

Sex, Power, and Dominance: The Evolutionary Psychology of Sexual Harassment

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Among the effects of sexual integration of the workplace has been an increase in the opportunities for, and incidence of, sexual harassment. Sexual harassment, and women's responses to it, can be understood as reflections of the different evolved sexual psychologies of the sexes. Among the issues discussed are whether the abusiveness of work environments should be viewed from the perspective of the 'reasonable person' or the 'reasonable woman,' whether sexual harassment is really 'about power' rather than about sex, and whether harassment that takes a sexual form is necessarily 'because of' the sex of the victim. Copyright © 2006 John Wiley & Sons, Ltd.

INTRODUCTION

One of the signal consequences of the dramatic change in women's participation in the labor force is that women now work side-by-side with men and compete for status with men in the same hierarchies (Browne, 2002). The results of workplace integration have not always been as some hoped, however, because men and women turn out not to be simply interchangeable. For example, despite the assumption that prohibitions of discrimination would lead to economic parity between the sexes, men tend—for reasons traceable to our evolutionary heritage—to engage in behaviors that cause them to earn more money than women and lead them to occupy the highest organizational positions at disproportionate rates (Browne, 1998; Kanazawa, 2005). Although men and women have somewhat different occupational

preferences (Browne, 2005), there is far more mixing of men and women than in the past. One effect of the breakdown of the sexual division of labor is the expansion of opportunities for sexual conflict to occur in the workplace. Much of this conflict is today labeled 'sexual harassment' (Browne, 1997).

The subject of sexual harassment often excites controversy, in part because it can be viewed through a variety of lenses. Some see sexual harassment as a tool of patriarchy (Zalk, 1990), while others view it as a mostly harmless form of interaction (Rich, 1981). The difficulty is that the label has been applied to such a diversity of conduct that its meaning has been substantially diluted. Courts have declared that all of the following kinds of conduct may constitute sexual harassment: forcible rape; extorting sex for job benefits; sexual or romantic overtures; sexual jokes; sexually suggestive pictures or cartoons; sexist comments; vulgar language; harassing actions of a non-sexual form; and even 'well-intended compliments' (Browne, 1997).

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The potpourri of conduct that can be labeled sexual harassment—conduct having a wide array of motivations and effects—makes it impossible to develop a unitary view of its causes and, necessarily, of its cures. It is no wonder that estimates of the incidence of sexual harassment vary so widely (Arvey and Cavanaugh, 1995; Gutek *et al.*, 2004). Thus, while some assert that 90% of all women have faced some form of sexual harassment in the workplace (Terpstra and Baker, 1986), surveys reveal that most women do not think that it is a problem in their own workplaces (Gutek, 1985; Bowman, 1999). Because the incidence of harassment declines as its severity increases, there is little meaning to be drawn from such statements as ‘approximately 50% of female students have been harassed in some way by their professors or instructors, ranging from insulting remarks, come-ons, propositions, bribes, and threats to outright sexual assault’ (Fitzgerald, 1993, p. 1071). A label encompassing behavior ranging from insulting remarks to rape is largely devoid of any explanatory power.

There are some patterns of behavior that recur, however. The purpose of this article is to examine the phenomenon (or perhaps more accurately, the phenomena) of sexual harassment through the lens of evolutionary psychology, a perspective that makes better sense of this constellation of behavior than its purely sociocultural competitors. The better one understands socially undesirable conduct, after all, the better armed one is to deal with it.

THE VARIETIES OF SEXUAL HARASSMENT

Sexual harassment is defined as a form of sex discrimination under the laws of the US (Browne, 1997), the UK (Kelly, 2000), and the European Union (Defeis, 2004). Two relatively distinct categories of sexual harassment have been identified in the literature and the case law. The first, known as ‘quid pro quo harassment’, is perhaps the archetypal form. It involves a claim that an employee was required to submit to sexual advances as a condition of either obtaining a benefit, such as being promoted, or avoiding a burden, such as being fired. The threat ‘sleep with me or you’re fired’ is a classic case, although courts may find a threat implicit in less direct language.

The rationale for viewing such conduct as sex discrimination, as opposed to simply obnoxious behavior, is that the sexual demand would not have been made had the employee been of the other sex. The case of the bisexual supervisor who imposes sexual demands on male and female employees alike was a mere hypothetical challenge to this rationale until a federal court of appeals was faced with just such a case and ruled that a supervisor who had imposed sexual demands on a husband and wife had not engaged in unlawful sexual harassment because it was not ‘discriminatory’ harassment (*Holman v. Indiana*, 2000).

The second form of harassment is ‘hostile environment’ harassment. It involves a claim that the work environment is permeated with sexuality or ‘discriminatory intimidation, ridicule, and insult’ (*Meritor Savings Bank v. Vinson*, 1986). A complaining employee must show that she (or he) was subjected to ‘unwelcome’ conduct, based upon sex, that was ‘sufficiently severe or pervasive to alter the conditions of the victim’s employment and create an abusive working environment’. The ‘severe or pervasive’ requirement is intended to preclude liability for isolated instances or comments that are ‘merely offensive’. The complainant must also show not only that she perceived the environment to be abusive but also that a hypothetical ‘reasonable person’ or ‘reasonable woman’ (more about this distinction later) would have found it so as well, in order to avoid holding employers liable for the hypersensitivity of their employees.

Hostile-environment harassment consists of a more diverse range of behaviors than quid pro quo harassment. A hostile environment can be created by sexual advances that are not tied to tangible aspects of the job, which might come from supervisors, co-workers, or even subordinates or customers. These cases are perceived as discrimination for the same reason that quid pro quo cases are, namely that the advances were ‘because of’ the target’s sex. Other cases may involve harassment of either a sexual or nonsexual form that is directed at a woman because of either sexual desire or hostility to her sex, so they also fit easily within a discrimination rationale. Other hostile-environment cases are not so easily fit into the discrimination model, however. Many cases involve complaints that the work atmosphere is generally ‘sexualized’—filled with sexually

provocative pictures, sexual jokes, sexist comments, and the like. Unlike quid pro quo cases, there may be no intended 'target' of this harassment at all, and the sexualized atmosphere may have predated the entry of women into that particular workplace. A plaintiff in such a case is not saying that she was treated differently because of her sex but rather that the environment is discriminatory because sexualized environments are inherently more oppressive to women than to men.

