

Sexual Harassment or Consensual Sexual Relations? Implications for Social Work Education

Jill S. Levenson, Ph.D., LCSW
Lynn University

Journal of Social Work Values and Ethics, Volume 3, Number 2 (2006)
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Abstract

Although there is consensus regarding the most egregious forms of sexual harassment in academia, the acceptability of consensual relationships between professors and students remains a subject of some debate. The issue may have special significance for social work educators, who are charged with modeling and inspiring awareness of oppression and exploitation. It is argued here that sexual relationships between students and professors represent a dual relationship and cannot be truly consensual because of the inherent power disparities that exist. Implications for schools of social work are offered.

Key Words: Sexual harassment, boundaries, social work educator, teacher, consensual sexual relations, higher education

Introduction

Sexual harassment emerged as a social issue during the 1970s as the women's movement and the sexual revolution gradually altered society's perception of the genders (Dziech & Hawkins, 1998). Evolving in the U.S. employment arena under Title VII of the 1964 Civil Rights Act, definitions of sexual harassment in the workplace have been clarified and refined over the past quarter century, as courts across the nation have ruled on the issue. Sexual harassment gained worldwide media attention in 1992 when, during Clarence Thomas' U.S. Supreme Court confirmation hearings, Anita Hill accused him of sexual harassment.

Sexual harassment is defined by the United States Equal Employment Opportunity Commission (EEOC) as unwelcome sexual advances, requests for sexual favors, and/or other verbal or physical conduct of a sexual nature. These behaviors usually fall into one of two categories that are recognized as a result of landmark legal decisions. Quid pro quo harassment is

described as sexual behavior that is exchanged for a promised benefit or avoidance of punishment (Landis-Schiff, 1996). Hostile environment harassment refers to sexual conduct that creates an intimidating or uncomfortable atmosphere (Landis-Schiff, 1996).

The publication of *The Lecherous Professor: Sexual Harassment on Campus* (Dziech & Weiner, 1984) provoked heightened awareness of sexual harassment in academia when the authors reported that 30 percent of undergraduate women revealed they had experienced sexual harassment from at least one of their instructors during four years of college. Feminist author Michele Paludi's book *Ivory Power* (Paludi, 1990) drew further attention to the problem of sexual harassment in academic settings as she explored the dynamics of power in relationships between students and professors. Studies have revealed that 60% of female graduate students reported at least one incident of sexual harassment (Schneider, 1987), and that most perpetrators are male, and most victims are female (Singer, 1994; Strauss, 1992).

These statistics may underrepresent the scope of the problem. Less than five percent of academic sexual harassment incidents are estimated to be formally reported (Fitzgerald, Shullman, Bailey, Richards, Swecker, Gold, Ormerod, & Weitzman, 1988). The reasons for this lack of reporting are varied and include fear of not being believed, fear of retaliation, lack of knowledge of reporting procedures, and feelings of embarrassment or shame (Rubin, Borgers, & Tollefson, 1996). Women are more likely to report harassment than men, and the likelihood of reporting decreases with the lesser severity of the incident (Rubin et al., 1996).

In the 21st century, most academicians acknowledge the existence of sexual harassment, and increasing numbers of reported incidents have led to University policies and procedures to address the pervasiveness of the problem and its effects (Dziech & Hawkins, 1998). While there is agreement on the most egregious cases, definitional ambiguity continues to exist. For example, *quid pro quo* sexual harassment -- threatening or bribing a student in exchange for sexual favors -- is widely accepted as improper (Dziech & Hawkins, 1998). Hostile environment (Sandler & Shoop, 1997). Even less clear is whether "consensual" relationships between students and teachers constitute harassment.

