Teenage peer sexual harassment: implications for social work practice in education.

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Peer sexual harassment is a problem for both girls and boys in the educational environment, and the effects from this experience can affect students' lives negatively past high school. Many students report school performance difficulties as a result of sexual harassment, including absenteeism, decreased quality of schoolwork, skipping or dropping classes, lower grades, loss of friends, tardiness, and truancy. These symptoms in turn can lead to ineligibility for specific colleges or merit scholarships and loss of recommendations for awards, colleges, or jobs. All of these factors lead to fewer career choices and decreased or lost economic opportunities and possible job failure that can affect a student for the rest of her or his life (Stein, Marshall, & Tropp, 1993; Strauss & Espeland, 1992).

Strauss and Espeland (1992) studied sexual harassment in high schools in Minnesota. They observed that

many students say that sexual harassment is the norm in their schools. There have been numerous reports of sexual assaults and rapes on school grounds and in school buildings. In an environment that condones sexual harassment, everyone is a victim, not just those who are direct targets of the harassment. All students come to see school as an unsafe place, hostile and intimidating. They may alter their own behaviors in an attempt to decrease their sense of vulnerability. (p. 7)

Strauss and Espeland (1992), Stein et al. (1993), and the American Association of University Women (AAUW, 1993) Educational Foundation identified sexual harassing behaviors at the secondary school level. The AAUW report Hostile Hallways (1993) listed 14 types of sexual harassment and asked 1,600 high school students if someone had done any of the following things to them:

- 1. made sexual comments, jokes, gestures, or looks
- 2. showed, gave, or left you sexual pictures, photographs, illustrations, messages, or notes
- 3. wrote sexual messages/graffiti about you on bathroom walls, in locker rooms, and so forth

- 4. spread sexual rumors about you
- 5. said you were gay or lesbian
- 6. spied on you as you dressed or showered at school
- 7. flashed or "mooned" you
- 8. touched, grabbed, or pinched you in a sexual way
- 9. pulled at your clothing in a sexual way
- 10. intentionally brushed against you in a sexual way
- 11. pulled your clothing off or down
- 12. blocked your way or cornered you in a sexual way
- 13. forced you to kiss him or her
- 14. forced you to do something sexual, other than kissing. (p. 5)

Peer sexual harassment in high school also can include "spiking" or pulling down someone's pants, "snuggies" or pulling underwear up at the waist so it goes in between the buttocks, and being listed in "slam books," which identify students' names and have derogatory sexual comments written about them by other students (Strauss & Espeland, 1992).

In the AAUW Educational Foundation (1993), study four of five students reported being sexually harassed, and of those, 79 percent stated the harassment was by a peer. Most of the literature on sexual harassment indicates that over 90 percent of the time males are the perpetrators of sexual harassment against females (Langelan, 1993; Stein et al., 1993; Strauss & Espeland, 1992). The AAUW study was the first to document a high level of sexual harassment experienced by boys as well as girls. These findings are very different from the university and workplace literature that showed the sexual harassment of men in the workplace or university to be between 2 percent and 15 percent, while for women the range was from 40 percent to 53 percent (Fitzgerald et al., 1988; Gutek, 1985; Metha & Nigg, 1983; Pryor, La Vite, & Stoller, 1993; U.S. Merit Systems Protection Board, 1981, 1987). Gender issues are central to the understanding of peer sexual harassment, and this article will focus on them. However, it also is important to understand peer sexual harassment as a sex discrimination issue.

Sexual Harassment and Sex Discrimination

Sexual harassment is a specific type of sex discrimination that has been defined by the courts over the past 30 years. Despite legislation to make sex discrimination and sexual

harassment illegal, discrimination against women in the U.S. educational system continues (O'Gorman & Sandler, 1988; Stein et al., 1993; Strauss & Espeland, 1992). Specific examples of sex discrimination can be seen in the form of denying women equal opportunity for the receipt of scholarships or their lack of participation in school-sponsored sports or job-training programs.

