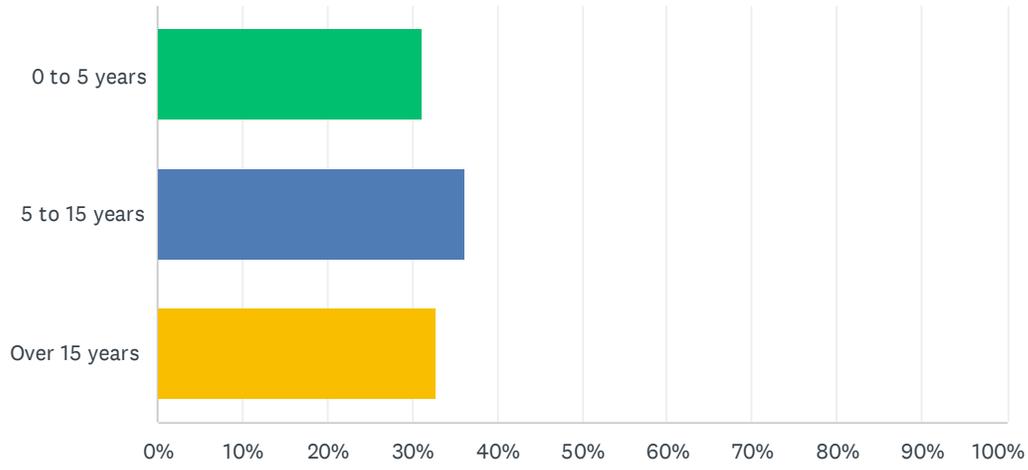
Answered: 58 Skipped: 0



ANSWER CHOICES	RESPONSES	
Senior Management	18.97%	11
Middle or Lower Management	27.59%	16
Staff	53.45%	31
TOTAL		58

Q3 How long have you worked at CT?

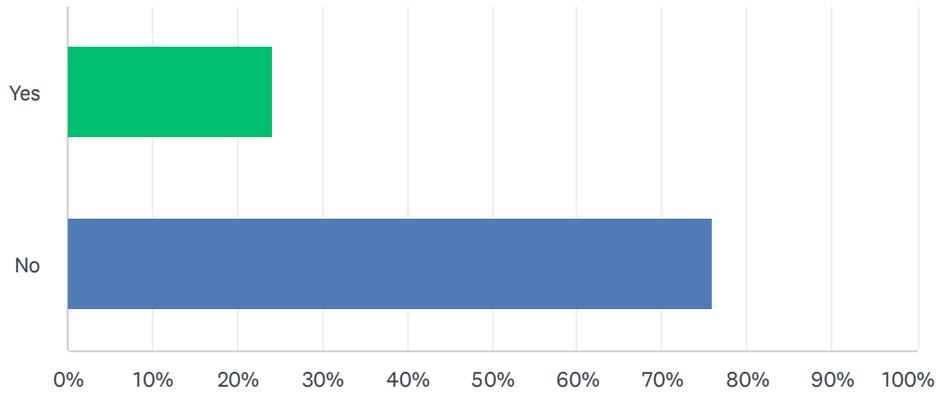
Answered: 58 Skipped: 0



ANSWER CHOICES	RESPONSES	
0 to 5 years	31.03%	18
5 to 15 years	36.21%	21
Over 15 years	32.76%	19
TOTAL		58

Q4 During your employment at CT, have you experienced harassment or abuse of any kind?

