

**The Bill Blackwood
Law Enforcement Management Institute of Texas**

**The Administration of “Zero Tolerance”
Sexual Harassment Policies in Law Enforcement Agencies**

**A Leadership White Paper
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ABSTRACT

Sexual harassment discrimination is one of the most controversial, yet fastest growing, areas of employment discrimination law. Title VII of the Civil Rights Act (1964) prohibits employers with 15 or more employees from discriminating against employees based on sex, with respect to “compensation, terms, conditions, or privileges of employment” (p. 1). This study examines how law enforcement agencies throughout Texas are addressing sexual harassment complaints, investigations, training, and policies.

Training on sexual harassment has increased in police agencies typically starting at the academy level. The amount and scope of this training is questioned by many who believe that law enforcement administrators do not spend the necessary time training their departments on what constitutes sexual harassment and point out that many agencies still do not have comprehensive policies on sexual or any other illegal harassment. This has led to an increase of officers and civilian employees filing federal lawsuits against law enforcement agencies, especially those that do nothing about this ongoing problem.

This leadership white paper assesses the prevalence of sexual harassment in Texas law enforcement and the need for “zero tolerance” policies and annual training for law enforcement agencies. This study will also look at three counter positions against “zero tolerance” policies on sexual harassment. At the conclusion, the research will show that comprehensive policies and quality annual training programs have successfully combated harassment in the work place.

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INTRODUCTION

Sexual harassment first came to national attention in the 1991 testimony of Anita Hill in front of the Senate Judiciary Committee. Ms. Hill testified that she was sexually harassed by then Supreme Court Nominee Clarence Thomas while they worked at a Chicago law firm. Hill's testimony gave women a legal name and framework for what they had been previously experiencing, and they also saw that this behavior was, "illegal, immoral, and wrong" (Glazer, 1999). While there is minimal visible media attention today, sexual harassment is still a highly salient issue (Brown, 2005).

Other high-profile incidents in the early 1990s, such as the Navy Tailhook scandal, are associated with more complaints from individuals filed with the Federal Equal Employment Opportunity Commission (EEOC) (2000), than any other instance. Sexual harassment complaints and lawsuits have doubled and even tripled since the legal definition was created and has been made more visible to victims. "Courts and juries have been awarding increased monetary damages to plaintiffs that have taken their cases to court" ("Sexual harassment charges," 2005).

Today, sexual harassment complaints are quite common in the private sector of the American workplace and have been the subject of academic research. This research has shown that, "Sexual harassment is a widespread phenomenon with serious negative consequences for individuals and organizations" (Knapp, Faley, Ekeberg, & Dubois, 1997, p. 687).

However, allegations of sexual harassment in the workplace are not confined to the private sector. In the public work sector, especially those with male dominated workforces such as, "paramedics, firefighters, the military, and law enforcement

agencies have had and still have their share of sexual harassment claims” (Rubin 1995, p. 4). Of the largest affected of the first responders are law enforcement agencies. There are more than 18,000 law enforcement agencies operating within the United States. This includes municipal, county, state, and educational departments. “Although women have played significant roles in these agencies since the mid-1800s and have been employed as officers since the beginning of the 20th century, law enforcement remains a male dominated work force” (Brown, 2005, p. 4).

In 1964, *Title VII* was enacted by Congress to provide equal opportunity through the removal of artificial barriers to employment. *Title VII* was first put to the test in the landmark case of *Meritor Savings Bank v. Vinson* (1986). In this decision, the United States Supreme Court held that a plaintiff need not suffer a tangible economic detriment from the harassment but must only prove that such harassment created a “hostile work environment.” Evolving almost entirely by judicial review, the legal concept of sexual harassment is now divided into two very distinct categories: quid pro quo and hostile working environment.

Quid pro quo harassment (e.g., this for that) involves allegations by the plaintiff that he or she suffered a loss of substantial job benefits resulting from an employee’s refusal to submit to a supervisor’s demand for sexual favors. “The harassment involves situations where an employee is forced to choose between submission to sexual demands or the loss of job benefits, promotions, or employment” (*Meritor Savings Bank v. Vinson*, 1986).