Some guidance is offered in various ethical standards and guidelines although complete clarity on the issue remains elusive. The National Association of Social Workers (NASW) *Code of Ethics* (NASW, 1996) specifically includes a provision that social work educators should not

engage in dual relationships with students that create a risk of exploitation or potential harm. Furthermore, Section 2.08 of the Code states: “social workers should not sexually harass supervisees, students, trainees, or colleagues. Sexual harassment includes sexual advances, sexual solicitation, requests for sexual favors, and other verbal or physical conduct of a sexual nature.” The NASW *Code of Ethics* does not state that the sexual behavior must be non-consensual or uninvited, and in fact seems to imply by that omission that any and all sexual behavior between supervisees, students, trainees, or colleagues is unethical. However, it will be assumed, for the purpose of this paper, that the *Code* intended to include those unwelcome or exploitative sexual behaviors consistent with the EEOC description of sexual harassment, and to exclude consensual sexual relationships between colleagues of equal status. The Council on Social Work Education (CSWE) more explicitly describes sexual harassment as any sexual conduct between students and teachers that involves a power differential, including either consensual or forced sexual contact (Schank, 1994).

Other mental health professions also publish professional ethical standards offering guidelines about maintaining appropriate boundaries and the mixing of multiple relationships (American Association for Marriage and Family Therapy, 1998; American Counseling Association, 1996; American Psychological Association, 1995). Evans and Hearn (1997) constructed a matrix of dual relationships assessing the ethics of a wide range of potential additional relationships (e.g., social, sexual, business) that could affect the primary professional roles of therapist, instructor, supervisor, and researcher. They suggested that a sexual liaison with a student while in the primary professional role of instructor was indeed a dual relationship, though they did not explicitly label this type of behavior as harassment (Evans & Hearn, 1997).

Little has been written about sexual harassment in social work education, but the problem has been identified as one worthy of consideration (Congress, 1996;2001). Social workers strive to empower others, to promote social justice, and to protect vulnerable individuals from discrimination and oppression (National Association of Social Workers, 1996). Although the NASW code of ethics refers primarily to work with clients, it also describes more broadly our ethical responsibilities as professionals, and, specifically, as social work educators.

It is perhaps the issue of consent that is the salient feature in this debate. It will be suggested here that sexual relationships between students and professors cannot be truly consensual because

of the dual relationship that exists and its inherent power imbalance. The debate may have special significance for social work educators, who are charged with modeling and inspiring awareness of oppression and exploitation.

Social, Cultural, and Political Context

Feminist scholars (Brownmiller, 1975; Dworkin, 1974; Russell, 1984) have long theorized that various types of sexual aggression exist in the context of a patriarchal society in which male domination and female submission are continuously reinforced. Socially, economically, and politically, it is argued, females lack power relative to males. This power disparity creates a vicious cycle in which males continue to be socialized in gender-specific traits such as strength, aggressiveness and independence, and females are taught passivity, patience, and dependence (Lips, 1981). Likewise, organizational models suggest that women, in general, have less status, power, and income than men (LeMoncheck, 1997). Indeed, although 79 percent of the social work profession is made up of females (National Association of Social Workers, 2002), male social workers hold a disproportionate number of managerial and administrative positions and earn more money than female social workers (Gibelman & Schervish, 1993). As well, in academic settings, a larger percentage of males hold higher rank positions than do females (Council on Social Work Education, 2000).

Some feminist theorists argue that economic forces make heterosexual relationships compulsory for women, because women have less earning power than men and therefore depend on men for financial support (LeMoncheck, 1997). From prostitution to marriage, consent to sex is not truly given freely by women, some feminists maintain, but as payment in exchange for their survival. These radical feminists suggest that sexual relationships that begin in the workplace are inherently involuntary and unequal because men have more power, income, and status (LeMoncheck, 1997). Students cannot consent to sex with professors for these same reasons, it has been argued, and student-teacher sex is another example of sexual exploitation.