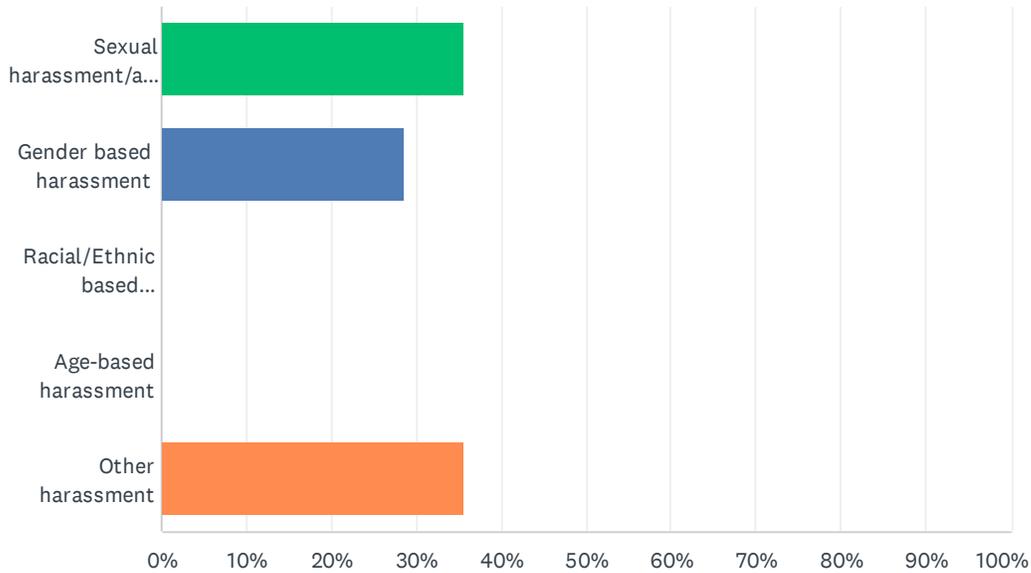
Answered: 58 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	24.14%	14
No	75.86%	44
TOTAL		58

Q5 If “Yes,” please answer the following questions:What form of harassment or abuse did you experience?

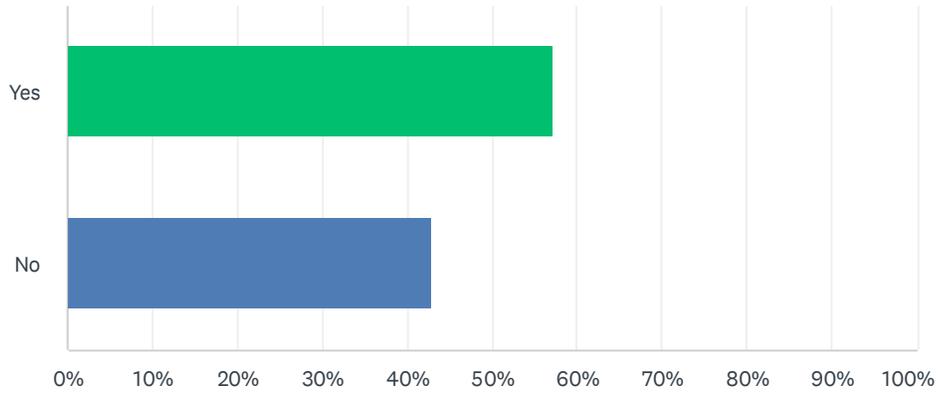
Answered: 14 Skipped: 44



ANSWER CHOICES	RESPONSES	
Sexual harassment/abuse	35.71%	5
Gender based harassment	28.57%	4
Racial/Ethnic based harassment	0.00%	0
Age-based harassment	0.00%	0
Other harassment	35.71%	5
TOTAL		14

Q6 Did you report the harassment to anyone?

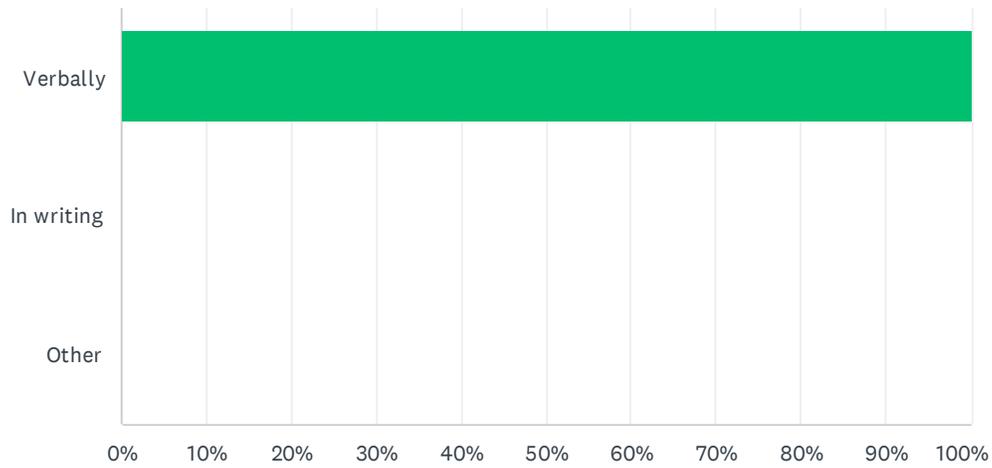
Answered: 14 Skipped: 44



ANSWER CHOICES	RESPONSES	
Yes	57.14%	8
No	42.86%	6
TOTAL		14

Q8 How did you report the harassment?