The AAUW Educational Foundation (1992) report How Schools Shortchange Girls outlined five areas in which high school girls lagged behind boys. Fewer girls were identified as candidates for special education. Girls had lower standardized test scores than boys, and did not perform as well as boys in science and math, so far fewer girls pursued scientific or technological careers. Girls did not have access to the same vocational training as boys because of dated, sex-segregated course selections. Girls' participation in sports was still half that of boys, mostly because of less funding and fewer staff for girls' sports activities.

Because gender as a protected class was amended to the Civil Rights Act of 1964, there has been controversy surrounding the issue of providing equal educational opportunities for females. An example of this issue can be seen in the current debate involving the formerly all-male, tax-supported military academies, the Virginia Military Institute and the Citadel. Until a recent Supreme Court decision, both schools denied women access to education as full cadets. A women's academy had applied for federal funding to provide an "equivalent" educational experience for young women; however, the question regarding whether providing women with an education that is "separate but equal" is an equivalent educational opportunity has now been answered: No, it is not (United States v. Virginia et al., 1996).

In 1972 Title IX of the Education Amendments Act sought to address the educational needs of minorities and women. It was believed that equal access to education was a necessary complement to Title VII of the Civil Rights Act and imperative for women to gain the skills and training necessary for access to higher-paying jobs, particularly in fields such as engineering and the sciences. It also prohibited sexual harassment in education and directed educational institutions to maintain a grievance procedure that allows for prompt and equitable resolution of all sex discrimination, including sexual harassment.

In general, the interpretation of what constitutes sexual harassment in the education setting has followed the concepts developed under employment discrimination law. Title VII of the Civil Rights Act of 1964 provides the main framework prohibiting discrimination on the basis of race, color, religion, national origin, and gender. In 1986 the Supreme Court identified two forms of sexual harassment: quid pro quo and hostile environment. Quid pro quo applies when a person in a power position (a supervisor or teacher) makes decisions that affect an employee's job or a student's grade on the basis of whether the employee or student complies with his or her sexual demands. Hostile environment applies when the harassing behavior of anyone in the workplace (not only a supervisor or teacher) causes the workplace to become hostile, intimidating, or offensive and unreasonably interferes with an employee's or student's work (Langelan, 1993).

It is the hostile environment definition that is most closely aligned to peer sexual harassment and includes part three of the Equal Employment Opportunities Commission guidelines, which holds employers responsible for the actions of their employees. In education this definition has been expanded to include a school's responsibility for the actions of both its employees and students.

Title IX of the Education Amendments of 1972 requires that an institution receiving federal funds provide an environment free of discrimination:

Title IX applies to any educational institution's programs or activities that receives federal funds and protects both employees and students. Sexual harassment of students is a violation of Title IX of the 1972 Education Amendments in that it constitutes differential treatment on the basis of sex.

O'Gorman and Sandler (1988) noted that Title IX "clearly prohibits sexual harassment of students by faculty and staff. It can also prohibit harassment of students by students as well" (p. xx). It is of interest to note that most of the literature regarding sexual harassment pertains to the workplace and university and that sexual harassment legislation in both of these settings have closely paralleled one another. There have been few studies specifically addressing the problem of sexual harassment at the high school level.

Research on Peer Sexual Harassment

Sexual harassment of students can be divided into two distinct types: (1) adult to student or (2) student to student. Much has been written about adult (or professor) to student and peer to peer at the university level (Dziech & Weiner, 1990; Fitzgerald et al., 1988; O'Gorman & Sandler, 1988); however, few studies have been done to document either type of harassment at the high school level.

Overall there have been five surveys conducted on teenage sexual harassment (AAUW Educational Foundation, 1993; Fineran & Bennett, 1995; Permanent Commission on the Status of Women (PCSW), 1995; Stein et al., 1993; Strauss & Espeland, 1992). Three of the five surveys focused primarily on determining the incidence and prevalence of sexual harassment in high school; the other two also addressed the types of relationships the students had with one another and who experienced sexual harassment.

Strauss and Espeland

Strauss and Espeland (1992) surveyed student leaders from 13 school districts at a Minnesota State Sex Equity Student Leadership Conference in 1991. They also surveyed 250 female high school students from four school districts in Minnesota, where "approximately 50 percent of the teenage girls reported having been verbally and physically harassed at school and another 30 percent stated they had been harassed at work" (p. 3). Both surveys used convenience samples and asked if sexual harassment

occurred in the school, how often it occurred, and to whom it occurred. Specific sexual harassment behaviors were identified, and students were asked whether an adult or another student was involved in the harassment. Some contextual issues were identified, such as when and where the harassment occurred.

