

June 6, 2018 Comments Received from:
Dr. Marlene Adrian: President, Women of Diversity Productions, Inc.

Nevada Gaming Control Board Meeting 9am

My comments are relative to the proposed amendments to Nevada Gaming Commission Regulation 5: Requirements Regarding Implementations of Sexual Harassment Policy by Licensees — Draft Dated: 4/2/2018

This email has been sent to the following:

mBell@gcb.nv.gov, bharris@gcb.nv.gov, sreid@gcb.nv.gov, tjohnson@gcb.nv.gov

My name is Marlene Adrian and I am President of the nonprofit Women of Diversity Productions, Inc. and co-author of the 2017 Gaming Gender Equality Index report, which appears on our website: womenofdiversity.org

I commend the Gaming Control Board on the details for handling complaints of harassment on the required changes for Regulation 5. The changes are thorough and rational.

I, however, believe the same thoroughness is not in the “prevention” aspect of the stated purpose of Regulation 5, specifically, lines 4-9 of section 1:

- *1. Each licensee shall adopt and maintain a comprehensive written plan addressing sexual harassment prevention in the licensee’s workplace, providing the procedures for reporting sexual harassment, detailing the procedures the licensee will follow to investigate a report of sexual harassment, and setting forth the potential consequences for any person within the licensee’s organization found to have committed an act of sexual harassment.*

There are only three statements that directly relate to prevention of harassment policies. The two unequivocal statements on page 2, lines 1-3 may be considered basic to the prevention policies and constitute what will not be tolerated and what is a desirable workplace by the corporation. These may be thought of as threats or mandating acceptance by the employees. They are important. The second statement, however, I would suggest be amended, as shown in red, to clarify the commitment.

(a) An unequivocal statement that sexual harassment will not be tolerated;

(b) An unequivocal statement that there is an organizational commitment to diversity, inclusion, and respect for a safe working environment for all employees; and a prohibition of harassment in that working environment.

The third statement I believe is a key factor for prevention, but is vague and requires an expanded amendment:

(k) A provision requiring regular mandatory sexual harassment prevention training for all employees;

What is sexual harassment training? The mandatory education or training must include discussion, must include what has been termed bias training or education, inclusion education, relationship of diversity to respect, gender dialogue or other required training/educational sessions. The broader focus provides a knowledge of what is harassment, how and why it pervades our society and how power structure and history have perpetuated continuance of sexual harassment of women. These are suggestions of what “harassment prevention training” must mean, but not necessarily the words to use. The use of the word training suggests that a set of statements exists that would be memorized, such as following instructions on how to bake a cake or paint a wall. It is far greater than that; it requires changes in ways of thinking and modifying behavior. The sessions must open the minds of employees to the damage that societal acceptance and tolerance of disrespect and harassment has caused women now and throughout most of history.

Thank you for considering these suggestions for expanding the requirements for policies to prevent harassment.

cc: Executive Secretary Marie Bell
Chairwoman Becky Harris
Member Shawn Reid
Member Terry Johnson