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IS SEXUAL HARASSMENT RESEARCH BIASED?

Iddo Landau

During the last two decades sexual harassment has become an important concept in our moral and legal culture. One reads about it in the daily paper. Legal and moral philosophers write articles and books about it. There are sexual harassment laws, sexual harassment committees, organizational policies to combat sexual harassment, and educational seminars to heighten sensitivity to it. As with many other concepts in applied ethics, the legislation and claims concerning sexual harassment heavily rely on empirical research about it. This paper argues that the research on sexual harassment is biased by several feminist notions. Hence, researchers should try to be aware of, and overcome, the dynamics that may lead to such biases (e.g., referees' possible tendency to evaluate less favorably papers dealing with "touchy" issues, writers' preference not to discuss "problematic" themes, or the inclination to consciously or unconsciously ostracize those who do). Section 1 presents the notions I believe to have influenced the research. Section 2 points out the ways the research has been affected by them. Section 3 discusses possible objections, and section 4 the significance of these findings.

I

The terms 'feminist convictions', 'feminist notions', or 'tendencies in feminist thought' are, of course, highly problematic. Feminist theory is not a simple, unified construct, but rather a highly variegated and complex body of views, theories and intellectual traditions reacting to each other. There are many varieties even within the feminist intellectual traditions themselves. Thus, the use of the terms 'feminist convictions' or 'tendencies in feminist thought' here does not presuppose that these convictions or notions are espoused by all feminist thinkers, only that they are familiar in feminist thought and are accepted by a significant body of feminist thinkers.

I believe the following tendencies in feminist thought to have influenced sexual harassment research:

- (a) An inclination to see power, hegemony, domination, or will to oppress others as major motivations behind various social phenomena, especially those involving relations between men and women. Hence, a tendency to explain many social phenomena by reference to these motivations, even phenomena not commonly deemed related to these motivations.¹
- (b) An emphasis on the oppression of women. Women are seen as oppressed in ways which are commonly unrecognized, and to degrees habitually unacknowledged. The oppression is deeper, and more serious, than is usually considered.²
- (c) An inclination to see women as generally good and non-aggressive, and men as bad and aggressive. Men are taken to be the instigators of women's suffering, and their activities are to be viewed with caution, even suspicion.³
- (d) A tendency to stress the differences between men and women, and to see 'women' and 'men' (rather than, e.g., races, economic classes, nations, or psychological states) as the central categories for interpreting many phenomena.⁴
- (e) A propensity to explain away or play down possible differences between feminists on the one hand, and women in general on the other. Feminists are seen as linked to, and representing, women's real views or interests.⁵

This does not aim to be an exhaustive or representative list of notions or tendencies in feminist research. Included in it are only those which I believe to have biased sexual harassment research. These notions are, generally, more typical of feminists considered by themselves or by others as radical feminists (such as Shulamith Firestone, Mary Daly, Kate Millett, Marilyn French, or Catherine MacKinnon), and less or hardly typical of those considered as liberal feminists (such as Betty Friedan, Janet Radcliffe Richards, or Bella Abzug). This should not be taken to suggest, of course, that all radical feminists subscribe to all of these notions, or subscribe to them in the same way or to the same degree; or that all liberal feminists reject these notions completely or to the same degree. It only means that they are relatively prevalent in the writings of many radical feminist authors, and tend to be uncommon in those of liberal feminists. They are characteristic to different degrees of other schools in feminist thought, such as socialist, ecological, cultural, or Marxist feminisms.⁶

II

In their 1988 "Academic Harassment" Fitzgerald et al. write that "[A]lthough numerous studies have appeared attempting to document the nature and frequency of sexually harassing behaviors as reported by the recipients of those behaviors . . . and at least one report has described workplace harassers from the victims' perspective . . . no study has yet examined harassers directly."⁷ The situation has not improved much since the publication of this study, as is evident in, among others, the scarcity of discussions on the percentage of men who harass. Is it a small minority of ten percent of men who pester all harassed women, or a large minority of forty five percent, or a majority of ninety percent?⁸ I suggest that the relative scarcity of inquiry on this issue is not coincidental. It is related to the wish to avoid complicating the notion that men as a group are hostile to women, and the notion that the relations between men and women are very frequently motivated, and should be explained in reference to, men's will to dominate women.