Cases in this category resemble more traditional race or sex discrimination claims. The employee suffers an adverse employment because of a supervisor’s

discriminatory behavior. In 1980, the EEOC issued guidelines defining *quid pro quo* as a form of sexual harassment. The guidelines state, sexual advances that are unwelcome, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when;

(1) “submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment,” (Title VII, 1964)

(2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such an individual” (Title VII, 1964).

The second category of sexual harassment involves a *hostile or offensive work environment* even though the victim has not suffered the loss of tangible job benefits. As with *quid pro quo* harassment, hostile work claims also involve unwelcome verbal or physical conduct. However, this conduct must have the purpose or effect to either;

(1) unreasonably interfering with an individual’s work performance, or (Title VII, 1964),

(2) creating an intimidating, hostile, or offensive working environment (Title VII, 1964).

To establish unlawful discrimination under the “hostile work environment” standard, a plaintiff must: (1) demonstrate unwelcome harassing conduct; and (2) conduct that is “sufficiently pervasive” as to create a hostile work environment” (Title VII, 1964).

In the 1993 case of *Harris v. Forklift Systems, Inc.*, The U.S. Supreme Court once again made a ruling that would further the definition of sexual harassment. The justices ruled that *Title VII* does not require that both the employee’s psychological well-being and job performance must be seriously affected to constitute an abusive or hostile

work environment. “The court held that an abusive or hostile work environment can only be determined by looking at all circumstances, including but not limited to, adverse work performance and severe psychological harm” (*Harris v. Forklift Systems, Inc.*, 1993).

Finally, in the 1998 case of *Faragher v. City of Boca Raton*, the U.S. Supreme Court expanded who could be held liable for committing sexual harassment. Between 1985 and 1990, Faragher was employed by the City of Boca Raton as a lifeguard. In 1992, she filed suit against the city under Title VII. Faragher alleged that both of her male supervisors created a hostile atmosphere by repeatedly subjecting her and other female lifeguards to uninvited touching, lewd remarks, and speaking of women in offensive terms. Faragher claimed that her supervisors were agents for the city and therefore, can be held liable for their actions. The Supreme Court held that “an employer can be held vicariously liable for the actionable discrimination that was caused by a supervisor employed by them unless the city took “reasonable care” to prevent such behavior” (*Faragher v. City of Boca Raton*, 1998, p. c).

Though the previous cases occurred outside the state, Texas has had its share of sexual harassment instances and is not immune to this type of discrimination. In 1993, Cheryl Steadman had achieved what no other women in the Texas Department of Public Safety had done; she was serving as the first female Texas Ranger. However, her joy quickly turned to frustration and disappointment as her first year was tainted by a pattern of harassment that culminated in a Houston headquarters company meeting where many of the Rangers were drinking, using offensive language, reading crude poetry, and even asking her to cook because she knew how to do it better than they did.

“The unraveling of Steadman’s career as a Ranger has been particularly scrutinized because of her gender. However, some observers believe Steadman’s career was doomed from the start” (Verhovek, 1995, p. 1).

Steadman’s case is not unique. Law enforcement agencies throughout the U.S. and in Texas have continually dealt with this pattern of behavior. Sylvia DeAngelis, a former Lieutenant with the El Paso Police Department, sued the Police Officers Association in the early 90s, alleging the association’s newsletter, *The Silver Badge*, contained comments that amounted to woman-bashing and retaliation against DeAngelis for filing a complaint with the EEOC. In her complaint she cited 10 examples of women officer bashing and direct attacks on her like calling her, “Sgt. Dingy Women”. Other examples include comparing female officers to, “good looking K-9s in the academy” and “defecto police women”.