This article will examine three sexual-harassment issues that have been either erroneously or incompletely analyzed because of failure to consider the findings of evolutionary psychology. The first is whether the hostility of an environment should be judged from the perspective of the 'reasonable person' or from that of the 'reasonable woman' (in that large portion of cases in which the woman is the complainant). A perspective that takes seriously the notion that humans are products of natural selection, with the attendant differences in selective pressures that inevitably operate on males and females, suggests that when it comes to matters of sex, there is no such thing as a 'reasonable person', only 'reasonable men' and 'reasonable women'. Taking an average and constructing a 'reasonable androgyne' is simply not a meaningful option (Tiger, 1997).

The second issue involves the frequently repeated, but seldom examined, assertion that sexual harassment is 'not about sex but about power'. Under this view, in quid pro quo cases, men are using sex instrumentally in order to obtain and retain power over women. An evolutionary perspective does not deny the linkage between power and sex but suggests that the direction of causation is misperceived. Rather than men using sex to obtain power, it is much more accurate to say that they use power to obtain sex.

The final issue is the accuracy of the assumption that abuse that takes a sexual form, such as sexual epithets or hazing that has sexual overtones, is necessarily directed at the target 'because of sex'. Even prior to entry of women into the work force, men targeted such conduct against each other. When the goal is either to offend or to test a person, the actor is likely to select a form of conduct to which he believes the target will be especially sensitive. For both women and men, the conduct is likely to have sexual overtones. In many of these cases, it would not be inappropriate to say

that this conduct really is 'about power'—in the sense of being related to men's attempt to achieve status and dominance generally—rather than sex, but these cases are often assumed to be inherently more sexual than they actually are.

THE EVOLUTIONARY ORIGINS OF SEX DIFFERENCES IN SEXUAL PSYCHOLOGY

The principle of natural selection is often referred to as 'survival of the fittest', but this characterization places undue emphasis on survival, when in fact the key to fitness is reproduction. Natural selection favors those traits that enhance the organism's ability to overcome obstacles and avoid dangers, thereby getting its genes into the next generation. Many of the obstacles are the same for both sexes, who must obtain sufficient food and water, be protected from extremes of temperature, and avoid predators. When it comes to mating, however, members of the two sexes face quite different problems, which has resulted in not just physical but also psychological divergence.

The key to the difference between male and female natures is found in the concept of relative parental investment. As demonstrated by Trivers (1972), when the sexes differ in the minimum parental investment necessary for offspring to survive and reproduce, as they do quite strikingly in mammals, members of the sex investing less will compete for sexual access to members of the higher-investing sex. Unlike members of the more-investing sex, members of the sex investing less can increase their reproductive success through multiple partners. In most mammals, the lack of male parental investment leads males to compete among themselves either through attempts to make themselves attractive to 'choosy' females or through more direct male–male competition. Thus, it is generally the male who develops weapons for combating sexual competitors, engages in overt status competition, and tends to be polygamous.

This same pattern obtains to an extent in humans, as well, but human males invest relatively heavily in offspring compared with most mammals (Clutton-Brock, 1991). Nonetheless, a substantial sexual asymmetry in investment persists, leading to a significant disparity in the potential consequences of a particular act of intercourse. If

copulation leads to conception, the ancestral human male had a number of options open to him—abandonment of the female, staying with her but also seeking other mates, or remaining with her in a monogamous relationship. The ancestral female, on the other hand, had to carry the baby for nine months and nurse it thereafter. During her pregnancy, she could not increase the number of her offspring by mating with other men, and even during the period of nursing, the likelihood of pregnancy is reduced, as a short birth interval would threaten her ability to care for her first baby (Hrdy, 1999). In sum, intercourse is potentially much more expensive, and hence much more risky, for females than it is for males, so a given mating decision tends to be more consequential for women.

Although men's minimum necessary investment is low relative to women's, the long period of dependency of human young creates substantial pressure for male parental investment through provision of resources and protection of mate and offspring. Unlike most mammalian females, therefore, women's mating decisions are influenced not only by the man's genetic quality but also his prospects for investing in her and her offspring. Therefore, in addition to good looks—which are a reflection of good genes and good health—generosity, wealth (or prospects for it), strength, and bravery are all attributes of the ideal mate. Because a man's reproductive fitness is bound up with his status and resources (Betzig, 1986), men have substantial reproductive incentives to climb status hierarchies, which, to a large extent, entails attainment of dominance not over females but over other males.

Common stereotypes about the sexes are consistent with both the predictions of evolutionary psychology and empirical evidence. Women are 'choosier' in mate selection than men, meaning that they are less interested in pursuing casual sex without commitment (Clark and Hatfield, 1989). Men are much choosier in selecting wives than they are in selecting 'one-night stands', so that signals of sexual availability, which are somewhat attractive in short-term mates, are viewed quite negatively in long-term mates (Buss and Schmitt, 1993). Women are more interested than men in the economic potential of a mate, and men are more interested in youth (indicating fertility) and beauty. Men are also more interested in sexual variety, a fact that shows up not only in cross-

cultural surveys (Schmitt *et al.*, 2003), but also in research on sex differences in fantasies (Ellis and Symons, 1990) and in erotica aimed at the different sexes (Salmon and Symons, 2004).

THE IMPACT OF EVOLVED SEX DIFFERENCES IN THE WORKPLACE

These different reproductive strategies have resulted in men's inhabiting a more sexualized world than women do, which can create substantial conflicts between men and women. Because men see the world 'through sexual glasses', they tend to see situations as more sexually oriented than women do. A line of psychological studies has shown, for example, that men tend to perceive sexual interest where women perceive only friendly interest. Abbey (1982) placed a mixed-sex pair of actors in a cubicle together, and had their interactions evaluated by a mixed-sex pair of observers. Males rated the female actor as being more seductive and promiscuous than females did. Male observers also rated the female actors as being more sexually attracted to their partners than the female observers did. In a subsequent study (Abbey, 1987), men and women were asked if their friendliness toward someone of the opposite sex had ever been mistakenly perceived as a sexual invitation. Significantly more women than men reported experiencing such misperceptions, and women also reported significantly more negative emotions surrounding the incidents.

Because men tend to interpret friendly behavior as reflecting sexual interest and women tend to interpret sexually interested behavior as mere friendliness, there is much room for misunderstanding. A woman who has no interest in a sexual relationship with a man may first act in a friendly fashion, which the man may interpret as a sign of sexual interest and respond with what he believes are mild indications of sexual interest. If the woman takes the man's sexual interest to be mere friendliness, she may respond with more friendliness, which the man may view as a positive response to his display of sexual interest, thereby prompting him to respond with sexual advances.