AAUW Educational Foundation

The AAUW study Hostile Hallways, conducted by Louis Harris and Associates in 1993, consisted of 1,632 questionnaires completed by public school students in grades 8 through 11 from 79 schools across the continental United States. A random sample of schools was selected from the database of public schools at the National Center for Education Statistics. A proportionally drawn sample by grade and regional location was used, and the study can be generalized to all U.S. public school students in grades 8 through 11. The survey consisted of 40 questions and addressed sexual harassment with regard to frequency; type (physical and nonphysical); grade level of first experience; frequency of adult to student; frequency of peer to peer; location; and impact on students' education (cutting classes or school absence), emotional state, and behavior (avoiding the harasser). The AAUW study addressed both the perpetration and experience of sexual harassment.

Hostile Hallways documented that the majority of sexual harassment that occurs in American high schools is between peers. Eighty-seven percent of the girls and 71 percent of the boys reported being sexually harassed by a current or former student at school, and one in four girls and one in 10 boys reportedly had been targeted by adult school employees.

Sixty-six percent of all boys and 52 percent of all girls surveyed by the AAUW Educational Foundation admitted they had sexually harassed someone in the school setting. Only 4 percent of these boys and girls said they had harassed an adult. Of the 59 percent of students who said they had sexually harassed someone in the school setting, 94 percent claimed they themselves had been harassed (98 percent of girls and 92 percent of boys). The fact that 79 percent of students reported being harassed by peers and 59 percent reported harassing other students leaves a minority of students experiencing a stress-free secondary education.

The AAUW study yielded important descriptive information regarding the prevalence of sexual harassment within the school system. It clearly identified who was being sexually harassed, when they were being harassed, and where. Students were asked why they engaged in sexual harassment and which of the six reasons listed below applied to their behavior:

- 1. It's just a part of school life/a lot of people do it/it's no big deal.
- 2. I thought the person liked it.
- 3. I wanted a date with the person.

- 4. My friends encouraged me/pushed me into doing it.
- 5. I wanted something from that person.
- 6. I wanted the person to think I had some sort of power over them.

Stein et al.

Stein et al. (1993) and the Wellesley College Center for Research on Women conducted a survey in conjunction with the National Organization for Women Legal Defense and Education Fund that was published in Seventeen magazine in September 1992. This endeavor resulted in the 1993 report Secrets in Public: Sexual Harassment in Our Schools. Over 4,200 girls returned the surveys. The girls ranged in age from nine to 19 and were in grades 2 through 12. Ninety percent of the girls were in public schools, 6 percent were in private schools, and 3 percent were in parochial schools. Ninety-nine percent of the schools were coeducational. Eighty-nine percent of the respondents were white, 2 percent were African American, 3 percent were Latino, and the remaining 6 percent were of other backgrounds. The girls' responses provided detailed information about their personal experiences of sexual harassment.

The Seventeen survey consisted of six questions and addressed sexual harassment according to frequency (adult to student and peer to peer), type (physical and nonphysical), location (public or private), reaction to the harassment, and school response to the harassment. The most common forms of sexual harassment girls experienced were sexual comments; gestures or looks; and being touched, pinched, or grabbed. Thirty-nine percent of the girls reported that they experienced these behaviors every day. Ninety-seven percent of the harassers were identified as male peers, and 1 percent were identified as female (Stein et al., 1993).

PCSW

The Connecticut PCSW (1995) conducted a survey in cooperation with the University of Connecticut School of Social Work. Five hundred and forty-seven public high school students in grades 10 through 12 completed surveys. Seventy-eight percent of students surveyed experienced sexual harassment (92 percent of girls, 57 percent of boys). Of the students, 78 percent were white, 8 percent were African American, 6 percent were Latino, and 4 percent were Asian. This was a representative sample of male and female students from seven school districts determined by the Connecticut Department of Education and reflected the socioeconomic status and age representation of the Connecticut student population. Thirty-five percent of harassing events were perpetrated by a schoolmate the student knew casually, and 9 percent of harassing events were perpetrated by a schoolmate the student did not know. Twelve percent of harassing events were perpetrated by students who were boyfriends or girlfriends. Half of the boys and 75 percent of the girls reported being upset by the experience of sexual harassment at school. The victims reported that 75 percent of the perpetrators were male and 25 percent were

female.