Various studies indicate that violence is a prevalent and serious phenomenon in lesbian relationships, perhaps as serious and prevalent as in heterosexual ones.⁹ However, it is difficult to find studies that examine sexual harassment among lesbians, or even among women in general.¹⁰ I suggest that research on this topic is scarce since, should the percentage of lesbian sexual harassment prove to be on a par with the heterosexual kind, the notion that men are aggressive and domineering while women are not would be put to question. The same would be true for the stress on the differences between men and women, and the tendency to see women and men as the central categories for interpreting phenomena. The avoidance of this issue may be related also to the more specific propensity of some feminist scholars to see lesbians as the *avant-garde* of feminism.¹¹ From this respect, too, it might prove uncomfortable to elaborate on sexual harassment within this community, or to compare its percentage to that among heterosexuals.

It is also difficult to find research on whether women who belong to traditionally disadvantaged ethnicities are sexually harassed more than women who belong to traditionally advantaged ones (e.g., whether in the United States Hispanic women are harassed more than white women); whether men from traditionally advantaged ethnicities harass more than men from disadvantaged ones; or whether the most frequent and serious type of harassment is that in which men of traditionally advantaged ethnicities harass women of traditionally disadvantaged ones. Research on these questions may complicate the notions that power is the determining feature of sexual harassment, and that women and men (rather

than, e.g., economic classes, ethnicities, or races) should be seen as the central categories for interpreting phenomena. Similarly, there are hardly any studies that examine whether attractive women are harassed more than unattractive ones. Here too research may complicate the notion that men's behavior towards women is principally motivated by the former's will to hegemony over the latter. It may suggest that some of the behaviors in question are motivated not by a wish to dominate but involve mere sexual attraction, clumsily communicated courtship, and misunderstanding. The same is true for inquiries whether single and divorced women are harassed more than married ones.

In my teaching career I have encountered three cases in which I wondered whether I have been offered sexual bribery by women students. All three involved requests to improve a low mark or to accept an overdue paper. The proposals, if they were such, were ambiguously phrased, all of them including the word "everything" (e.g., "I am ready to do everything for . . ."). By "everything" the students may have simply meant scholarly chores (such as writing a longer paper), or sexual activity. Deciding this issue depends, among others, on the type of clothes worn, body language, and the way the sentence was uttered, especially the word "everything." To this day I am not completely sure how these three suggestions should have been interpreted. Discussions with some other male professors revealed that I am not the only one who has been exposed to such experiences. However, inquiries into cases in which women are the initiators of sexual bribes, even of proposals which are not actualized, are rare.¹² It is difficult to find studies that examine the percentage of employers, managers, or professors who have been offered sexual bribes, or the percentage of women students or employees who have made such proposals, have heard of other women who had done so, or are ready to do so under certain circumstances. It is also hard to find studies that examine women employees' and students' perceptions of such proposals (from "very severe" to "no big deal"). The scarcity of discussions on this issue does not seem coincidental either; research on it may complicate the notion that men are evil wrongdoers, and of women are mere victims.

It is also difficult to find studies that examine the percentage of women who *enjoy* sexual innuendo, jokes which carry sexual connotations, or persistent requests for dates, and wish these behaviors to continue uncurtailed. This lacuna too is related to the inclination to present sexual harassment as prevalent and serious as possible, which is related to the tendency to emphasize women's oppression, to see men as bad and aggressive, and to explain away, or play down, possible differences between feminists' and women's perceptions and views.