It is just this pattern of miscommunication that caused trouble for Safeway, Inc., and its employees. In 1998, the supermarket chain implemented what it called its 'superior customer service'

program, under which clerks were directed to smile at customers, make eye contact, and call them by name (Ream, 2000). A number of female clerks filed charges of sexual harassment, claiming that this overtly friendly behavior prompted some male customers to interpret their behavior as flirtatious, which led to sexual comments, propositions, and even stalking. Exacerbating the problem of miscommunication, the Safeway policy did not permit employees to discontinue the friendly behavior when customers responded inappropriately, which further encouraged the unwelcome attention from the customer. The harassment charges were dropped when Safeway agreed with some of its unions to make the policy somewhat more flexible.

The differences in perception that lead to miscommunication are easily understood from an evolutionary perspective. As Buss (1994, p. 145), has observed, a male tendency to infer sexual interest would have been selected for 'if over evolutionary history even a tiny fraction of these 'misperceptions' led to sex'. In other words, a man who waits to make advances until he is absolutely certain that the woman is sexually interested is not likely to be as reproductively successful as a man who tries as long as there is a chance that she would be receptive, especially given the negative consequences to a woman of being too blatant about her sexual interest (Abbey, 1982), which tend to enhance the subtlety of the signals.

The risk of miscommunication is exacerbated by the perception of many men that women often are just 'playing hard to get' and often mean 'yes' even if they say 'no'. Although this notion is often referred to as a 'myth' (Semonsky and Rosenfeld, 1994, p. 515), there is substantial evidence that some women do employ this tactic. For example, more than a third of college women in one study responded positively to the question whether they had ever been in the following situation:

You were with a guy you'd never had sexual intercourse with before. He wanted to engage in sexual intercourse and you wanted to also, but for some reason you indicated that you didn't want to, although you had every intention to and were willing to engage in sexual intercourse. In other words, you indicated 'no' and you meant 'yes'.

(Muehlenhard and McCoy, 1991; also Muehlenhard and Hollabaugh, 1988). As Mealey (1992)

noted, the fact that 'females are selected to be coy will mean that sometimes 'no' really does mean 'try a little harder''. An inevitable consequence of this dynamic is that men sometimes make advances to women who do not welcome them.

The converse of men's bias toward perceiving sexual interest on the part of a woman appears to be women's bias toward perceiving sexual threat on the part of men in circumstances in which opportunities for escape are limited. Because of the substantial fitness costs to a woman who loses control over her choice of sexual partner and the timing of reproduction, natural selection has favored a woman's cautiousness about sexual coercion (Thornhill, 1996). Discomfort should begin well before an overt attempt at physical coercion is made, since by then it may be too late. Thus, the same behavior that may be perceived as friendly in an unthreatening atmosphere may be viewed as threatening where the possibilities of escape are diminished, even if the man intends no threat.

Given these manifest sex differences in attitudes toward sex and sexuality and the conflict that inevitably flows therefrom, it was entirely predictable that as more women entered the work force much of this conflict would be played out in the workplace. A good deal of what passes under the name of 'sexual harassment' is, in fact, the playing out of these evolved sex differences.

The 'Reasonable Woman' Versus the 'Reasonable Person'

One of the major unresolved issues in sexual harassment law concerns the appropriate perspective by which to judge whether a work environment is sufficiently hostile as to be illegal. Specifically, the question is whether the 'victim's perspective' should take account of sex—that is, whether the environment should be viewed from the perspective of the 'reasonable person' or that of the 'reasonable woman'.

The argument for a 'reasonable person' reflects concern that a 'reasonable woman' standard is paternalistic and imposes an obligation on men to conform to a standard of conduct that they cannot understand (Adler and Peirce, 1993). For example, one court, in rejecting the 'reasonable woman' standard, stated 'the 'reasonable woman' standard may reinforce the notion that women are 'different' from men and therefore need special

treatment—a notion that has disenfranchised women in the workplace’ (Radtke v. Everett, 1993).

In contrast, courts adopting the reasonable-woman standard have relied upon just the differences that other courts have been reluctant to recognize. As one court stated, ‘conduct that many men consider unobjectionable may offend many women’ (Ellison v. Brady, 1991). The court acknowledged that women differ in their viewpoints but noted that they also ‘share common concerns which men do not necessarily share’ and that ‘women who are victims of mild forms of sexual harassment may understandably worry whether a harasser’s conduct is merely a prelude to violent sexual assault’.

If a biological perspective can contribute anything to the sexual harassment discussion, it must be the insight that a ‘reasonable person’ standard is meaningless. When it comes to matters of sex and sexuality, there are no ‘reasonable persons’, only ‘reasonable men’ and ‘reasonable women’. The discrete sexual natures of men and women cannot be blended into a one-size-fits-all ‘human sexual nature’ that is instantiated in a sexless or hermaphroditic ‘reasonable person’. This is not to suggest, of course, that all men and all women agree among themselves about what is abusive. For example, subscribing to a feminist ideology is a significant predictor of perceived offensiveness of sexual materials and behaviors in the workplace (Brooks and Perot, 1991).

Men and women have somewhat different views about sexual harassment. Women tend to view more kinds of sex-related behavior as harassment, although the sexes differ little in their views of the most serious forms of harassment, such as coerced sex (Corr and Jackson, 2001; Rotundo *et al.*, 2001). Women are more likely than men to perceive touching or sexual comments to be sexual harassment. One widely reported finding is that a substantial majority of women would be offended by sexual overtures at work, while a substantial majority of men would be flattered (Guttek, 1985). Thus, where a man might see ‘opportunity’, a woman sees ‘danger’, a possibility demonstrated by Struckman-Johnson and Struckman-Johnson’s (1994, p. 401) finding that a substantial number of men ‘viewed an advance by a good looking woman who threatened harm or held a knife as a positive sexual opportunity’.

Cues employed in courtship are inherently ambiguous, which guarantees that miscommunication will happen with some frequency (Stockdale, 1993). Features of the workplace—such as the need for continued future association—especially encourage ambiguity (Guttek *et al.*, 1983). When a woman tells a man that she cannot go out with him because she is busy that night, she may be thinking ‘I hope he takes the hint’, while he may be thinking, ‘Great, she’s busy this time, but she didn’t reject me altogether; I’ll try again and hope she’s not busy next time’. Sometimes women would have it both ways, in that they do not want to be explicit about their rejection to avoid hurting the man’s feelings but at the same time they resent him for not taking their feelings-sparing ‘maybe some other time’ for a ‘no’. This may turn into the ‘persistent request for a date after repeated refusals’ that is often defined as harassment.

When sex differences in perspective lead to miscommunication—that is, when the man reasonably (from the perspective of the reasonable man) makes sexual overtures that a woman reasonably (from the perspective of the reasonable woman) finds disturbing or even threatening, who, if anyone, is to blame? The usual answer is that the man is responsible; after all, he has made a sexual advance that was ‘unwelcome’, and sexual harassment doctrine, at least in the US, does not make the man’s intent particularly important (Browne, 1997). However, when a person reasonably receives a message different from the one that the sender reasonably intended to convey, both subjects are engaging in miscommunication.