In 2008, the city manager in Seguin, Texas suspended the chief of police for incidents that included interfering with police custody, abuse of power, and inappropriate personal conduct when he addressed female employees in a derogatory manner. If that was not enough, “he addressed the size of his penis with several members of the department” (Bloom, 2008, p. B1). At the end of the investigation, the city manager was forced to fire the chief because he was found to have participated in this reprehensible conduct towards members of his department. This event shows that police administrators as well as officers are not immune from discriminating behavior.

There are other examples. In November 2017, the city manager in Alton, Texas terminated Police Chief Enrique Sotelo for discriminating behavior after the city received a complaint from one of its officers. In February 2018 former Huntsville, Texas Police

Officer Kimberly Webb filed a lawsuit against the City of Huntsville, its police department, and Chief of Police Kevin Lunsford for retaliation and wrongful termination after filing a sexual harassment complaint to the city's Human Resources Department.

Former Portland Oregon Police Chief Penny Harrington describes it like this; "No matter the setting or geographic location, I saw sexual harassment being confronted and the same mistakes being made. Women have suffered from harassment and discrimination for years and finally could not take it any longer" (Harrington & Lonsway, 2007, p xi). Harrington and Lonsway (2007) stated, "Sexual harassment is not an easy topic for most people to discuss because it deals with our innermost beliefs and feelings about sex, as well as the appropriate roles for men and women in the workplace" (Harrington & Lonsway, 2007 p. xii).

These examples are just a few of how the issue of sexual harassment has come to the forefront of law enforcement agencies over the last 30 years. Moreover, with the growing number of women entering law enforcement, it is perceived that the sexual harassment will continue until the abuse of power and behavior can be corrected. Rabe-Hemp (2007) acknowledged that "although women have been active in law enforcement and working in prisons since the 1800s, it was not until female officers began encroaching on the stereotypically male task of patrol that the debate of the proper role of women in policing commenced" (Rabe-Hemp 2007, 253). According to authors Rabe-Hemp (2007), "Concern over female officers' abilities to maintain the necessary strength and authority, led to the continued resistance to women in the policing culture. This ultimately led to daily harassment and sexism" (p. 253). In workplaces typically dominated by males, women are now competing for those same jobs. This has

somehow led men to believe that they can “put women in their proper subordinate positions” (Welsh 1999, p. 178).

“Because of their small number, female officers experience discrimination in police forces far above what other women face as they work in more traditional fields such as teaching and office work” (Polisar & Milgram, 1998, p. 44). Law enforcement officers are under incredible stress to perform their duties in the fishbowl of public scrutiny. “The battle is supposed to be on the outside; however, pairing officers of the opposite sex to patrol together at all hours creates a fertile environment for personal relationships and/or the potential for harassment complaints” (Irons 1994, p.4).

As the end of the second decade of the 21st century approaches, policing continues to remain a male dominated profession with little signs of reaching equality in the near future. In fact, the International Association of Chiefs of Police [IACP] reports that, “In the United States, the percentage of women in the field of law enforcement has been reported as 9.5% to 11.6% (Polisar & Milgram, 1998, p. 42) to 13%” (23% in correctional facilities) (Harrington, 2000). Women in policing only started to make strides forward in police agencies in the late 1970s and early 1980s. As Harrington and Lonsway (2007) point out, prior to this time women were forced to accept roles in social service, and special units such as training or bureau work. Women were also assigned to clerical, juvenile, guard duty, and vice work (Harrington & Lonsway, 2007). Then in 1972 under Title VII, Federal Law mandated women be given the same opportunity as their male counterparts. Owens (1996) states cities such as Washington D.C., St. Louis, and New York City immediately complied with the law and all placed women on patrol (Horne, 1994). However, this only added to the resentment that many male

officers already felt – resentment that eventually manifested itself into sexual harassment against their fellow female officers.

“Existing literature on police culture defends and explains the theories that male officers drive resistance to female officers” (Brown & Sargent, 1995, p.13). There is wide speculation on the nature and purpose of the police subculture. Even though women represent almost half of the nation’s workforce, “No law enforcement organization in the United States has reported female employment equal to that percentage, suggesting if women do possess a unique subculture, it would be subordinate in strength and power to the male subculture” (Harrington & Lonsway, 2000, p.12).