In their 1992 "Individual Difference Correlates of the Experience of Sexual Harassment among Female University Students," Azy Barak et al. write that "despite the presumed centrality of personality factors to attention to and perception of sexual harassment . . . existing research on this topic is meager, the few findings that do exist are often contradictory, and conceptualizations regarding the relation of personality differences and attention to and perception of sexual harassment have not been well articulated."¹³ Although the situation has improved a bit since 1992, and it is now easier to find works on personality differences in perceptions of sexual harassment than on other neglected questions surveyed here, Barak's et al. claim is still by and large correct.¹⁴ It is even harder to find studies that examine ethnicity and social class differences in perceptions of sexual harassment. Are there differences in perceptions of behaviors such as sexual joking, sexual innuendo, or persistent requests for dates between, e.g., a Mexican migrant worker in southern California, a well-off white Protestant Bostonian, and a first generation Chinese woman in New York?¹⁵ Another largely unexamined category of difference is ideological affiliation with feminism. Do women who identify themselves as feminists perceive behaviors differently than women who do not identify themselves as such?¹⁶ The scarcity of examinations of differences in various groups' perceptions of sexual harassment is all the more conspicuous when compared to the frequency of discussions on the differences between women and men. This scarcity, too, seems to be related to the tendency to play down, or explain away, possible differences between feminists on the one hand, and women in general on the other, as well as to the tendency to see women and men (rather than, e.g., economic classes or ethnic groups) as the central categories for explaining phenomena. It is related also to a specific legal issue, i.e., whether courts should employ the 'reasonable woman' criterion, differing from the 'reasonable person' criterion, when judging which behaviors constitute sexual harassment. Many feminists support the adoption of the former criterion, which might be jeopardized by discussions on the extent of differences in women's perceptions of sexual harassment.¹⁷ The relative lack of discussions on differences between women may be related to another specific inclination in the research, i.e., the wish to present the aversion to activities seen as sexual harassment by feminists as consensual among women.

The place of misunderstanding in sexual harassment is another issue neglected in research. To what extent do cases of sexual harassment arise from misunderstanding, and to what from malevolence or other sources?¹⁸ The issue is important both for the understanding of the phenomenon of sexual harassment and for deciding on the practical strategies

that should be adopted to combat it (e.g., explanatory measures vs. punishment). It is relevant also for philosophical discussions of sexual harassment such as Mane Hajdin's, who argues that present definitions are unhelpful since they do not enable men to know in advance which of their behaviors sexually harass.¹⁹ Discussions of this question, however, may complicate the notion that the will to dominate is the major motivation behind social phenomena (especially those involving relations between women and men), as well as the notion that men are generally bad and aggressive.

Thus, some questions are hardly asked in sexual harassment research, and hence some answers are hardly answered. This presents what may very well be a slanted picture of the phenomenon; it is insensitive to differences between women of different groups, to the pleasure some women might derive from some activities labeled as sexual harassment, to some women's own perceptions of sexual harassment, to the proportion of men who harass, or to their motivations when they do so. This slanted picture affects not only our understanding of the phenomenon of sexual harassment, but also the administrative, political, and legal measures we choose in order to deal with it.

III

It may be objected that the argument presented in this paper presupposes that the conclusions of the research on under-discussed issues will conflict with feminist convictions, and that feminist theory would not be able to contend with these conclusions. But both presuppositions, it may be objected, are highly problematic. It is not at all clear, for example, that research would find the proportion of sexual harassment among lesbians to be on par with that among heterosexuals. But even if it would, this could be answered by saying that these behaviors are influenced by masculine behavior. Similarly, it is not at all clear that research would find that attractive women are harassed more than others. But even if it does, feminist scholars may still be able to defend the notion that men's power over women is the determining factor of sexual harassments by claiming that sexual attractiveness is itself determined by men-women power relations. They may maintain along somewhat Naomi Wolfian lines that women's sexual attractiveness is related to images of women's weakness: young age has to do with inexperience; a small waist with hunger and fragility; big eyes with questioning and insecurity; etc.²⁰

However, the argument presented in this paper does not rest on the presuppositions that research would produce results which will "embarrass"

feminist notions, or that feminist scholarship will not be able to cope with such “embarrassments.” The argument does not commit itself to any supposition concerning the outcomes of research. It presupposes only that the *danger* of an outcome that conflicts with one’s convictions is sufficient to consciously or unconsciously guide many researchers to avoid “touchy” issues. The tendency to avoid problematic issues can show itself even if they merely complicate accepted notions, or only carry the risk of complicating them.

Another possible objection may be that the argument presupposes that the feminist notions outlined above are incorrect, while this incorrectness has not been proven. However, the argument does not presuppose that these notions are incorrect, only that the fear that they might turn out to be so is sufficient to influence some researchers to avoid certain issues, and that their correctness, like that of any other notion, should be examined. One way of doing this is to pose certain questions, and investigate certain empirical issues which at present, at least in sexual harassment research, remain largely unexplored.

Another objection may be that the argument presupposes that most scholars who conduct research on sexual harassment are feminists. However, the argument does not rest on this supposition. It points out a group of questions that remain largely unasked, and suggests that the most plausible explanation for this fact is the influence of some feminist notions on sexual harassment researchers. Thus, it does not *presuppose* that many sexual harassment researchers have been influenced by feminist notions, but *concludes* that they are.