Some commentators dismiss with disdain suggestions that women bear any responsibility for avoiding this miscommunication. One was highly critical, for example, of a court’s statement in a sexual harassment case that the supervisor ‘must be sensitive to signals from the woman that his comments are unwelcome, and the woman . . . must take responsibility for making those signals clear’ (Oshige, 1995, p. 578). Another expressed scorn for a university official who suggested that women should avoid engaging in ‘ambiguous conduct’ (Ehrenreich, 1990, p. 1208 n.114).

These critiques notwithstanding, it may be that sexual harassment training should abandon its usual exclusive focus on male behavior and focus as well on educating women that some of their behavior might be misunderstood, that certain

kinds of sexual materials are not necessarily intended to be insulting, and that even if they feel threatened, the men may not actually be threatening them. Instead, it seems that sexual harassment training is often aimed more at heightening sensitivities rather than educating recipients to avoid miscommunication. Indeed, it is a commonplace in the literature for success of sexual-harassment training programs to be judged by the extent of increase in employees' labeling particular conduct sexual harassment.

There is, of course, a question whether a judge or jury would actually reach different decisions depending upon whether they employ a reasonable-person or reasonable-woman standard. There is mixed empirical evidence on the question. Laboratory studies typically show that the choice of standard has a modest effect in some kinds of cases, with subjects using a reasonable-woman standard being somewhat more likely to label particular conduct as harassing (Wiener *et al.*, 1995; Blumenthal, 1998; Gutek *et al.*, 1999; Wiener and Hurt, 2000). A study of all reported federal cases over a 10-year period found no statistically significant difference in outcomes between cases explicitly relying on a reasonable-woman standard and those employing a reasonable-person standard (Juliano and Schwab, 2001), although the fact that most cases did not identify the standard being employed suggests caution in drawing too much from the null results. Another study examining the decided cases and controlling for a variety of other factors found that courts deciding cases in 'reasonable woman' jurisdictions were slightly more likely to find for the plaintiff (Perry *et al.*, 2004).

Power Versus Sex

Many who write about sexual harassment assert with conviction that sexual harassment is not 'about sex' at all, but 'about power', (Bravo and Cassidy, 1992; Avner, 1994)—echoing equivalent claims often made about the motivations of rapists (see discussion in Palmer and Thornhill, 2003)—although they seldom explain why it is important to view it that way. No matter the reason, they often go out of their way to assert, or at least to imply, that victims are not selected according to criteria of sexual attractiveness but rather chosen more or less at random to be victims of a male need to oppress women. For example, Gutek

(1985, p. 54) asserts that sexual harassment 'is likely to happen to almost any female worker', but on the next page she points out that victims tend to be young and either single or divorced. Another device is to set up an extreme straw man, and in rejecting it to leave a misleading impression. Thus, Workman and Johnson (1991, p. 776) note that 'some individuals believe only attractive women are sexually harassed', but that 'empirical studies do not support this belief, since women in all ranges of attractiveness have reported harassment'. Although this statement leaves the casual reader with the impression that unattractive women are as likely to be targets as attractive women, all the writers have actually said is that not all victims are attractive (although, for all we know, they may have been the most attractive victims available to their harassers).

Because of the centrality of sexual behavior to reproductive fitness, an evolutionary perspective should lead to acute skepticism about a claim that activities that result in sexual intercourse are not 'about sex'. This skepticism is especially warranted when the claim is that power and sex are unrelated, as dominance and sexuality share some of the same roots. As Dabbs (2000, p. 10) has noted, 'the major social effect of testosterone is to orient us toward issues of sex and power'. Sexual coercion, it should be emphasized, is not a cultural invention of humans born of an ideology of patriarchy, but rather is a widespread pattern throughout the animal kingdom (Clutton-Brock and Parker, 1995).

Throughout human history, men have used power as a way of obtaining sex, whether coercively or through making themselves more attractive as mates. Men with the most power in history—despots whose subjects lived at their sufferance—routinely surrounded themselves with nubile women whose favors they could command at their pleasure (Betzig, 1986). Male 'despots' in the workplace sometimes adopt a similar strategy, and there is little reason to think that their motives are any less sexual than those of an eastern emperor. Thus, even the sexual harassment cases that most conspicuously involve power—clear quid pro quo cases—are about both power *and* sex: a supervisor is using his workplace power to extort sexual compliance. To say that it is *only* about power makes no more sense than saying that bank robbery is only about guns and not about money.

A study commonly invoked to support the argument that sexual harassment is not about sex was conducted by Tangri *et al.* (1982). They proposed and tested three models of sexual harassment: the 'natural/biological' model, which views harassment as a consequence of natural physical attraction; the 'organizational' model, which views harassment as a consequence of organizational hierarchy, allowing individuals to use their organizational power to oppress their subordinates; and the 'sociocultural' model, which views sexual harassment as a result of sex-role socialization and the differential distribution of power in the larger society. They concluded that there was evidence to support the latter two models but little to support the first (the explanations are not mutually exclusive, of course). Following the Tangri study, the idea that there is any significant biological contribution to harassment is usually mentioned just to be dismissed.

The rejection of the natural/biological model resulted from the failure of the data to satisfy the predictions that the researchers derived from the model. They had predicted that if this model were correct, harassers and victims would be of both sexes; victims would be similar to their harassers in age, race, and occupational status; both harasser and victim would be unmarried; and the harasser would direct his attention only toward the victim. They also predicted that the behaviors would resemble courtship behaviors, they would stop once the victim indicated a lack of interest, and victims would be 'flattered' by the behaviors (although why a woman should be expected to be 'flattered' by behavior she viewed as harassment is hard to fathom). Because their data did not satisfy those expectations, they rejected the model.

Tangri and associates oddly concluded that the tendency of individuals with greater degrees of personal vulnerability and dependence on their job to experience more harassment was some of the 'strongest evidence available in these data against the natural model' (p. 52). Their apparent view was that young, unattached women are particularly vulnerable and that it is simply coincidental that such women would also be sexually attractive to a potential harasser (although they did not explain why a young single woman is more vulnerable than, say, a 55-year-old woman who has worked for the same employer for 30 years but has no pension). However, it is not clear why a finding that victims were vulnerable would

undermine the natural/biological model. If the harasser's strategy is to convert his workplace power into satisfaction of his sexual urges—which is the essence of quid pro quo harassment—he must focus on targets susceptible to the exercise of that power. It is not just attractiveness that is important to him; it is attractiveness plus accessibility.