“The police subculture has also been described as a manifestation of the nature of police work (i.e. stress, shift work, danger), as well as a social structure which exists purposely and specifically to oppress female officers” (Brown & Sargent, 1995, p.12). There is consensus that the police culture is a distinctive occupational subculture that celebrates masculine values, which engender views of women, the nature of policing, and the roles for which men and women officers are believed to be most suitable. Rabe-Hemp (2007) put it this way, “The intrusion of women into the police culture has the potential to change these norms, values and customs and hence has been met with great resistance by male officers” (p. 256).

In 1980 Martin reported, “Most women officers have experienced both sex discrimination and sexual harassment...and frequently these behaviors were “blatant, malicious, widespread, organized, and involved supervisors; occasionally it was life-threatening” (as cited in Rabe-Hemp 2007, p. 254). Despite the resistance of male

officers and slow promotional opportunities, female officers have made significant gains in the police occupation in the past 30 years, especially in larger police agencies. Within these agencies, sworn women hold approximately 10-15% of supervisory positions, including breaking through the barrier and becoming the law enforcement agencies chief executive (i.e. chief of police, sheriff, director, etc...) (Harrington & Lonsway, 2000).

Rural and small-town agencies have made great strides but have not maintained that same growth. A report written regarding women in small and rural communities found, "Women were severely under-represented and disproportionately over represented in the lower tiers of the rank structure" (Harrington & Lonsway, 2000). This is mainly the result of a lack of recruiting from the agency, smaller salaries, and fewer opportunities to expand one's career beyond being a patrol officer in the field than those of larger departments who have the budgets to keep up with salaries and offer many opportunities for lateral advancement. However, when women are represented in these smaller agencies, it is likely these officers experience a more hostile environment because of the lack of oversight and resources.

Law enforcement agencies throughout Texas could potentially have difficulties with harassing behavior, not only from the rank and file but from the mid-level managers up to administration. One reason for this continued harassment is a lack of awareness or perception that sexual harassment is still not a priority for some law enforcement administrators and there is evidence of this avoidance. This avoidance attitude has the potential to produce potentially dangerous outcomes for women, officers whom have alternative lifestyle choices, and civilians working in their agencies. To combat this

lethargic attitude, law enforcement administrators should be at the forefront of a hostile free work zone by offering annual training classes on sexual harassment, create or update sexual harassment policies, and finally take a zero-tolerance stance on sexual harassment in the workplace.

POSITION

In their book *Investigating Sexual Harassment*, Harrington and Lonsway (2007) explained that the one of the most effective ways to achieve a workplace free from harassment is, "A comprehensive policy that communicates that the organization has a zero-tolerance attitude when it comes to violations of sexual harassment". Zero-tolerance policies need to be responsive to the misconduct and consistently enforced to rid the organization of this type of discrimination. Plass (2005) stated, "Zero-tolerance policies should also come with accountability that is swift, absolute, and consistent" (p. 13).

Therefore, administrators should seriously consider their view and stance on creating a comprehensive policy and training program. Harrington and Lonsway (2007) point out that, "Agencies need to have strong policies and directives that prohibit such conduct and provide a thorough investigation of any allegation of unlawful harassment". These policies should not only spell out effective and appropriate disciplinary action in cases of harassment that can be substantiated, they should also direct that all department employees should attend or perform annual training on sexual harassment and other forms of discrimination. By articulating these and other goals in zero tolerance policies, leaders will see a rapid decline in the number of sexual harassment complaints.

When creating a comprehensive policy it must outline procedures for the reporting, investigating, and conclusion of all sexual harassment complaints. Currently, most policies consist of language that is taken directly from the EEOC definition. This definition may cover sexually explicit comments, but demeaning comments about women officers or their job effectiveness may not be covered. In addition, comments about a person's effectiveness can be construed as a hostile environment complaint and should be reviewed, taught and covered in any type of training environment.