An opposing feminist viewpoint contends that women should be able to enjoy sexual freedom as do men, and that restrictions on sexual expression are another form of oppressive and discriminatory practices (Chancer, 1998). Gallop (1999) asserted that to deny a female student the right to consent to sex is harassment in and of itself. She analogized sexual harassment to policies prohibiting consensual sexual relations: "Common to both," Gallop wrote, "is the assumption that

women do not know what we want, that someone else, in a position of greater knowledge and power, knows better” (p. 392).

Some feminist scholars theorize that sexual harassment in academia is part of a larger and more general misogyny (Paludi & Barickman, 1998). Sexual harassment of male students by female teachers appears to be relatively rare (Sandler & Shoop, 1997), although Gallop (1999) wrote vociferously about her numerous seductions of male students. Research studying the impact of sexual harassment on students has seemed to focus on females (Paludi & Barickman, 1998). Whereas 15% of men have been found to have experienced harassment in the workplace, that figure cannot be generalized to academic settings because there is limited research on male students and faculty (Dziech & Hawkins, 1998). The consequences of sexual harassment for male victims are often overlooked, say Dziech and Hawkins (1998), because of the prevailing belief that men respond favorably to being propositioned by women. This thinking has also been common in society’s reaction to male victims of sexual abuse by women – young girls get abused; young boys get lucky. In reality, some researchers on child sexual abuse have suggested, boys are less likely to report molestation due to distorted perceptions of their role in their own victimization (Hunter, 1990). Perhaps the same is true when male students are harassed by teachers. The acknowledgement of harassment of males by females notwithstanding, the problem of sexual exploitation of women by men does seem to be more widespread and represents a pervasive power disparity in our society. This vulnerability of female students may be especially important in social work programs, where 80% of MSW students are female (Congress, 1996).

As well, the U.S. Supreme Court has ruled that same-sex harassment is a form of discrimination that is protected under the Civil Rights Act ("Oncale v. Sundowner Offshore Services, Inc.," 1998). Students may be particularly reluctant to report same-sex harassment, however, because of fears of labeling or discrimination (Fineran, 2002).

From a macro point of view, sexual harassment affects not only individuals, but also the atmosphere and climate of an organization (Nicks, 1996). In a study of 56 faculty members at Oglethorpe University who were surveyed about their concerns about being accused of sexual harassment, 68% indicated some concern about being falsely accused, and 45% reported that they had changed their behavior because of that concern (Nicks, 1996). Male faculty members were more likely to be concerned and to have changed their behavior toward students.

Feminist theories describe how disparities in power between men and women have historically contributed to the sexual exploitation of women. Similarly, power differentials exist between social workers and clients, as well as between professors and students. It may be that this power disparity renders such sexual relationships intrinsically nonconsensual and potentially exploitative.

Consent

Unwanted or forced sexual activity clearly exemplifies a context in which consent is not given and would presumably be agreed upon as unacceptable by virtually all educators. Unlike sexual assault, however, sexual harassment implies a lack of consent which is murkier and more insidious. In fact, sexual abuse does not always occur in the absence of verbal consent (Freeman-Longo & Blanchard, 1998), but rather often represents a much more subtle form of coercion. Freeman-Longo (1998) distinguished consent from compliance, suggesting that one may submit to sexual activity for a multitude of psychological reasons, including as a desire to please, or to feel attractive, special and important. Thus, it becomes crucial to explore the meaning of consent, the capacity to consent, and the effect of a power differential on the legitimacy of the consent.

The meaning of consent

According to Merriam-Webster's dictionary, consent means "to give assent or approval; to agree." While this definition seems unambiguous, it may be more complex than it seems at first glance. In the case of child sexual abuse, for instance, it is commonly agreed that children cannot consent to sex with an adult (even when they agree to have sex), because they do not fully understand what is it they are consenting to (Finkelhor, 1984). Similarly, Freeman-Longo and Blanchard (1998) suggested that consent to sex implies an understanding of intimate relationships and their emotional impact, as well as knowledge of the possible range of positive and negative consequences that might result from engaging in sexual behavior. To consent, one must have true freedom to agree or decline, and the consent must not have been manipulated (Finkelhor, 1984).