The test of a model is valid only if the predictions derived from the model actually follow from the model. This study was actually constructed not to test whether the harasser's motives were based upon sexual attraction but rather whether the harassers were looking for long-term exclusive mates. No one has suggested, however, that sexual harassment is mostly 'about marriage'. What the researchers should have tested was whether the victims of harassment tend to possess those traits that would cause them to be viewed as attractive long-term *or* short-term mates.

A later study by Studd and Gattiker (1991), informed by evolutionary psychology, analyzed patterns of sexual harassment and concluded that the demographic profiles of targets were largely what would be expected if harassers are employing short-term sexual strategies (see Buss and Schmitt, 1993). The strongest prediction is that the harasser is male and the victim is female, since men are usually the sexual initiators in both long-term and short-term mating. Other predictions are that the target will be of reproductive age, physically attractive, and not involved in a serious long-term relationship. These predictions are largely satisfied. Less than 1% of federal cases over a 10-year period involved sexually based behavior aimed at a male employee by a female supervisor (Juliano and Schwab, 2001). The overwhelming proportion of victims are single, divorced, or separated women under the age of 35 (Terpstra and Cook, 1985; Studd and Gattiker, 1991). Studd and Gattiker concluded that the motivation of most men involved in coercive sex in the workplace was indeed sexual (although not romantic). Moreover, in laboratory studies, subjects seem to assume that harassers' motives are sexual, as they are substantially more likely to find that sexual harassment occurred when the plaintiff is attractive and when the harasser is unattractive (Castellow *et al.*, 1990).

There is some confusion in the literature about what predictions one should make concerning the effect of a man's status on a woman's reaction to sexual advances in the workplace. For example,

Buss (1999, p. 319; also Buss, 2004, p. 318) has suggested that 'The degree of chagrin that women experience after sexual advances, however, depends in part on the status of the harasser', with women being less upset by advances from higher-status men. Bourgeois and Perkins (2003) claim to have 'overwhelmingly refuted' Buss's prediction through their finding that women report imagining *greater* upset if someone higher in their organization persisted in asking them out on a date despite their repeated refusals than if the requests came from someone with lower status. Thus, they assert, their findings support the socio-cultural explanation and refute the evolutionary psychology explanation. It is critical to note, however, that Bourgeois and Perkins's study, unlike the study Buss was referring to, placed the high-status man above the woman in the organization. Bourgeois and Perkins do acknowledge, however, that *absent* power differentials, 'the evolutionary hypothesis seems to apply' (p. 349).

Rather than refuting the evolutionary psychology account, the Bourgeois and Perkins results are actually predicted by evolutionary psychology. Two separate well-documented findings are relevant to these predictions. The first is that women tend to prefer high-status men to low-status men (Buss, 2004, pp. 110–115). Thus, all else being equal, they are likely to find advances by the former more welcome than advances by the latter. The second finding is that women are strongly averse to sexual coercion, as loss of control over mating decisions is potentially very costly to them (Thornhill, 1996). Thus, women will suffer more distress when the possibility of sexual coercion is high than when it is low. These findings yield two predictions. First, women are likely to find advances by high-status men in their own organizations to be more welcome than advances by low-status men in their organizations. Second, if the advances are *not* welcome, women are more likely to be upset by persistent advances by their superiors—who have the organizational power to coerce them—than by persistent advances by peers, who likely lack that power. These predictions were tested by Colarelli and Haaland (2002), whose study varied the man's power and status separately. They found that power and status interacted, with harassment ratings increasing as power increased and status decreased. Thus, advances by a relatively low-status man who held power over the woman were most distressing.

Although Colarelli and Haaland found no main effect for status in their particular sample, a female preference for high-status males is, as mentioned above, well-established in the literature.

An approach that focuses solely on power without resort to sex differences in sexual psychology cannot explain why women almost never coerce sex from their subordinates. Some argue that one seldom sees coercion by female superiors because women ordinarily lack the necessary power (Tangri *et al.*, 1982; Fitzgerald and Weitzman, 1990). However, large numbers of women hold management and supervisory positions in the workplace and faculty positions in colleges and universities. Nonetheless, reported instances of sexual coercion by female managers and professors are relatively rare. Although one might argue that because of the readiness of many men to engage in casual sex, women do not need to coerce them, that response itself rests on the different sexual psychologies of men and women. However, there is, in fact, little evidence that women supervisors engage in frequent *voluntary* sexual relations with their subordinates, either, and women's preference for higher-status mates would suggest that this would be a relatively uncommon occurrence.

One variant of the sociocultural theory holds that sexual harassment is an attempt by men to exert power because of their fear that women constitute a threat to men's economic or social standing (Gutek, 1992). Such an argument would predict an inverse relationship between male societal power and sexual coercion. Yet, the most pervasive coercive sex in the history of the master–servant relationship is not between men and women in the modern workplace—where women are participating in the workplace as equals like never before—but rather between a slave owner and his slaves. Female slaves did not constitute a threat to their owner's economic or social standing; instead they were a reflection of it. Nonetheless, sexual relations between slave and owner were extremely common, and indeed were one of the principal objections of many abolitionists to the institution of slavery (Genovese, 1976). The historical record is clear that slave owners did not seek slave women at random for sexual relations. Rather, they preferred those who possessed the attributes that men typically value in sexual partners: reproductive value as demonstrated by youth and beauty. This preference was reflected in

price, as a prime field hand would sell in New Orleans for \$1800, a top-quality blacksmith would go for \$2500, while a 'particularly beautiful girl or young woman might bring \$5000' (Genovese, 1976, p. 416).

One recurrent, yet implausible, theme in the literature is that sexual harassment represents an implicit conspiracy through which men combine to oppress women (Farley, 1978, p. xvi). Some researchers have suggested that the reason that married women are less likely to be harassed is that harassers are honoring the 'property rights' of other men (Gutek, 1985, p. 57; Lafontaine and Tredeau, 1986), as if men have a pact among themselves that they will sexually coerce each others' daughters and sisters but not their wives. Under this view, male harassers (the majority of whom are married) are more willing to honor the marital vows of other men than they are to honor their own. This 'property rights' argument rests uneasily with Schneider's (1982) finding that 'closeted' lesbians—who might have a male partner for all the harasser knows—are subjected to *more* sexual advances than 'open' lesbians—whose partners are known to be women—a finding that suggests that predicted receptivity is a factor influencing men's overtures.