But could not this scarcity of discussion on certain issues be explained in other ways? It might be suggested, for example, that the issues mentioned above have been under-researched because of mere technical problems, such that researching them costs too much money, or involves unwilling respondents, or that there are no reliable research methods that could yield dependable conclusions about these issues. How could the percentage of the men who harass be reliably estimated? And can we trust men who claim that there has been a misunderstanding, and they did not know they were sexually harassing?²¹ Or can we trust men who claim that they have been offered sexual bribery by women employees or students?

However, some of these problems arise also for issues that have been extensively investigated in sexual harassment research. It is not clear, for example, that women respondents should be considered more trustworthy than men respondents, and that estimates concerning women are more trustworthy than estimates concerning men. Moreover, although researching some of the under-represented issues does require sophisticated

research strategies, in most cases the investigation would be rather straightforward, and require the same methods that are employed for the frequently studied questions in sexual harassment research. This is true, for example, for the issues of the percentage of women who *enjoy* various sexual behaviors, of sexual harassment among lesbians, the extent of institutional power inequality between harasser and harassed, or the relation between group membership and perceptions of sexual harassment. (Some of these issues would have been especially easy to research: they involve merely adding a few more lines to existing questionnaires.)

Another suggestion may be that the scarcity of discussion on the issues mentioned above is due merely to the early stages sexual harassment research is still in; there has simply not been enough time to investigate all questions related to this phenomenon. Or it may be suggested that issues are under-represented because of mere coincidence or innocent negligence; these issues simply did not occur to researchers. However, the large volume of work on the topic, on the one hand, and the scarcity of discussion on issues which have so much in common, on the other, make the 'early stages', 'coincidence', and 'mere negligence' explanations too facile. Too many scholars have written too many articles for too long a span of time on sexual harassment for these explanations to be accepted. The research on sexual harassment is about two decades old, and one could expect that in the hundreds of papers published on it the issues suggested here would arise more often.

The infrequency of discussion on these topics could be explained also by reference to the relative rareness of the phenomena they deal with. For example, it may be argued that although some women enjoy several of the behaviors other women perceive as sexual harassment, their number is surely small. Similarly, although there are cases of sexual harassment among lesbians, their percentage, or at least absolute number, is surely less than that of women harassed by men. Thus, the low proportion of studies which deal with such issues is understandable.²² However, although phenomena such as those mentioned above should perhaps be studied less commonly than those of greater frequency, the research should not be as scant as it is now. Relative infrequency may justify a lesser proportion of work, but not an almost complete disregard. Moreover, the phenomena mentioned above may turn out to be much more common than is assumed. It is precisely for this reason that more thorough investigation is required. According to contemporary research, the extent and seriousness of men-women harassment remained for a long time underestimated. The research on the phenomena mentioned above may still be in the state that research on men-women sexual harassment used to be.

It may be claimed also that if an issue has already been discussed—even of only in a few academic works—it can be seen as satisfactorily “covered,” and there is no need to discuss it further. Thus, for example, it may be argued that after Fitzgerald et al. found in one study that male professors who claim they have been sexually harassed by students are themselves prone to sexually harass, there is no need in further study of this phenomenon.²³ Similarly, it may be suggested that once Pryor has studied male harassers, there is no need to consider their percentage and behavior more deeply.²⁴ However, according to the logic of this argument it would have also been sufficient to devote only a small number of studies to the widely discussed issues in sexual harassment research, such as the incidence of men-women sexual harassments, or the perceptions of sexually harassing behaviors among women. In experimental studies a conclusion is accepted as (tentatively) correct only after it is confirmed many times in different settings and by different researchers. Many empirical researches contradict others. For example, while Mazer and Percival have not found any support for “the idea that the reporting of sexual harassment experience is a function of . . . ideological belief,” Schneider concludes that the latter does have a bearing on the former.²⁵ Likewise, while York has not found any evidence for the view that women and men differ in their perceptions of sexual harassment, Pryor concludes that they do.²⁶ Thus, only several studies on a certain topic cannot be taken as satisfactorily “covering” it. It is also noteworthy that papers researching under-represented issues are rarely cited in other articles, and thus are by and large “lost” for the general discussion of sexual harassment.