Informed consent is discussed in NASW's *Code of Ethics* as including, among other things, a discussion of purposes, risks, limits, reasonable alternatives, the right to refuse or withdraw consent, the time frame covered by the consent, and an opportunity to ask questions (National Association of Social Workers, 1996). While this section of the *Code* refers to work with clients, informed consent can also apply to formal or informal contracts with students. The purpose of

informed consent in any context is to allow an individual to make an intelligent, informed choice after considering possible outcomes and alternative options (Parsons, 2001).

Thus, informed consent to a sexual relationship between student and teacher implies that the professor (being the professional and the more powerful partner) has explicitly informed the student of the purpose of the sexual relationship, the possible negative and positive outcomes of such a relationship, the limits of the relationship, the student's right to refuse or withdraw agreement, the alternatives that exist, and the potential effects of the relationship on the student and others (e.g. classmates). The informed student has been given ample opportunity to explore the possible ramifications of entering into this sexual relationship and to weigh the pros and cons of the decision.

Capacity to consent

The capacity to give informed consent requires competence (Lowenberg & Dolgoff, 1992). Competence refers to one's ability to make informed decisions in one's own best interest (Parsons, 2001). Age is one measure of competence, and in general, the law does not recognize minors as competent to give consent or enter into contracts. More specifically, all states have laws prohibiting sexual contact with minors. Although most college students and graduate students are chronologically and legally defined as adults, a student's adulthood does not by definition imply capacity to consent because of the power disparity between student and teacher (Paludi & Barickman, 1998). Age can, however, be an additional source of power differential when seduction of a young adult by a much older professor occurs.

Competence can also be impaired by emotional factors (Parsons, 2001). Students experiencing sexual attention by professors are clearly faced with the stress of coping with the potential array of threats or gains they envision as a consequence to their positive or negative response to the faculty member's affection. This stress may interfere with the ability to make a sensible decision. On the other hand, the euphoria created by infatuation may also interfere with a student's ability to make a sound decision.

Legitimacy of the consent

Legitimate consent is given freely, without manipulation or pressure (Finkelhor, 1984), and may be compared to the social work value of self-determination (National Association of Social Workers, 1996).

Self-determination refers to autonomy and emphasizes the client's right to actively participate in decision making (Parsons, 2001). Despite the appearance of a student's self-determination in consensual sexual relationships, however, Congress (1996) states, "often a veiled element of coercion exists, and the presence of knowledge and volition can be questionable" (p. 333).

It has been argued that relationships between teachers and social work students are always ultimately coercive (Congress, 1996). Stamler and Stone (1998) concurred that because faculty-student relationships are not between equals, they cannot be consensual, although students may perceive relationships with professors to be mutual and consensual. Glasser and Thorpe (1986) found, in their survey of psychology graduate students, that 51% of those who had engaged in sexual relations with a faculty member reported, in retrospect, seeing some degree of coercion in the relationship.

Students are fundamentally vulnerable to coercion as a result of their dependency on professors for grades, evaluations, recommendations, and support (Congress, 1996). Furthermore, the classroom is a hierarchy in which the teacher holds the power and there exists a culture of deference (Stewart, Bridgeland, & Duane, 1998). Because the teaching relationship is a helping relationship, it is unbalanced in both power and dependency, creating the potential for exploitation.

Students may feel powerless to resist sexual advances and assert the right to say no. Because the professor's intentions may initially be unclear, the student may passively resist by attempting to ignore the seduction or, in some cases, blame oneself for unintentionally inviting or encouraging the advances (Paludi, 1990). Students may fear retaliation and go along with the seduction, and it has been found that the potential for retaliatory harassment increases when the relationship ends (Paludi & Barickman, 1998). In the majority of cases, students avoid confronting the professor or reporting the incident (Paludi & Barickman, 1998; Sandler & Shoop, 1997).