The relationship between power and sexual harassment is considerably more subtle than is often appreciated. Bargh and Raymond (1995) have suggested that many men in supervisory positions do not realize they are exploiting their power, because for them there is an unconscious link between power and sex. When such a man is in a position of power over a woman, an 'automatic power—sex association' becomes activated, which tends to enhance the likelihood that he will interpret a woman's behavior as indicating sexual interest and also to enhance his perceptions of her attractiveness (also Bargh *et al.*, 1995; Zurbriggen, 2000). The man may see a sexual situation in which the attraction seems to be reciprocated, although the woman is simply being deferential and friendly to a man who has power over her.

The finding that many men have an automatic association of power and sex suggests that modification of sexual harassment training may be appropriate. Much of that training is focused on warning men that they should not exploit their power over subordinates to coerce sex or, more generally, that sexual relationships between

supervisors and subordinates are inappropriate. Neither of these messages is likely to be terribly effective in modifying the behavior of a man having the power/sex association. Such a man would not tend to view his conduct as exploitative if he is unaware that it is his power that creates the attraction. Moreover, if he perceives the relationship as one of mutual attraction, he is less likely to abide by institutional strictures against supervisor—subordinate relationships. Perhaps a better strategy is to educate men specifically that being in a position of power will sometimes result in erroneous perceptions, especially in light of Bargh and Raymond's estimate that three-quarters of harassers do not realize that they are engaging in harassment.

Power is unquestionably an important component of some kinds of sexual harassment. It is an essential ingredient of quid pro quo harassment, since the harasser must have the apparent power to carry through on his threat if sexual access is denied, and therefore vulnerability to the exercise of that power will be a typical feature of extortionate harassment. But the claim that 'the goal of sexual harassment is not sexual pleasure but gaining power over another' (Bravo and Cassidy, 1992) gets the relationship exactly backwards. The focus on power to the exclusion of sex appears to be an unfortunate side effect of the fact that most of the scholarship on harassment has been from the woman's, if not the feminist's, point of view. From the perspective of the victim, it may seem like all power and no sex. But if the goal of the law is to regulate the harasser's actions, it is his perspective that must be understood rather than that of the victim.

'Because of Sex'

Although many commentators underestimate the sexual component of quid pro quo harassment, many also overestimate the sexual component of some hostile-environment harassment. When the hostile environment consists of sexual expression or conduct, courts generally view that fact as proof that the actions are motivated by hostility on the basis of sex (Browne, 1997), as of course they often are. But not all hostility or harassment directed toward a woman flows from sex-based animus, even if it is expressed in a sex-based way.

Women may be called vulgar sexual names and men may make crude overtures to women that on

their face look like 'sexual advances'. However, when a man says something like 'give me some of that stuff', his 'request' is not a 'sexual advance', in the sense that he engages in the conduct in the hope that the woman will respond favorably, but instead it is generally a form of sex-based insult. In many cases, the insult may arise out of hostility toward women, hostility that is sometimes activated by entry of women into traditionally all-male workplaces. On the other hand, it may actually be more about dominance—which may have nothing to do with the sex of the target—or hostility—which may not necessarily be based on sex.

Insulting language is usually not sex-neutral in nature. Few of the myriad vulgar epithets that flow like water today are characteristically applied indiscriminately to both sexes. Indeed, a study that asked subjects to identify the worst things that one could call a man and the worst things that one could call a woman found no overlap in the most frequently named insults (Preston and Stanley, 1987). Even when the same word is used toward individuals of different sexes, the meaning may be different (e.g. calling a woman 'bitch' or 'a whore' means something different from calling a man the same things).

Many people (perhaps especially men) are prone to cruel and aggressive behavior toward those they dislike or perceive to be vulnerable. Where they see weakness, they may attack. Their dislike may or may not be based upon sex-based animus, but regardless of whether it is, their behavior may have sexual overtones, both because of the sexualized world view that men tend to possess and the fact that attackers will choose language to which they believe their target is particularly sensitive. It is important to remember that men's quest for dominance has not been primarily about attaining dominance over women, but rather achieving dominance over other men (Buss, 1996), a fact that may explain Gutek's (1985, p. 32) finding that in the workplace 'women are less often treated disrespectfully than men are'.

Much of what women perceive to be harassment because of their sex may actually be the ritual hazing to which all employees in some workplaces are exposed. This hazing is not necessarily based on either individual or group hostility, but instead is often a method by which senior group members establish their seniority and dominance over others, and it is a way of testing new members

(Josefowitz and Gadon, 1989). Even when women are subjected to the same hazing as men, they often respond to it differently. Women are more likely than men, for example, to become visibly angry or upset, a reaction that often elicits more hazing, and they are more likely to seek assistance from their supervisors, which may interfere with their full acceptance into the group.

Fitzgerald (1993, p. 1071) has complained that 'virtually millions of women are subjected to experiences ranging from insults to assault—many on an ongoing or recurrent basis—as the price of earning a living'. At some level this is true, but it is also true for millions of men. Thus, when women insist that they do not want 'special treatment' but instead simply want to be treated the way men are treated, they may not understand exactly what it is they are wishing for.

CONCLUSION

The Utopian workplace desired by some—where men and women are equally represented in all occupations and at all hierarchical levels and in which men and women behave in the same desexualized, yet fundamentally feminine, manner—is not one likely to be created by our evolved minds. The tabula rasa perspective of human nature—the view that sex is just a 'social construct' (Chamallas, 1992, p. 129)—has encouraged many to believe that people (especially men) can simply be educated to leave their sexual psychologies behind them and enter a workplace in which they adopt 'work roles' that are largely independent of their psyches. This same perspective has led to the adoption of a sexless 'reasonable person' standard in sexual harassment law—an ideal androgynous blend of male and female psychologies. Failure to understand male psychology has led many women to assert that they just want to be treated like men when in fact, for very fundamental reasons, men often do not treat each other very well.

Although many have urged a 'desexualization' of the workplace, it is not clear that this is either a practical or desirable goal. A realistic view of human nature suggests that as long as men and women inhabit the same workplaces, they will interact as human beings. Part of the way that human beings interact is sexually and romantically. Although sexual harassment surveys ask whether women have ever received unwanted

sexual advances in the workplace, the surveys seldom ask whether women have ever received welcome ones. Given the large number of workers who find their romantic partners at work (Schneider, 1984), the answer for many would probably be in the affirmative.

An understanding of evolved sex differences in sexual psychologies is essential to the understanding of the behaviors produced by those psychologies and can assist in their management. Sexual harassment training might more productively focus on educating men and women about sex differences in perspectives to avoid miscommunication rather than simply heightening female employees' inclinations to be offended. Similarly, because of the association that many men have between power and sex, educating male supervisors about the risk of oversexualized perceptions of interactions when they are in dominant positions over women may forestall much unwelcome sexual attention.