Fineran and Bennett

Fineran and Bennett (1995) surveyed 342 students in a large, midwestern, urban high school. Their convenience sample reflected a high ethnic minority student population of 43 percent African American, 24 percent Latino, 14 percent white, and 11 percent Asian. Students were asked about the experience and perpetration of sexual harassment, how upset or threatened they were by these behaviors, and the relationship between perpetrator and victim. Students also completed two scales measuring beliefs about personal and gender-based power. Eighty-four percent of the students experienced peer sexual harassment (87 percent of girls and 79 percent of boys), and 75 percent reported perpetrating sexual harassment. Results also documented that boys perpetrated sexual harassment twice as often as girls. Sixty percent of harassing events were perpetrated by a schoolmate the student knew casually, 15 percent by a schoolmate the student did not know, and 25 percent by students in dating or ex-dating relationships.

Research Comparison

Problems became evident when comparing these five studies. The documentation of frequency of sexual harassment is not consistent. The Strauss and Espeland (1992) survey had no time constraints and generally asked whether a student had been sexually harassed at school. The AAUW Educational Foundation (1993) study also was very broad and asked about sexual harassment during the students' entire school life. The Wellesley (Stein et al., 1993) and Fineran and Bennett (1995) studies asked only about sexual harassment that occurred during the past year, and the PCSW (1995) study extended the time frame to sexual harassment that occurred during high school. Because sexual harassment experiences can be numerous and very different, it becomes difficult to describe an overall experience without forcing the respondent to actually pick one incident out of many.

All five surveys used similar sexual harassment behavior items, although the number of items in each survey ranged between seven and 26. Also, some of the items were considered discrete behaviors, whereas others were combined into an index. Only the AAUW study can be generalized to the national school population. The other studies, although of interest, sampled student populations that limited findings to one state, a magazine readership, and two high schools. The Strauss and Espeland and Wellesley studies surveyed primarily girls, whereas the other three studies included boys.

It is apparent that the literature is rich with information regarding the individual areas of teenage development, adolescent relationships, power, sexual harassment, and gender issues; however, there is no specific body of knowledge or research that intertwines these topics and relates them to teenage peer sexual harassment. The literature provides numerous insights into male perpetration of sexual harassment in the workplace, and research supports a low adult male victimization rate; however, there is no understanding of the egalitarian teenage experience of sexual harassment in which males and females

are both perpetrators and victims, which is so unlike the adult world they will enter.

Further investigation of teenage peer sexual harassment is needed to create a more complete understanding of the factors and context that contribute to and sustain it within the high school environment.

Social Work and Peer Sexual Harassment

Understanding the dynamics of teenage peer sexual harassment has important theoretical and practical implications for researchers and practitioners in educational and mental health environments. The broad issue of sexual harassment in the workplace and university settings has been understood as sex discrimination and treated by legal means. Peer sexual harassment in high school has only recently been documented and been viewed as being remedied through a legal process. However, a legal solution to peer interaction in high school is complicated by the time it takes to process a case through the legal system and the illogical idea that relationships among teenagers can be legislated. Although a legal approach may be needed initially to have school systems recognize peer sexual harassment as a problem, this is an expensive effort. Litigation could cost school districts, and ultimately taxpayers, large amounts of money.

Most studies indicate that peer sexual harassment is a gender issue, so that girls in particular are targeted by this behavior. Gender, power, and hierarchy fall broadly under social justice issues, in which sexual harassment is viewed as sex discrimination that affects women negatively. The fact that peer sexual harassment can be viewed as supporting a gendered hierarchy contributes to the need for education and training that encourages a more egalitarian environment and discourages discrimination against girls. It is important to note, however, that all students are affected by these behaviors and that programs that address negative attitudes toward women will benefit both men and women. By broadening the issue of sexual harassment, social workers may find that they are able to educate administrators, teachers, and students about discrimination in general and show how power and gender issues create oppression in a school environment.