In general, the dynamics of these relationships call into question the legitimacy of consent. Can an individual who is dependent on another truly and freely decline to participate in some aspect of the relationship? Or does the dependency, by definition, negate the ability to equally participate in relationship decisions? Does what appear to be consent therefore more closely resemble, in many cases, acquiescence? Sexual harassment rarely involves violence or overt force and professors may need not threaten or bribe students to attain compliance. The dynamics of most

sexually exploitative encounters are much more insidious, and, in the case of the professor and student, the relationship, ironically, may be meeting important student needs for attention, validation, and acceptance. This grooming of the student by giving special attention, confirmation, and affirmation can easily manipulate the student into compliance and may create only a false illusion of consent.

Furthermore, because these relationships are often kept secret, they isolate the student and limit social support when the relationship ends (Stamler & Stone, 1998). Often, other faculty or students are aware of the sexual relationship but look the other way because of their perceptions that both parties are consensual adults. These secretive sexual relationships are sometimes analogous to incestuous molestation in which family members know about child sexual abuse but ignore it or refuse to intervene (Congress, 1996). The notion that some young women feel powerful because they have seduced their teachers (Gallop, 1999; Stewart et al., 1998).

The other side of the consensual-relations debate

The relatively recent movement to include consensual relationships as part of the definition of academic sexual harassment has been met with some resistance (Paludi & Barickman, 1998). For example, a survey of deans of U.S. schools of social work reported that most social work deans did not feel that CSWE should play a role in managing sexual relationships between students and faculty (Singer, 1994). Perhaps the most vocal advocate of consensual relations between students and educators has been Jane Gallop, a feminist researcher and professor who was herself accused of sexual harassment. While she conceded that students and teachers are unequal in their power in the educational relationship, Gallop questioned whether it necessarily follows that the student is unable to consent to a sexual relationship (Gallop, 1999).

It is true that in some cases, students do welcome sexual attention and perceive themselves as consenting to an amorous relationship with a professor. Contrary to the stereotypical “lecherous professor,” a recent study (Marchen & DeSouza, 2000) seemed to support Gallop’s assertion that students are often the initiators in sexual relationships with faculty members. In their survey of 54 faculty members, Marchen and DeSouza (2000) found that about 53% reported experiencing sexual advances by students. Although female faculty reported more unwanted sexual attention than males and seemed to find these experiences more threatening or uncomfortable, both genders reported sexual overtures with about the same frequency.

Reflecting on her seduction of two of her own graduate school professors, Gallop (1999) suggested that their power over her was not by virtue of their institutional position, but of their knowledge and intellectual passion. She maintained that she initiated the sexual affairs to see them "as other men" (p. 393), and that far from disempowering her, the seduction allowed her to feel the power of her own sexuality. Gallop proposed that these experiences offer students opportunities to neutralize power imbalances, to be "bold and forceful," to feel "desirable," and to view the world as a place of "diverse possibility" (P. 396). Desire can increase a student's drive and energy, Gallop wrote, and she added that being an "object of desire" can make one feel "wanted, worthy, and lovable" (p. 396).

Gallop (1999) agreed that true sexual harassment creates an environment that is hostile to a student's education. She countered, however, that consensual sex between teachers and students can be conducive to one's education and create an atmosphere in which intense personal contact can enhance the desire to learn and excel. Sharing the passion of mutual intellectual exploration, the couple develops a depth of intimacy that ultimately is expressed in sexuality. The student becomes even more driven to impress the professor, Gallop (1997) argued, perhaps providing additional motivation and inspiring creativity and, ultimately, success.