It may be also objected that there may be other topics scarcely or never discussed, but unrelated to the feminist notions mentioned above. However, the existence of such topics does not confute the argument. Other under-discussed issues do not show that those presented in this paper are unrelated to the feminist notions mentioned above; they only show that other ideological biases, technical problems, negligence, or unidentified causes also influence the under-representation of other issues. But this has no bearing on the present argument.

IV

The argument of this paper is similar in structure and conclusions to many of those presented in feminist thought. There too a group of rarely discussed issues (usually related to women, or to women’s liberation) is identified, and it is argued that the inadequate discussion is most plausibly explained by the convictions many of the researchers hold (usually

the androcentric notions adopted by many of the male researchers). There too efforts are sometimes made to excuse the poverty of research on some issues by negligence, coincidence, early stages of the research, and similar explanations, and there too such explanations are frequently unconvincing. Thus, the types of criticism that feminist theorists direct at non-feminist research seem to apply to feminist research as well. It too is sometimes blind to itself and to its own faults, is closed to other outlooks, and is inattentive to ideologically uncomfortable questions in ways comparable to those which, according to feminist analyses, non-feminist research is.

Various feminist philosophers of social science have characterized feminist social research as different from non-feminist research in a number of ways. Liz Stanley and Sue Wise, for example, take feminist research to “reject the scientist/person dichotomy” and “dismantle the power relationship which exists between researcher and researched.”²⁷ Likewise, Sandra Harding takes it to “provide an understanding of . . . social life that transcends gender loyalties and does not substitute one gender-loyal understanding for another.”²⁸ Joyce McCarl Nielsen discusses the ability for a ‘double vision’, i.e., a capability of members of disadvantaged groups to understand both their own world view and that of the advantaged classes.²⁹ And Fonow and Cook characterize feminist research by the tendency “to reflect upon, examine critically, and explore analytically the nature of the research process.”³⁰ Many, such as Harding or Mary Evans, characterize feminist research as introducing a paradigm shift into social science research.³¹ However, the bias in sexual harassment research suggests that, at least in this sphere, these hopes or characterizations have not been fully realized. Many sexual harassment researchers do not transcend gender loyalties, are numb to the perspectives of those they consider members of the advantaged groups, and do not critically examine and analytically explore the nature of their research process. At least in these ways, the hope for a paradigm shift has not been realized in sexual harassment research, which seems plagued by many of the problems that affect social science in general.

Beside these theoretical implications, the bias in sexual harassment research has some practical implications. It suggests that courts, legislators, and policy makers should be somewhat cautious when relying on the conclusions of sexual harassment research. The picture they receive may be slanted because some relevant questions have not been raised. The bias also calls on researchers to be more conscious of dynamics that may adversely influence contemporary sexual harassment research. If researchers feel that journal referees are less willing to evaluate favorably papers dealing with “touchy” issues, referees and

journal editors should be more aware of this inclination. If there is a tendency to consciously or unconsciously ostracize those who deal with “forbidden” issues, then the research community should be more aware of this tendency, and keep it under check. And if researchers avoid certain questions since they feel uncomfortable with them, or are afraid of touching “problematic” issues, they should be aware of these dynamics and try to overcome them.*

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NOTES

1. For some examples of this inclination see, e.g., Kate Millett, *Sexual Politics* (London: Rupert Hart-Davis, 1969), chap. 2; Naomi Wolf, *The Beauty Myth: How Images of Beauty Are Used Against Women* (New York: Morrow, 1991); Adrienne Rich, *Of Woman Born* (New York: Bantam, 1977), chap. 3; Dale Spender, *Man-Made Language* (London: Routledge, 1985); Pat Mainard, “The Politics of Housework,” in Ellen Malos, ed., *The Politics of Housework* (London: Allison and Busby, 1980), pp. 99-104.

2. See, e.g., “Redstockings Manifesto,” in Leslie B. Tanner, ed., *Voices from Women’s Liberation* (New York: Signet, 1970), pp. 109-11; Diana Pearce, “The Feminization of Poverty: Women, Work and Welfare,” in Rochelle Lefkowitz and Ann Withorn, eds., *For Crying Out Loud* (New York: Pilgrim, 1986), pp. 29-46; Janie Whyld, “School Life: Organization and Control,” in Janie Whyld, ed., *Sexism in the Secondary Curriculum* (London: Harper and Row, 1983), pp. 28-45; Adrienne Rich, *Of Women Born*, (New York: Bantam, 1977), chaps. 7, 10.