Recognition of the fact that sexual harassment is a manifestation of our evolved psychologies does not mean that sexual harassment is either good or inevitable. Many behaviors having origins in our evolved psychologies are recognized to be social pathologies even if they do not reflect psychological pathologies (see Buss, 2005). Behaviors are susceptible of modification, even if our underlying psychologies are not, and it should be remembered that our evolved psychologies are not only the source of sexual harassment but also of our desire to combat it.

REFERENCES

- Abbey A. 1982. Sex differences in attributions for friendly behavior: do males misperceive females' friendliness? *Journal of Personality and Social Psychology* **42**: 830–838.
- Abbey A. 1987. Misperceptions of friendly behavior as sexual interest: a survey of naturally occurring incidents. *Psychology of Women Quarterly* **11**: 173–194.
- Adler RS, Peirce ER. 1993. The legal, ethical, and social implications of the 'reasonable woman' standard in sexual harassment cases. *Fordham Law Review* **61**: 773–827.
- Arvey RD, Cavanaugh MA. 1995. Using surveys to assess the prevalence of sexual harassment: some methodological problems. *Journal of Social Issues* **51**: 39–52.
- Avner JI. 1994. Sexual harassment: building a consensus for change. *Kansas Journal of Law and Public Policy* **3**: 57–76.
- Bargh JA, Raymond P. 1995. The naive misuse of power: nonconscious sources of sexual harassment. *Journal of Social Issues* **51**: 85–96.
- Bargh JA, Raymond P, Pryor JB, Strack F. 1995. Attractiveness of the underling: an automatic power-sex association and its consequences for sexual harassment and aggression. *Journal of Personality and Social Psychology* **68**: 768–781.
- Betzig L. 1986. *Despotism and Differential Reproduction: A Darwinian View of History*. Aldine: New York, NY.
- Blumenthal JA. 1998. The reasonable woman standard: a meta-analytic review of gender differences in perceptions of sexual harassment. *Law and Human Behavior* **22**: 33–57.
- Bourgeois MJ, Perkins J. 2003. A test of evolutionary and sociocultural explanations of reactions to sexual harassment. *Sex Roles* **49**: 343–351.
- Bowman K. 1999. Sexual harassment in the workplace: a minor problem. *Roll Call* March 25.
- Bravo E, Cassidy E. 1992. *The 9 to 5 Guide to Combating Sexual Harassment*. Wiley: New York.
- Brooks L, Perot AR. 1991. Reporting sexual harassment: exploring a predictive model. *Psychology of Women Quarterly* **15**: 31–47.
- Browne KR. 1997. An evolutionary perspective on sexual harassment: seeking roots in biology rather than ideology. *Journal of Contemporary Legal Issues* **8**: 5–77.
- Browne KR. 1998. An evolutionary account of women's workplace status. *Managerial and Decision Economics* **19**: 427–440.
- Browne KR. 2002. *Biology at work*.
- Browne KR. 2006. Evolved sex differences and occupational segregation. *Journal of Organizational Behavior*, in press.
- Buss DM. 1994. *The Evolution of Desire: Strategies of Human Mating*. Basic Books: New York.
- Buss DM. 1996. Sexual conflict: evolutionary insights into feminism and the 'battle of the sexes'. In *Sex, Power, Conflict: Evolutionary and Feminist Perspectives*, Buss DM, Malamuth NM (eds). Oxford University Press: New York.
- Buss DM. 1999. *Evolutionary Psychology: The New Science of the Mind*. Allyn & Bacon: Needham Heights, MA.
- Buss DM. 2004. *Evolutionary Psychology: The New Science of the Mind* (2nd edn). Allyn & Bacon: Boston, MA.
- Buss DM. 2005. *The Murderer Next Door: Why the Mind is Designed to Kill*. Penguin Press: New York.
- Buss DM, Schmitt DP. 1993. Sexual strategies theory: an evolutionary perspective on human mating. *Psychological Review* **100**: 204–232.
- Castellow WA, Wuensch KL, Moore CH. 1990. Effects of physical attractiveness of the plaintiff and defendant in sexual harassment judgments. *Journal of Social Behavior and Personality* **5**: 547–562.