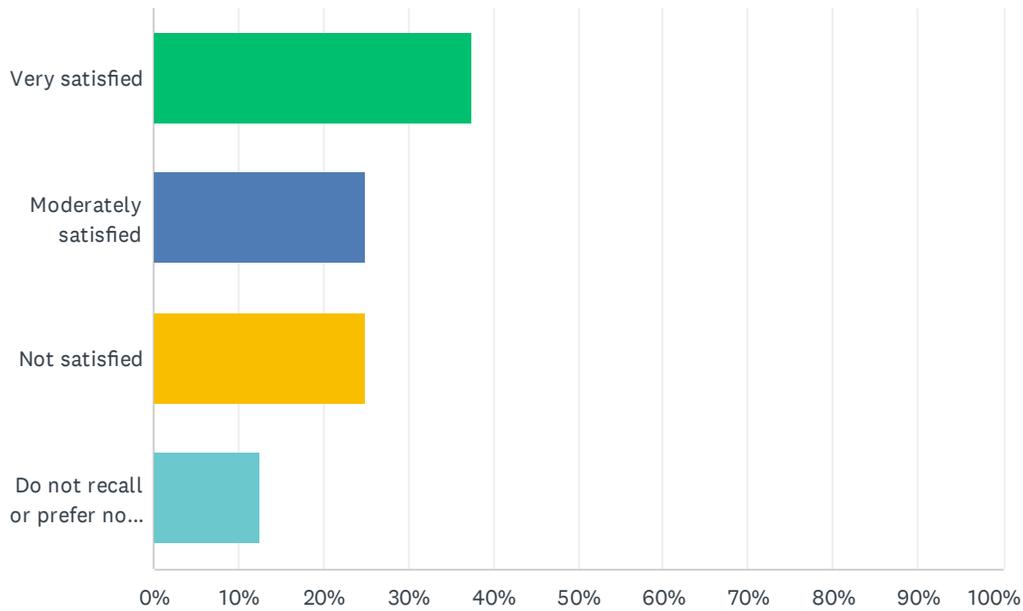
Answered: 8 Skipped: 50



ANSWER CHOICES	RESPONSES
Verbally	100.00% 8
In writing	0.00% 0
Other	0.00% 0
TOTAL	8

Q9 How satisfied were you with the response? Please select one answer.

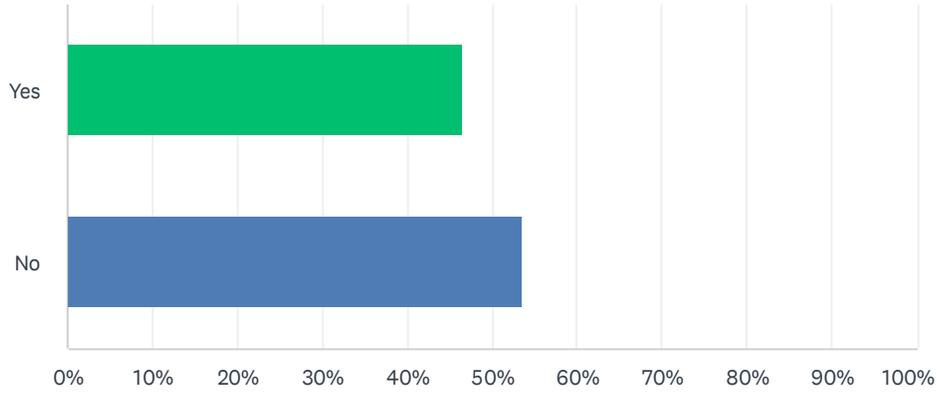
Answered: 8 Skipped: 50



ANSWER CHOICES	RESPONSES	
Very satisfied	37.50%	3
Moderately satisfied	25.00%	2
Not satisfied	25.00%	2
Do not recall or prefer not to answer	12.50%	1
TOTAL		8

Q11 During your employment at CT, have you been aware of any other employee who experienced harassment or abuse of any kind?