3. See, e.g., Mary Daly, *Gen/Ecology: The Metaethics of Radical Feminism* (Boston: Beacon, 1973); Susan Griffin, *Woman and Nature: The Roaring Inside Her* (London: Women’s Press, 1984); Andrea Dworkin, *Woman Hating* (New York: Dutton, 1974); New York Radical Feminists, “Politics of the Ego: A Manifesto of for New York Radical Feminists,” in Anne Kodedt, Ellen Levine, and Anita Rapone, eds., *Radical Feminism* (New York: Quadrangle Books, 1973), p. 380; Susan Brownmiller, *Against Our Will* (New York: Bantam, 1975), pp. 4-5.

4. See, e.g., Marilyn French, *Beyond Power: On Women, Men and Morals* (New York: Summit Books, 1985); Andrée Collard with Joyce Contrucci, *Rape of the Wild: Man’s Violence against Animals and Earth* (London: Women’s Press, 1988); Shulamith Firestone, *The Dialectic of Sex* (London: Women’s Press, 1979), chap. 1; Karen Armstrong, *The Gospel According to Woman: Christianity’s Creation of the Sex War in the West* (Garden City, NY: Doubleday, 1987); Roxanne Dunbar, “Female Liberation as the Basis for Social Revolution,” in Robin Morgan, ed., *Sisterhood is Powerful* (New York: Vintage, 1970), pp. 477-92.

5. For some examples and discussions of this tendency see, e.g., New York Radical Women, "Principles," in Morgan, *Sisterhood is Powerful*, p. 520; Robyn Rowland, "Introduction," in *Women Who Do and Women Who Don't Join the Women's Movement* (London: Routledge, 1984), pp. 17, 20; Naomi Wolf, *Fire With Fire: The New Female Power and How It Will Change the 21st Century* (London: Vintage, 1994), pp. 65-66; Marilyn Friedman, "'They Lived Happily Ever After': Sommers on Women and Marriage," *Journal of Social Philosophy* 21 (1990): 60; Alison M. Jaggar, *Feminist Politics and Human Nature* (Totowa, NJ: Rowman and Allanheld, 1983), pp. 149, 382-83.

6. For characterizations of these and other schools in feminist thought see, e.g., Rosemarie Tong, *Feminist Thought: A Comprehensive Introduction*, 2nd ed. (Boulder, Colorado: Westview, 1998); Judith Evans, *Feminist Theory Today* (London: Sage, 1995); Patricia Ticineto Clough, *Feminist Thought: Desire, Power, and Academic Discourse* (Oxford: Blackwell, 1994); Eve Browning Cole, "Feminist Philosophy in New Directions," in her *Philosophy and Feminist Criticism: An Introduction* (New York: Paragon, 1993), pp. 24-50; and Valerie Bryson, *Feminist Political Theory: An Introduction* (London: Macmillan, 1992).

7. Louise F. Fitzgerald, Lauren M. Weitzman, Yael Gold, and Mimi Ormerod, "Academic Harassment: Sex and Denial in Scholarly Garb," *Psychology of Women Quarterly* 12 (1988): 330.

8. For two exceptions see Fitzgerald et al., "Academic Harassment"; John B. Pryor: "Sexual Harassment Proclivities in Men," *Sex Roles* 17 (1987): 269-90.

9. See, e.g., Claire M. Renzetti, "Violence in Lesbian Relationships: A Preliminary Analysis of Causal Factors," *Journal of Interpersonal Violence* 3 (1988): 381-99; Gwat-Yong Lie and Sabrina Gentlewarrier, "Intimate Violence in Lesbian Relationships: Discussion of Survey Findings and Practice Implications," *Journal of Social Service Research* 15 (1991): 41-59.

10. For an exception see Beth E. Schneider, "Consciousness About Sexual Harassment Among Heterosexual and Lesbian Women Workers," *Journal of Social Issues* 38 (1982): 85, 96.