Other critics of sexual harassment policies argued that universities have begun to take sexual behavior more seriously than they do other forms of professional misconduct, distorting both the prevalence and importance of the problem (Dilger, 1998). Roger Howe, a Yale professor (quoted in Dilger, 1998), suggested that in most sexual harassment cases, professors cross a "gray line" without understanding the seriousness or the implications, and that once it is brought to their attention, most will not repeat the behavior. Many professors accused of sexual misconduct in academic settings believe that they were denied due process and viewed as guilty until proven innocent (Dilger, 1998). As with most sex crimes, an "acquittal" does not undo the presumption of guilt, and allegations may continue to affect an academic career long into the future, regardless of the circumstances of the alleged incident or the investigative findings. Criminalizing love affairs, some say, inadvertently results in the victimization of those identified as perpetrators (Dilger, 1998).

Toobin (1998) discussed the costs of policing consensual sex between teachers and students. Of utmost concern, he suggested, is the application of rules of misconduct to what he

calls a victimless crime. Other considerations include the fiscal costs of litigating consensual sexual relations cases, both in administrative hearings pertaining to the disciplinary action against the professor as well as in lawsuits that professors may initiate against the university that sanctions them. Moreover, the potential losses incurred by the university that suspends or fires a productive research professor may outweigh the risks of recidivism. Finally, the identity of the “victim” may be exposed by universities that take action against faculty members, causing more emotional distress than was caused by the sexual behavior itself (Toobin, 1998).

Gallop further argued that prohibitions against consensual relations between students and instructors are based in the puritanical philosophy of sex as inherently bad. The ban on consensual sexual relations is dehumanizing, Gallop (1999) suggested, because it limits and restricts individuals' interactions. Others concur that regulation of consensual personal relationships threatens our right to privacy and "reflect[s] the childish belief that there is a political solution, and a public policy, for every interpersonal problem" (Kaminer, 1995, p. 141). Dilger (1998) reported that many agree that consensual relations restrictions are draconian, because they apply to graduate students who are old enough to consent. The interference between two adults who are attracted to each other is seen as moralization about sexual behavior rather than as a genuine attempt to protect vulnerable individuals from conflicts of interest.

These arguments might be seen as consistent with the social work value of self-determination. As social workers, it could be argued, we empower clients (and students) to make informed choices, and institutions that eliminate choice through oppressive or inflexible policies infringe on the right to self-determination. Sandler and Paludi (1993) argued, however, that whenever one person, by virtue of the nature of the relationship, exerts power over another, the potential for abuse and exploitation is high, and therefore protections must exist. The disparity of power is what renders the relationship, by definition, non-consensual (Sandler & Paludi, 1993).

Sexual Relations Between Faculty and Students: A Dual Relationship

Whether or not we believe that students have the capacity to consent to sex with a teacher, it seems clear that romantic relationships between faculty and students create a conflict of interest and constitute a dual relationship. Dual relationships are described as those in which the professional has two or more overlapping roles (Parsons, 2001). Dual relationships lead to boundary confusion because roles become unclear, and any departure from accepted professional

roles can become problematic (Parsons, 2001). The inappropriate sexualization of an otherwise non-sexual relationship violates the safety of the relationship by altering the boundaries and creating ambiguous expectations (Peterson, 1992). Boundary violations undermine the primary relationship and permit an abuse of power (Kagle & Giebelhausen, 1994). Furthermore, boundary violations create a situation in which the professional's needs are being met at the other's expense (Peterson, 1992).

Perhaps nowhere in academia are the issues of dual relationships more salient than in social work education. Teachers influence students with their behaviors as well as their instruction (Congress, 1996) as they model empowerment, self-determination, advocacy, and other social work concepts referred to throughout the NASW *Code of Ethics*. The *Code of Ethics* (National Association of Social Workers, 1996) charges that professional social work educators should "...not engage in any dual or multiple relationships with students in which there is a risk of exploitation or potential harm to the student ... [and] are responsible for setting clear, appropriate and culturally sensitive boundaries" (section 3.02). Congress (1996) noted that it is always the responsibility of the professional to critically assess the risk of harm in dual relationships.