Reese and Lindenberg (2003) pointed out that, "Agencies where more employees attend training more frequently and where supervisory and employee training is viewed as being effective have higher levels of satisfaction with the policy and procedures for dealing with a complaint of sexual harassment" (p. 183). They further go on to say that, "There are several more forces that appear related to policy satisfaction. Studies have shown that there is a direct correlation between fewer hostile work environment issues and policy satisfaction" (Reese & Lindenberg, 2003, p. 180).

Harrington and Lonsway (2007) suggest that, "Training on sexual harassment must be done with a consensus among administrators and must be done by experts" (p. 80). Training should not stop at the orientation process but needs to be ongoing. Ideally, sexual harassment training should be done annually, and the participants should be made to sign a training roster acknowledging they have received such training. Once signed, a copy of the roster should be placed in the employees' personnel file. "They go on to advise that this action can reduce the liability of the department against future litigation" (Harrington & Lonsway, 2007, p. 80).

With continued training in mind, Polisar and Milgram (1998) say that, "Training on the topic of sexual harassment is taught in a lecture format that prompts many participants to "tune out" because they feel the topic is "dry" (p. 44). Other training delivery methods such as online training have become convenient for administrators and officers. However, most officers move through these courses as fast as they can without really absorbing the information and take a test that you have multiple chances to complete. Polisar & Milgram (1998) went on to say that "If administrators want the message of prevention to take effect and be effective, they need to come up with different delivery methods", such as having the participants work in groups, use real world examples and get everyone in the class to participate. (p. 44). By performing training in this type of format, it gives the employees an understanding, and they feel as if they are contributing to their own training.

Altman and Kumalo (1995) both agree that "training is also more effective when sworn officers who are not supervisors perform the instruction" (p. 21). The participants are in a more relaxed environment. It also allows personnel attending to express opinions and concerns without the worry of retaliation.

Even with the continued need of training, it is important to focus on a change in the environment. Sexual harassment should be understood as a threat to the health and safety of workers. "It must become the priority of law enforcement administrators that members of their organization be protected from discrimination in all forms including the hostile environment that could cause both psychological and physical damage to the officer" (Altman & Kumalo 1995, 69). This will eventually lead to a reduction in that officers' productivity.

“It should be made mandatory that supervisors get additional training to outline their responsibilities for preventing, detecting, and responding to problems of sexual harassment” (Harrington & Lonsway, 2007, 82). A message that is essential for supervisors is that they need to avoid even the appearance of blaming the complainant for any reported sexual harassment. “This element is considered more important than any other in determining their perceptions of the fairness and effectiveness of the complaint procedure” (Harrington & Lonsway, 2007, 83).

Along with training, department policies should be created and enforced. According to Plass (2005) “Zero-tolerance policies are helping make discrimination as socially unacceptable as stealing and workplace violence” (p. 132). Plass (2005) also emphasized that, “Zero-tolerance policies need to be responsive to the gravity of the misconduct and consistently enforced in order to rid the workplace of the prohibited behavior and to avoid discrimination claims” (p. 133).

Comprehensive zero-tolerance policies help compliment the EEOC definitions of sexual harassment and show that the agency is serious about getting rid of the culture of discrimination. Simply adopting the EEOC guidelines may communicate to personnel that the organization does not take seriously the issue of sexual harassment. It is because of this reason that sexual harassment policies must be written in such a way that it clearly communicates the organizations zero-tolerance stance along with other behaviors that are not appropriate. The policy must also communicate that any complaint will be immediately investigated and that the officer shall be held accountable for their actions.

COUNTER ARGUMENTS

With the absence of zero-tolerance policies, this leads some to say that sexual harassment continues to thrive in both the public and private sectors. However, Federal Courts, through recognizing an employer's affirmative defense to *Title VII* claims, has given organizations a great economic incentive for policing and punishing employees who engage in sexually harassing behavior. However, "zero-tolerance need not mean discharge on the first offense regardless of the nature or severity of the conduct" (Plass, 2005). Without frustrating the policies or goals of the agency, administrators should only seek to change the behavior of the individual and punish based on the circumstances of the incident.