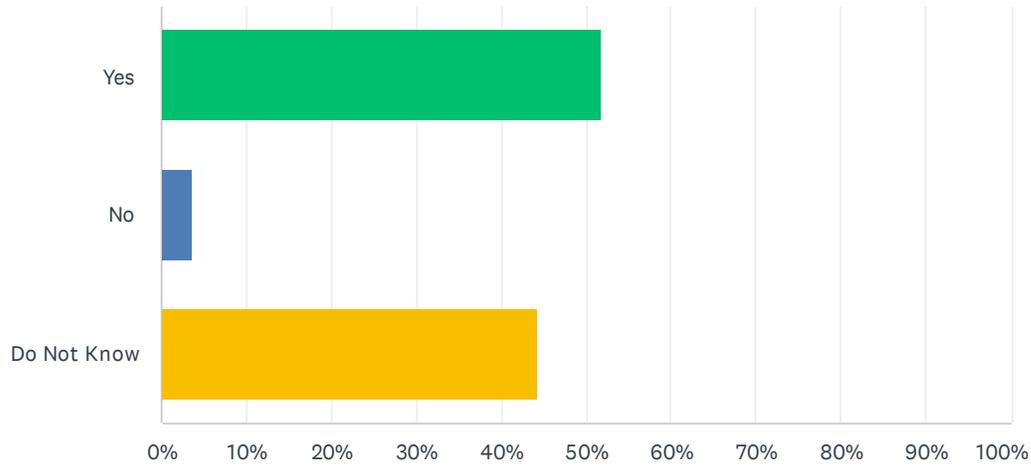
Answered: 58 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	46.55%	27
No	53.45%	31
TOTAL		58

Q12 If “Yes,” please answer the following questions: Did that employee report the harassment to anyone?

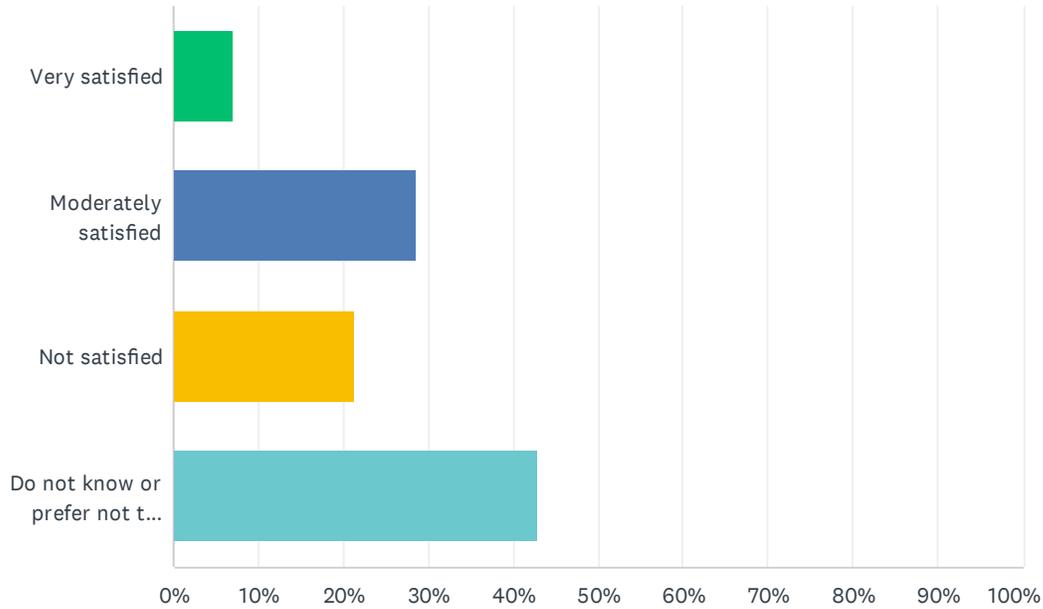
Answered: 27 Skipped: 31



ANSWER CHOICES	RESPONSES
Yes	51.85% 14
No	3.70% 1
Do Not Know	44.44% 12
TOTAL	27

Q14 How satisfied were you with the response, if you know?

Answered: 14 Skipped: 44



ANSWER CHOICES	RESPONSES
Very satisfied	7.14% 1
Moderately satisfied	28.57% 4
Not satisfied	21.43% 3
Do not know or prefer not to answer	42.86% 6
TOTAL	14