11. See, e.g., Charlotte Bunch, "Not for Lesbians Only," *Quest* 2 (1975): 50-56.

12. For a study that does examine this issue see Fitzgerald et al., "Academic Harassment."

13. Azy Barak, William A. Fisher, and Sandra Houston, "Individual Difference Correlates of the Experience of Sexual Harassment among Female University Students," *Journal of Applied Social Psychology* 22 (1992): 20-21.

14. For some exceptions see Natalie J. Malovich and Jayne E. Stake, "Sexual Harassment on Campus: Individual Differences in Attitudes and Beliefs," *Psychology of Women Quarterly* 14 (1990): 63-81; Audrey J. Murrell and Beth L. Dietz-Uhler, "Gender Identity and Adversarial Sexual Beliefs as Predictors of Attitudes Toward Sexual Harassment," *Psychology of Women Quarterly* 17 (1993): 169-75.

15. Although there is no consensus on whether rape should be seen as a form of sexual harassment, it is instructive to note in this context Gloria J. Fischer's conclusion that there are differences between Hispanic and white women's attitudes towards date rape, as there are even between bilingual and non-bilingual Hispanic women. See Gloria J. Fischer, "Hispanic and Majority Student Attitudes Toward Forcible Date Rape as Function of Differences in Attitudes Toward Women," *Sex Roles* 17 (1987): 93-101.

16. For some exceptions see Schneider, "Consciousness About Sexual Harassment Among Heterosexual and Lesbian Women Workers," 89; John B. Pryor and J. D. Day, unpublished study, University of Notre Dame, 1984, described in John B. Pryor, "The Lay Person's Understanding of Sexual Harassment," *Sex Roles* 13 (1985): 276; Donald B. Mazer and Elizabeth F. Percival, "Ideology of Experience? The Relationship Among Perceptions, Attitudes, and Experiences of Sexual Harassment in University Students," *Sex Roles* 13 (1989): 135-47.

17. The 'reasonable woman' criterion was indeed adopted in the United States in, e.g., *Ellison v. Brady*, 924 F.2d 872 (9th Cir. 1991).

18. For three exceptions see Louise F. Fitzgerald and Lauren M. Weitzman, "Men Who Harass: Speculation and Data," in Michele A. Paludi, ed., *Ivory Power: Sexual Harassment on Campus* (Albany, NY: SUNY Press, 1990), pp. 125-40; Sue Rosenberg Zalk, "Men in the Academy: A Psychological Profile of Harassment," *ibid.*, pp. 141-75; and Pryor, "Sexual Harassment Proclivities in Men" (n. 8 above).

19. Mane Hajdin, "Sexual Harassment in the Law: The Demarcation Problem," *Journal of Social Philosophy* 25 (1994): 102-22.

20. Cf. Wolf, *The Beauty Myth* (n. 1 above).

21. For strategies envisaged to overcome this methodological problem see Pryor, "Sexual Harassment Proclivities in Men."

22. Some scholars even believe that the research that has been done on some of the issues mentioned here is too *wide* in proportion to their prevalence. See, e.g., Fitzgerald and Weitzman, "Men Who Harass: Speculation and Data," p. 125.

23. Fitzgerald et al., "Academic Harassment" (n. 7 above), p. 336. (Fitzgerald et al. do not suggest that the phenomenon should not be studied further.)

24. Pryor: "Sexual Harassment Proclivities in Men." (Pryor does not suggest that there should be no further research.)

25. Mazer and Percival, "Ideology of Experience?" (n. 16 above), p. 144; Schneider, "Consciousness About Sexual Harassment Among Heterosexual and Lesbian Women Workers" (n. 10 above), p. 89.

26. Kenneth M. York, "Defining Sexual Harassment in Workplaces: A Policy Capturing Approach," *Academy of Management Journal* 32 (1989): 844; Pryor, "The Lay Person's Understanding of Sexual Harassment" (n. 16 above). Most contemporary research supports the latter conclusion.

27. Liz Stanley and Sue Wise, "'Back into the Personal'; or, Our Attempt to Construct 'Feminist Research,'" in Gloria Bowles and Renate Duelli Klein, *Theories of Women Studies* (London: Routledge, 1983), p. 195.

28. Sandra Harding, "The Instability of the Analytical Categories of Feminist Theory," in Sandra Harding and Jean F. O'Barr, eds., *Sex and Scientific Inquiry* (Chicago: University of Chicago Press, 1987), p. 292.

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