Interestingly, Congress (2001) reported that although most social work educators (98.9%) reported that sexual relationships with current students are unethical, less than 30% believed that sexual relationships with former students was unacceptable. It may be that many respondents did not believe that the ethical standard prohibiting sexual relations with former clients applies to relations with students, who have completed their education and are therefore unlikely to return to seek further services from the faculty member (Congress, 2001).

Conflicts of interest are inherent in extracurricular teacher/student relationships. The issue of fair grading by the professor of the student is one potential problem, as is the perception of favoritism and nepotism (Paludi & Barickman, 1998). Although graduate education has become less formalized and more collegial, any dual relationship, particularly a sexual one, will likely hinder an educator's ability to evaluate and grade impartially (Congress, 1996). This loss of objectivity may also create feelings of resentment among other students in the classroom.

Some students may enter into relationships with faculty because they are flattered by the attention from an older professor for whom they have high regard (Sandler & Shoop, 1997). Paludi and Barickman (1998) asserted, however, that a faculty member's relationship with a student

involves emotional complexities not unlike those that occur in a therapist/client relationship. Most powerful are the dynamics of student vulnerability that occur as a result of the professor's capacity to enhance or diminish students' self-esteem (Stamler & Stone, 1998). This analogy to the therapist/client relationship is especially meaningful to social work educators, because they strive to help students understand the importance of establishing and maintaining worker-client boundaries that promote healthy interpersonal patterns. Because helping relationships are client centered, and teaching relationships are student centered, the parallel process can be an important experiential learning tool and model for students.

The nature of the relationship between student and professor is that the student is dependent and therefore vulnerable. Students, like clients in helping relationships, look to the professional to establish the boundaries of the relationship in order to maintain trust (Stewart et al., 1998). Peterson's (1992) definition of boundary violations in higher education is strikingly similar to our concept of such violations in the helping professions: they are acts that breach the core intent of the relationship. When professors or social workers use the professional relationship to meet personal needs rather than student or client needs, the integrity of the relationship is compromised. Although it could be argued that the student (or client) also has sexual needs to which he or she may be responding, Stamler and Stone (1998) maintain that any personal interactions that create ambiguity and confusion are considered boundary violations.

In the context of education, sexual relationships confuse roles and alter the instructional atmosphere (Stamler & Stone, 1998). Rupert & Holmes (1997) asserted that dual relationships occur whenever individuals try to simultaneously fill two or more different roles, including non-sexual roles. The demands of role multiplicity create conflicts of interest and potential exploitation of the nonprofessional member of the relationship (Rupert & Holmes, 1997). Interestingly, despite the seemingly obvious conflicts involved, Rupert and Holmes (1997) found that out of the 239 universities they surveyed, more than 55% reported that they encouraged friendships with students, compared to only 6.3% that reportedly encouraged business relationships with students.

Implications for Social Work Education

In general, it seems prudent for social work faculty members to resist the temptation of engaging in sexual relationships with students. Social work professors, perhaps more than in other disciplines, inspire and motivate students largely by example, and should be held to a standard that

consistently demonstrates an appropriate degree of professionalism. In fact, an important skill for social work students to learn is the ability to convey genuineness, warmth, and compassion without inaccurately misrepresenting the relationship as something other than professional. Arguably, although the CSWE Curriculum Policy Statement (Council on Social Work Education, 2002) emphasizes the integration of social work values and ethics in the curriculum, the social work professor teaches these skills largely through interpersonal process rather than curriculum content.

While instructors are human, and learning is enhanced when students perceive teachers as genuine, students must be able to expect and trust that professors will set and maintain reasonable boundaries. At best, consensual sexual relationships create the appearance of impropriety, and at worst, they blatantly violate the professor's duty to the student, the university, and the community.