- Chamallas M. 1992. Feminist constructions of objectivity: multiple perspectives in sexual and racial harassment litigation. *Texas Journal of Women and the Law* 1: 95–142.
- Clark RD III, Hatfield E. 1989. Gender differences in receptivity to sexual offers. *Journal of Psychology and Human Sexuality* 2: 39–55.
- Clutton-Brock TH. 1991. *The Evolution of Parental Care*. Princeton University Press: Princeton, NJ.
- Clutton-Brock TH, Parker GA. 1995. Sexual coercion in animal societies. *Animal Behaviour* 49: 1345–1365.
- Colarelli SM, Haaland S. 2002. Perceptions of sexual harassment: an evolutionary psychological perspective. *Psychology, Evolution and Gender* 4: 243–264.
- Corr PJ, Jackson CJ. 2001. Dimensions of perceived sexual harassment: effects of gender and status/liking of protagonist. *Personality and Individual Differences* 30: 525–539.
- Dabbs JM. 2000. *Heroes, Rogues, and Lovers*. McGraw-Hill: New York.
- Defeis EF. 2004. Equality and the European Union. *Georgia Journal of International and Comparative Law* 32: 73–98.
- Ehrenreich NS. 1990. Pluralist myths and powerless men: the ideology of reasonableness in sexual harassment law. *Yale Law Journal* 99: 1177–1234.
- Ellis BJ, Symons D. 1990. Sex differences in sexual fantasy: an evolutionary psychological approach. *Journal of Sex Research* 27: 527–555.
- Ellison v. Brady*, 924 F.2d 872, 9th Cir. 1991.
- Farley L. 1978. *Sexual Shakedown*. McGraw-Hill: New York.
- Fitzgerald LF. 1993. Sexual harassment: violence against women in the workplace. *American Psychologist* 48: 1070–1076.
- Fitzgerald LF, Weitzman LM. 1990. Men who harass: speculation and data. In *Ivory Power: Sexual Harassment on Campus*, Paludi MA (ed.). SUNY Press: Albany, NY.
- Genovese ED. 1976. *Roll, Jordan, Roll: The World the Slaves Made*. Vintage: New York.
- Gutek BA. 1985. *Sex and the Workplace: The Impact of Sexual Behavior and Harassment on Women, Men, and Organizations*. Jossey-Bass: San Francisco, CA.
- Gutek BA. 1992. Understanding sexual harassment at work. *Notre Dame Journal of Law, Ethics, and Public Policy* 6: 335–358.
- Gutek BA, Morasch B, Cohen AG. 1983. Interpreting social-sexual behavior in a work setting. *Journal of Vocational Behavior* 22: 30–48.
- Gutek BA, Murphy RO, Douma B. 2004. A review and critique of the Sexual Experiences Questionnaire (SEQ). *Law and Human Behavior* 28: 457–482.
- Gutek BA, O'Connor MA, Melançon R, Stockdale MS, Geer TM, Done RS. 1999. The utility of the reasonable woman legal standard in hostile environment sexual harassment cases: a multimethod, multistudy examination. *Psychology, Public Policy, and Law* 5: 596–629.
- Holman v. Indiana*, 211 F.3d 399 (7th Circuit), cert. denied, 531 US 880, 2000.
- Hrdy SB. 1999. *Mother Nature: A History of Mothers, Infants, and Natural Selection*. Pantheon, New York.
- Josefowitz N, Gadon H. 1989. Hazing: uncovering one of the best-kept secrets of the workplace. *Business Horizons* May: 22–26.
- Juliano A, Schwab SJ. 2001. The sweep of sexual harassment cases. *Cornell Law Review* 86: 548–593.
- Kanazawa S. 2005. Is 'discrimination' necessary to explain the sex gap in earnings? *Journal of Economic Psychology* 26: 269–287.
- Kelly JM. 2000. Sexual harassment of employees by customers and other third parties: American and British views. *Texas Tech Law Review* 31: 807–867.
- Lafontaine E, Tredeau L. 1986. The frequency, sources, and correlates of sexual harassment among women in traditional male occupations. *Sex Roles* 15: 433–442.
- Mealey L. 1992. Alternative adaptive models of rape. *Behavioral and Brain Sciences* 15: 397–398.
- Meritor Savings Bank, FSB v. Vinson*, 477 US 57, 1986.
- Muehlenhard CL, Hollabaugh LC. 1988. Do women sometimes say no when they mean yes? The prevalence and correlates of women's token resistance to sex. *Journal of Personality and Social Psychology* 54: 872–879.
- Muehlenhard CL, McCoy ML. 1991. Double standard/double bind: the sexual double standard and women's communication about sex. *Psychology of Women Quarterly* 15: 447–461.
- Oshige M. 1995. What's sex got to do with it? *Stanford Law Review* 47: 565–594.
- Palmer CT, Thornhill R. 2003. Straw men and fairy tales: evaluating reactions to A Natural History of Rape. *Journal of Sex Research* 40: 249–255.
- Perry EL, Kulik CT, Bourhis AC. 2004. The reasonable woman standard: effects on sexual harassment court decisions. *Law and Human Behavior* 28: 9–27.
- Preston K, Stanley K. 1987. 'What's the worst thing . . . ?' Gender directed insults. *Sex Roles* 17: 209–219.
- Radtke v. Everett*, 501 N.W.2d 155, Mich. 1993.
- Ream SL. 2000. When service with a smile invites more than satisfied customers: third-party sexual harassment and the implications of charges against Safeway. *Hastings Women's Law Journal* 11: 107–122.
- Rich S. 1981. Schlafly: sex harassment on job no problem for virtuous women. *Washington Post* April 22: A-2.
- Rotundo M, Nguyen D-H, Sackett PR. 2001. A meta-analytic review of gender differences in perceptions of sexual harassment. *Journal of Applied Psychology* 86: 914–922.
- Salmon C, Symons D. 2004. Slash fiction and human mating psychology. *Journal of Sex Research* 41: 94–100.
- Schmitt DP, 118 Members of the International Sexuality Description Project. 2003. Universal sex differences in the desire for sexual variety: tests from 52 nations, 6 continents, and 13 islands. *Journal of Personality and Social Psychology* 85: 85–104.
- Schneider BE. 1982. Consciousness about sexual harassment among heterosexual and lesbian women workers. *Journal of Social Issues* 38: 75–97.

- Schneider BE. 1984. The office affair: myth and reality for heterosexual and lesbian women workers. *Sociological Perspectives* **27**: 443–464.
- Semonsky MR, Rosenfeld LV. 1994. Perceptions of sexual violations: denying a kiss, stealing a kiss. *Sex Roles* **30**: 503–520.
- Stockdale MS. 1993. The role of sexual misperceptions of women's friendliness in an emerging theory of sexual harassment. *Journal of Vocational Behavior* **42**: 84–101.
- Struckman-Johnson C, Struckman-Johnson D. 1994. Men's reactions to hypothetical female sexual advances: a beauty bias in response to sexual coercion. *Sex Roles* **31**: 387–405.
- Studd MV, Gattiker UE. 1991. The evolutionary psychology of sexual harassment in organizations. *Ethology and Sociobiology* **12**: 249–290.
- Tangri SS, Burt M, Johnson L. 1982. Sexual harassment at work: three explanatory models. *Journal of Social Issues* **38**: 33–54.
- Terpstra DE, Baker DD. 1986. A framework for the study of sexual harassment. *Basic and Applied Social Psychology* **7**: 17–34.
- Terpstra DE, Cook SE. 1985. Complainant characteristics and reported behaviors and consequences associated with formal sexual harassment charges. *Personnel Psychology* **38**: 559–574.
- Thornhill NW. 1996. Psychological adaptation to sexual coercion in victims and offenders. In *Sex, Power, Conflict: Evolutionary and Feminist Perspectives*, Buss DM, Malamuth NM (eds). Oxford University Press: New York.
- Tiger L. 1997. Comment on article by Kingsley Browne. *Journal of Contemporary Legal Issues* **8**: 79–86.
- Trivers RL. 1972. Parental investment and sexual selection. In *Sexual Selection and the Descent of Man*, Campbell BG (ed.). Aldine: Chicago, IL.
- Wiener RL, Hurt LE. 2000. How do people evaluate social sexual conduct at work? A psycholegal model. *Journal of Applied Psychology* **85**: 75–85.
- Wiener RL, Watts BA, Goldkamp KH, Gasper C. 1995. Social analytic investigation of hostile work environments. *Law and Human Behavior* **19**: 263–281.
- Workman JE, Johnson KP. 1991. The role of cosmetics in attributions about sexual harassment. *Sex Roles* **24**: 759–769.
- Zalk SR. 1990. Men in the academy: a psychological profile of harassment. In *Ivory Power: Sexual Harassment on Campus*, Paludi MA (ed.). SUNY Press: Albany, NY.
- Zurbriggen EL. 2000. Social motives and cognitive power-sex associations: predictors of aggressive sexual behavior. *Journal of Personality and Social Psychology* **78**: 559–581.