

# 7 Pillars of an Effective Harassment Prevention Program

Create a Culture of Accountability Through Policy, Process, and Leadership



Whether you're running a small business or managing compliance across global offices, the overarching objective of any harassment prevention program remains the same: to reduce risk through proactive prevention and ensure timely, effective response when concerns arise. That's no small task as regulations continue to shift and expectations from employees, customers, and other stakeholders steadily rise.

An effective program must do more than exist on paper. It requires clarity in policy, consistency in implementation, and confidence in reporting structures. Employees must understand both the expectations and the protections in place. Leaders must not only support the framework but model its intent. The organization must be equipped to act, document, and improve.

This guide outlines seven foundational elements of a mature, legally sound [harassment prevention program](#). Each element is designed to help organizations move beyond basic compliance and toward a culture where trust, accountability, and respect are operational norms — not aspirational values.

## 1. Develop a Clear, Legally Sound Anti-Harassment Policy

A well-defined anti-harassment policy is the cornerstone of any credible program. It should clearly outline what constitutes prohibited conduct and align with relevant laws across all jurisdictions where your organization operates.

The anti-harassment policy should not stand alone. It works best as part of a broader [compliance framework](#), reinforcing and complementing key documents such as the code of conduct, a reporting concerns policy, and any standalone non-retaliation policy. Together, these resources create a consistent message around expected behavior, how to raise concerns, and the protections in place for those who speak up.

### Key components include:

- Definitions of prohibited conduct aligned with applicable laws
- Multiple reporting paths to leverage: manager, HR, legal, the compliance team, or a hotline
- Clear non-retaliation language
- Annual legal review to ensure continued relevance
- Alignment with related policies, such as the code of conduct

## 2. Deliver Mandatory Employee Training

Training is a core element of an effective harassment prevention program because it brings policy to life. A written policy alone is not enough. If employees do not understand what it says or how it applies to their role, it may offer little protection and in some cases, may increase liability.

**To be effective, learning must be structured, relevant, and regularly maintained. A strong program includes:**

- A foundational module for all employees, like those offered by Mitrtech, featuring real-world scenarios and interactive components to improve retention
- Role-specific content for supervisors, HR, and other leadership roles
- Jurisdictionally compliant material, with clear documentation of completion

Content should be reviewed and updated regularly. Outdated or generic material risks diminishing credibility and may fall short of legal standards. When executed well, effective training does more than educate — it reinforces and embodies the organization's values and priorities.

## 3. Clearly Articulate Reporting Processes

Findings from the 2024 EY Global Integrity Report reveal a troubling trend: 22 percent of employees at large companies reported misconduct in the past two years. Nearly the same share (21 percent) said they had concerns but chose not to report them. The leading reasons were fear of negative consequences and a lack of accountability.<sup>1</sup>

These findings underscore the importance of making your reporting process clear and credible. When employees know their options and trust the protections in place, they are more likely to speak up before issues escalate.

### To strengthen your framework:

- Offer and promote multiple reporting paths, including managers, HR, legal, the compliance team, or a hotline
- Make it clear that these channels are available for any concern, not just harassment
- Communicate non-retaliation protections in plainly and consistently

Employees need to know that [reporting concerns is encouraged and supported](#). Both the policy and training should clearly explain how to report and what to expect. A well-communicated process builds trust and shows the organization is prepared to respond when it matters most.

## 4. Standardize Investigation Procedures

When investigation processes vary by department or region, organizations face increased exposure and risk undermining employee trust.

A standardized approach helps ensure that all concerns are handled fairly, objectively, and in line with legal requirements. To build a consistent investigation framework that maintains credibility and minimizes risk, **take the following steps:**

- Establish clear, step-by-step investigation procedures for the organization, from initial intake through final resolution
- Train designated investigators with both legal and interpersonal expertise
- Apply consistent practices across departments and jurisdictions while accounting for local legal constraints

A well-defined investigation reinforces the message that every report is taken seriously and handled with care.

**Keep in Mind:** Due to regulatory requirements, confidentiality during investigations may not be guaranteed in some regions. Adapting your procedures accordingly and ensuring compliance with local laws is essential.

## 5. Leverage Tools for Documentation and Case Management

Effective oversight depends on reliable systems for tracking and managing concerns. Modern hotline and case management tools provide the structure needed to document issues, maintain control over sensitive data, and monitor trends over time.

### Core capabilities include:

Function	Total Capability
Logging	Time-stamped entries of reported concerns
Access Control	Role-based permissions to protect sensitive data
Reporting	Dashboards and analytics for program visibility

These tools help legal, compliance, and HR leaders identify patterns and prevent recurrence.

## 6. Review and Refresh the Program Regularly

Programs that remain unchanged over time can become ineffective and increase risk exposure. Regular reviews ensure that your policies, training, and processes align with evolving laws, organizational needs, and employee expectations.

### Establish a defined cadence (quarterly or annually) to:

- Audit policies, training content, and reporting procedures
- Incorporate insights from investigations, employee feedback, and regulatory changes
- Update internal communications to reflect the current tone and priorities

Continuous improvement is a core element of program maturity. A proactive review cycle strengthens compliance, builds trust, and ensures your efforts remain relevant and practical.

## 7. Ensure Leadership Alignment and Accountability

Leadership plays a critical role in the success of any compliance program. Yet, gaps in perception persist. A 2024 survey found that while four in ten board members believe it is easy for employees to speak up, only 26 percent of employees agree.<sup>2</sup> This disconnect points to a need for more visible and sustained leadership engagement.

To build credibility and trust, leaders must do more than approve policies. They should actively reinforce program goals and model the values behind them.

### Practical steps include:

- Briefing senior leadership and the board on program performance
- Including compliance metrics in executive dashboards
- Featuring leaders in internal communications to demonstrate visible support

When leadership is engaged, employees notice. And when employees believe leadership is invested, they are more likely to speak up.



"Compliance training starts from the top down. When leaders are involved, it helps everyone better understand the context and importance of the training, reinforcing its significance throughout the organization."

—Madeline Reigh, Director of Enterprise Risk Management at Mitrtech



## Strengthen Compliance. Reinforce Culture.

Harassment prevention is not just a policy; it's a sustained commitment that requires clarity, consistency, and leadership. The seven pillars outlined here create a durable foundation designed to support a long-term, effective program that evolves with your organization and legal obligations.

When employees understand what is expected and see leaders modeling those values, they are more likely to speak up. From there, consistent follow-through and a well-managed program reinforce that trust, building long-term credibility and transparency.

1. Ernst & Young. (2024). *Global Integrity Report 2024*. EY. <https://www.ey.com/content/dam/ey-unified-site/ey-com/en-us/insights/forensic-integrity-services/documents/ey-us-forensic-inaugural-global-integrity-report-final.pdf>

2. Ridley, K. (2024, June 5). Staff warned off whistleblower hotlines, says global survey | Reuters. Staff warned off whistleblower hotlines, says global survey. <https://www.reuters.com/sustainability/boards-policy-regulation/staff-warned-off-whistleblower-hotlines-says-global-survey-2024-06-05/>