Another way to understand peer sexual harassment uses a mental health perspective. The AAUW Educational Foundation (1993) and PCSW (1995) studies found that students who experienced sexual harassment reported more school absence, lowered concentration, and less participation in class. These studies also reported physical symptoms that included sleep disturbance and appetite changes. Overall, students reported feeling angry, upset, and threatened by sexual harassment, all of which contributed to lowered self-esteem and confidence (AAUW Educational Foundation, 1993; Fineran & Bennett, 1995; PCSW, 1995; Stein et al., 1993; Strauss & Espeland, 1992).

Given that these studies indicated that students experience peer sexual harassment as upsetting and threatening, school administrators may approach this problem in two ways. The first way is to take steps against a hostile environment by setting school policy on peer sexual harassment and actively enforcing this policy. School social workers can be

instrumental in the construction of such a policy and active in its deployment and evaluation. The second way is to develop supportive, direct services for students that address peer sexual harassment as a mental health issue. School social workers can play a critical role in decisions about reducing conflict within the school environment and can provide necessary support that improves individual students' self-esteem, sense of well-being, and motivation to learn.

Peer relationships among teenagers also remain problematic and indicate yet another reason for identifying this as a school "climate" problem with mental health implications. Peer sexual harassment falls in the domain of gender harassment and violence and may contribute to an environment that supports negative images of women and promotes dating violence. More girls than boys experience peer sexual harassment from dating or ex-dating partners; in particular, girls are more likely to experience the more physical forms of sexual harassment. On the basis of the number of students in dating or ex-dating relationships who identified themselves as being sexually harassed, dating violence among high school students continues to be an area requiring proactive education and intervention (Bergman, 1992; DeKeseredy & Schwartz, 1994; Molidar, 1995; O'Keefe, Brockopp, & Chew, 1986). There have been no specific studies that tie dating violence and sexual harassment together. However the AAUW Educational Foundation (1993), PCSW (1995), and Fineran and Bennett (1995) studies all had questions regarding the physical forms of sexual harassment, which include sexual assault. All three studies documented that 10 percent to 20 percent of the students experienced these behaviors and that girls experienced these behaviors more than boys. Unfortunately, the teenage dating violence literature and sexual harassment literature remain separate. Future research should incorporate questions from both areas to illuminate their relationship or identify a continuum of violence.

Fostering a positive school climate remains the primary approach to reducing peer sexual harassment. School administrators have the ability to implement programs that foster trust and respect among students who are together 30 hours or more per week. School social workers have the responsibility to advocate that students be educated in a more positive, nurturing environment. Formulating peer sexual harassment as both a hostile environment and mental health problem at the high school level allows changes to be made that can affect a student personally. However, accomplishing this task presents a challenge. School administrators have negotiated a variety of paths in their attempt to both understand the problem and then adequately address the issue.

School Policy and Implications

Cultural Theories

Defining a theoretical context in which to understand sexual harassment is difficult. Lee, Croninger, Linn, and Chen (1996) outlined four cultural theories of sexual harassment: (1) Freudian, (2) structural, (3) critical, and (4) ethical. How a school administrator chooses to view sexual harassment will influence the type of policy a school will develop to address this issue.

Freudian. In brief, the Freudian approach views sexual harassment as a failure of the culture to repress sexuality, resulting in a social breakdown and signaling a major threat to the social order. The existence of sexual harassment in schools is denied, as evidenced through teenage programs that promote "just say no" or abstinence programs that further deny the reality of teenage sexuality.

Structural. The structural approach addresses school norms and seeks to address sexual harassment through formal programs, such as the school's discipline code or a grievance procedure. Changing school norms may consist of decreasing the tolerance of school rituals such as hazing. The structural approach can be criticized for being too superficial and reactionary.

Critical. The critical approach looks at the abuse of power within the school culture and relates sexual harassment to violence and aggression in the larger society. Schools have the option of providing a less hostile climate where students and staff become involved in discussing issues of oppression and their alleviation. Detractors of the critical perspective see the school culture as a reflection of the larger society, where addressing oppression at the high school level is viewed as futile.

