
Private Club Advisor™

A Letter to the Directors, Officers, Owners and Managers of Private Clubs

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Dear Club Executive,

HARASSMENT AVOIDANCE... With the recent firestorm of allegations and admissions of sexual harassment and assault erupting across the country, it draws attention to the potential risks for private clubs. A recent article in the *Washington Post* reported that according to figures from the Equal Employment Opportunity Commission, complaints of sexual harassment were higher in the hotel and food industry than any other category. Since clubs provide a similar type of hospitality, club executives should recognize the potential for problems with harassment or assault on club property.

Reviewing current harassment policies and reminding both employees and members to be especially mindful of the importance of proper behavior is strongly advised by attorneys Jeffrey Ruzal and Jeffrey Landes of Epstein Becker Green. To mitigate risks of potential harassment or assault cases at your club, they provide the following recommendations:

- Institute a zero tolerance policy for any sexually inappropriate behavior (communication, relations or touching) toward employees, members or guests. This includes emails, phone calls, text messages or socializing.
- Create an environment where victims (both employees and members) feel safe and comfortable to speak up without retaliation. Investigate all allegations completely and thoroughly.
- Properly train and reinforce employee professionalism. Employees interacting with each other, members and guests in a social setting can result in greater temptation for employees to act in a less formal manner. Regularly reiterate that inappropriate comments, jokes, obscene gestures or insults and inappropriate touching are prohibited.
- Clubs with hotel rooms should never allow employees to be alone with guests, members or other employees in private spaces.
- Train managers and supervisors to avoid instances where they are alone with another employee, especially in the late evening hours.
- Urge employees to report to the general manager any observations of employees, members or guests engaging in any inappropriate behavior, sexual or otherwise.
- Require employees to report to the general manager any instances where they themselves experience inappropriate treatment from members, guests or other employees.

Clubs should be careful to avoid situations that open up the possibility of a potential harassment or assault scenario and should continually communicate with both members and employees on club policies.