However, law enforcement administrators should remain sensitive to the reality that *Title VII* laws do not prohibit or seek to eliminate all workplace conduct that may be considered tactless. Plass (2005) stated that employers should be wary of policies that provide for harsh discipline or discharge on the first occurrence even when the misconduct was not serious. All employees have a constitutional right to due process, which requires that discipline, when handed out, must remain just and reasonable based on the circumstances of the complaint.

"Because of the vagueness in *Title VII*, the subsequent adoption of zero-tolerance policies reflects the difficulty in forcing changes in existing gender norms and status relations" (Tinkler, 2012). "Studies have shown that there is resistance from men who are called upon and asked to mentor female colleagues because of the fear of complaints" (Epstein, Saute, Oglensky, & Gever, 1995 p. 331). This has ultimately led to a backlash against zero-tolerance policies by both males and females.

While researching his publication, Tinkler (2012) wrote that scholars contend that part of the reason women's (and men's) definitions of sexual harassment are narrower than legal definitions is that sexuality is natural and very much part of many workplaces and is often experienced as pleasurable. A law or policy that largely targets the behavioral style of men and women may disadvantage both sexes in their pursuit of a romantic relationship (Tinkler, 2012). In support of this point, Giuffre and Williams (1994) showed that people are more likely to perceive sexual attention as harassment when interaction norms have been violated. But when the behavior conforms to natural tendencies and normal attractions, sexual harassment rules pose no threat to normal interactions.

Finally, many women perceive reliance on zero-tolerance policies as an indicator of weakness (Tinkler, 2012). Observations of policy training sessions showed that gender stereotypes are often made noticeable, and both men and women look down on women who complain about sexual harassment. Given women's tenuous status, especially in a male dominated workforce, some of the resistance to sexual harassment law is rational as it has been shown to activate traditional gender stereotypes. Men resist the law for the threat it poses to their own status, while women resist the law for the threat to their status that complaining may invoke. That is, while women and men both highlight the negative ways that the law has been misused by women, their unequal locations in the status hierarchy lead to different underlying reasons for this resistance (Tinkler, 2012 p. 19).

RECOMMENDATION

Sexual harassment will continue to happen in the workplace as long as law enforcement continues to be a male dominated workforce. However, law enforcement administrators can take great strides towards combatting sexual harassment by taking proactive measures to educate, prevent, and correct this questionable behavior, by doing everything possible to avoid legal action and the potential damage to their organization. These proactive steps include annual training (in a variety of formats), comprehensive policies and finally creating a professional working environment where any type of discrimination will not be tolerated.

The purpose of this leadership white paper is to examine zero tolerance policies on sexual harassment in Texas law enforcement agencies and how those policies will aid in the reduction of sexual harassment in the workplace. The paper addressed the questions: Why should policies be zero tolerance, should training be implemented along with policies and, whom needs to be trained. While developing a conclusion, the researcher had the opinion that no matter of the size of the agency, sexual harassment policies and annual training can be implemented at a minimal cost to the agency. The researcher also came to the opinion that departments, “Could not afford not to do it”.

Law enforcement administrators know that women report the occurrences of sexual harassment more than men, but administrators also know that many occurrences still do not get reported because of fear of backlash and the stigma it may cause. The lack of reporting stems from mid-level managers (Sergeants and Lieutenants) attitude that there is not a problem. It is written off as jocularly or to assess the officer’s status as, “Just one of the boys” or are they conforming to our

agency. Brown (2005) wrote that a likely explanation for this troubling denial is the fact that the more zealously an agency disseminates an anti-harassment policy complete with complaint procedures, the more prevalent complaints of proscribed conduct. Yet many agencies are still in their infancy when it comes to completing these important steps to creating a zero-tolerance policy. The problem of sexual harassment is not going away but with continued education, policies and zero tolerance attitudes toward this type of discrimination, administrators can come a long way in resolving this issue.

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