Ethical. An ethical approach contemplates the importance of shared values and ethical or moral concepts that bind members together as a community. Lee et al. (1996) stated that "those who support a cultural theory organized around ethical or moral concerns would see sexual harassment as a sign of the failure of existing organizations to instill ethical coherence and integrity in their members" (p. 389). This approach assumes that the schools take responsibility for teaching the basic tenets of democracy.

Examples

Keeping these four approaches to sexual harassment in mind, let us turn to some pragmatic examples of schools dealing with this issue. Stein (1995) pointed out that the arbitrary way in which educators deal with this problem is in itself problematic. One school district banned all physical touching because of numerous complaints from female students about being sexually assaulted by a football player. It would appear that the Freudian cultural approach is alive in school districts that prohibit physical contact as a remedy to sexual harassment complaints. Stein also pointed out that using the "school as courthouse" approach also may be questionable. Although demonstrating democratic ideals such as a "jury of one's peers," there is the problem of victim blaming by popular vote. A popular student accused of sexual harassment will frequently gain status as a victim, whereas the student who points the finger is blamed for provoking the behavior.

Another way of responding to sexual harassment involves the victims or targets writing letters to the perpetrators. This intervention can be viewed by the student as a therapeutic or empowering experience. However, this "one-on-one" encounter does not involve the number of students who may have witnessed the event and does not contribute to fostering a positive school environment. Although it may be a positive move to foster

mental health in the individual, it does not afford the possibility of addressing sexual harassment as a larger social issue in the school. The question of private trouble versus public issue is never raised. Many school officials try to maintain the privacy of the people involved, but frequently the rumors of the event, especially if witnessed by other students, may be worse.

Many schools have developed sexual harassment policies and procedures that legislate behavior and are more reactive than proactive. These policies place the burden on the student to file a complaint and face the response. This structural approach uses the victim-perpetrator model, which presents difficulties when the majority of students are both perpetrator and victim (AAUW Educational Foundation, 1993; Fineran & Bennett, 1995). Lee et al. (1996) stated that "it is difficult to think that a policy of punishing the perpetrator and protecting the victim will be effective in eliminating [peer] sexual harassment in schools" (p. 408).

For school administrators and school social workers, these arguments are important when considering school policy. Sexual harassment is a complex phenomenon that requires a complex response. Although there has been no tried and true way to deal with this problem in the kindergarten through 12 school setting, how this issue is framed is important. Sexual harassment has been identified as an abuse of power (MacKinnon, 1979). Lee et al. (1996) discussed the abuse of organizational power in which a power differential exists on the basis of a person's role (that is, teacher-student, supervisor-employee). The abuse of power theory responds well to a structural approach that defines a perpetrator-victim relationship. These circumstances could exist in a school environment in which school personnel are sexually harassing students; however, the majority of sexual harassment in schools is peer to peer and requires a different, less punitive response.

Lee et al. (1996) supported a cultural theory approach using the ethical dimensions where "more discussion of basic democratic values" is encouraged and "moral and ethical questions are hotly debated" (p. 409). Stein and Sjostrom (1994) believed that sexual harassment needs to be considered as "a matter of social injustice" and schools should promote democratic principles.

Conclusion

This review of sexual harassment policy is not at all exhaustive and serves only to highlight the complexity of this issue. School administrators need to use a number of responses that support a legal and democratic understanding of sexual harassment while ensuring that individual students are protected and a positive learning environment is encouraged. This is a particularly tall order because there is scant research on the efficacy of any of these approaches for administrators to rely on for guidance. Although some schools have instituted preventive training for sexual harassment, there are no longitudinal studies demonstrating the long-term effect of these workshops.

For most adolescents, the high school experience is critical to their personal development

and readiness to become part of the adult world. Peer sexual harassment interferes with and inhibits this important developmental process. Social workers who are able to clearly identify the problems associated with peer sexual harassment strengthen their positions as advocates for improved school environments, and perception of the problems allows them to define hostile school environments as a serious social problem with negative mental health and legal ramifications. In the past sexual harassment has been generally viewed as just "teasing" or "good-natured fun." This "typical adolescent behavior" needs to be reframed as behavior that hurts both boys and girls in the educational setting and continues the discrimination of women in society at large.

References

American Association of University Women Educational Foundation. (1992). How schools shortchange girls. Wellesley, MA: Wellesley College Center for Research on Women.

American Association of University Women Educational Foundation. (1993). Hostile hallways: The AA UW survey on sexual harassment in America's schools (Research Report 923012). Washington, DC: Harris/Scholastic Research.

Bergman, L. (1992). Dating violence among high school students. Social Work, 37, 21-27.

Civil Rights Act of 1964, Title VII, 42 U.S.C. [section] 2000e-2(a).

DeKeseredy, W. S., & Schwartz, M. (1994). Locating a history of some Canadian woman abuse in elementary and high school dating relationships. Humanity & Society, 18, 49-63.

Dziech, B.W., & Weiner, L. (1990). The lecherous professor: Sexual harassment on campus (2nd ed.). Urbana: University of Illinois Press.

Fineran, S., & Bennett, L. (1995, July). Gender differences in peer sexual harassment. Paper presented at the Fourth International Family Violence Research Conference, University of New Hampshire, Durham.

Fitzgerald, L. F., Shullman, S., Baily, N., Richards, M., Swecker, J., Gold, Y., Oremerod, A. J., & Weitzman, L. (1988). The incidence and dimensions of sexual harassment in academia and the workplace. Journal of Vocational Behavior, 32, 152-175.

Gutek, B. A. (1985). Sex and the workplace. San Francisco: Jossey-Bass.

Langelan, M. J. (1993). Back off. New York: Simon & Schuster.

Lee, V. E., Croninger, R. G., Linn, E., & Chen, X. (1996). The culture of sexual harassment in secondary schools. American Educational Research Journal, 33, 383-417.

MacKinnon, C. A. (1979). Sexual harassment o.f working women. New Haven, CT: Yale University Press.

Metha, A., & Nigg, J. (1983). Sexual harassment on campus: An institutional response. Journal of the National Association for Women Deans, Administrators and Counselors, 46, 9-15.

Molidar, C. E. (1995). Gender differences of psychological abuse in high school dating relationships. Child & Adolescent Social Work Journal, 12, 119-134.

O'Gorman, J., & Sandler, B. R. (1988). Peer harassment: Hassles for women on campus. Washington, DC: Association of American Colleges, Project on the Status and Education of Women.

O'Keefe, N. K., Brockopp, K., & Chew, E. (1986). Teen dating violence. Social Work, 31, 465-468.

Permanent Commission on the Status of Women. (1995). In our own backyard: Sexual harassment in Connecticut's public high schools. Hartford, CT: Author

Pryor, J. B., La Vite, C. M., & Stoller, L. M. (1993). A social psychological analysis of sexual harassment: The person/situation interaction. Journal of Vocational Behavior, 42, 68-83.

Stein, N. (1995). Sexual harassment in K-12 schools: The public performance of gendered violence. Harvard Educational Review: Special Issue on Violence and Youth, 65(2), 145-162.

Stein, N., Marshall, N. L., & Tropp, L. R. (1993). Secrets in public: Sexual harassment in our schools. Wellesley, MA: Wellesley College, Center for Research on Women.

Stein, N., & Sjostrom, L. (1994). Flirting or hurting? A teachers guide on student to student sexual harassment in schools. Washington, DC: National Education Association.

Strauss, S., & Espeland, P. (1992). Sexual harassment and teens. Minneapolis: Free Spirit.

Title IX, Education Amendments of 1972. Federal Register, Part II, Department of Education, 45, 30955-30965.

United States v. Virginia et al., 116 S. Ct. 2264, 135 L. Ed. 2d 73 (1996).

U.S. Equal Employment Opportunity Commission. (1980). Guidelines on discrimination because of sex. Federal Register, 45, 74676-74677.

U.S. Merit Systems Protection Board. (1981). Sexual harassment of federal workers: Is it a problem? Washington, DC: U.S. Government Printing Office.

U.S. Merit Systems Protection Board. (1987). Sexual harassment of federal workers: An update. Washington, DC: U.S. Government Printing Office.

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