Because professors praise, criticize, evaluate, and recommend students, an inherent power differential exists within the context of the relationship. This power differential transcends other apparent equalities such as age, gender, ethnicity, and socioeconomic status, but in some cases, power disparity may be further exacerbated by those same characteristics. The asymmetric nature of the teaching relationship renders a student vulnerable to exploitation, and thus, as with clients in helping relationships, a student's voluntary consent to sex is intrinsically suspect.

Through the exploration and resolution of the ethical dilemmas that present themselves in professional practice, social work educators assist students to understand the importance of reaching solutions that recognize the needs of the client as paramount. A similar type of transference and countertransference that occurs in social worker-client relationships may occur in interactions between professors and students. In other words, students may attribute to professors' qualities that they admire in others or aspire to hold themselves. To use the student's awe of the professor's status or authority to suit the instructor's own needs contradicts the notion that social workers help others to process feelings rather than act on them.

Of course, there may be cases in which mature graduate students and their professors truly fall in love. In such instances, perhaps the sensible solution is to remove the potential conflict by terminating the teaching or supervisory relationship prior to consummation. It would be advisable, for example, for the student to withdraw from the course, or for the professor to resign from the advising committee.

The issue of dual relationships between faculty and students is particularly salient for social work educators, although there is a lack of research specifically addressing sexual harassment in social work education (Risley-Curtiss & Hudson, 1998). Dual relationships, which are unethical for social workers in general, create conflicts of interest that limit the professor's objectivity, confuse expectations for the student, and increase resentment for classmates. Because it is incumbent upon social work educators to help students understand the nature and conflicts of dual relationships, to engage in a dual relationship with a student would seemingly be contradictory. The ambiguity of the sexual relationship between teacher and student threatens the integrity of the educational process and diminishes the authority and accountability of the faculty member. Ultimately, these relationships undermine the spirit of mentorship and detract from the primary role of the educator, which is to facilitate the achievement of the students' learning objectives.

Professional social workers should be especially sensitive to the implications of oppression, exploitation, and victimization. We are trained to recognize and respond to abuses of power and to advocate for and empower vulnerable individuals. Although we are not, of course, above reproach, we should model for our students the type of responsible and fair authority with which we expect them to serve their clients.

References

- American Association for Marriage and Family Therapy. (1998). *AAMFT code of ethics*.
- American Counseling Association. (1996). *ACA code of ethics and standards of practice*.
- American Psychological Association. (1995). *Ethical principles of psychologists and code of conduct*. Washington, DC: Author.
- Brownmiller, S. (1975). *Against our will: Men, women and rape*. New York: Bantam Books.
- Chancer, L. S. (1998). *Reconcilable differences: Confronting beauty, pornography, and the future of feminism*. Berkeley: Univ. of Calif. Press.
- Congress, E. P. (1996). Dual relationships in academia: Dilemmas for social work educators. *Journal of Social Work Education*, 32(3), 329-338.
- Congress, E. P. (2001). Dual relationships in social work education: Report on a national survey. *Journal of Social Work Education*, 37(2), 255-266.
- Council on Social Work Education. (2000). *Statistics on Social Work Education in the United States: 2000*.
- Council on Social Work Education. (2002). *Curriculum Policy Statement*. Retrieved 12/9/02, 2002, from www.cswe.org
- Dilger, P. (1998). Putting an end to risky romance. In Aminzade (Ed.), *The social worlds of higher education*. Thousand Oaks, CA: Pine Forge Press.
- Dworkin, A. (1974). *Woman hating*. New York: Dutton.
- Dziech, B., & Weiner, L. (1984). *The Lecherous Professor*. Boston: Beacon Press.

- Dziech, B. W., & Hawkins, M. W. (1998). *Sexual harassment in higher education: Reflections and new perspectives*. New York: Garland.
- Evans, D. R., & Hearn, M. T. (1997). Sexual and non-sexual dual relationships: Managing the boundaries. In D. R. Evans (Ed.), *The Law Standards of Practice, and Ethics in the Practice of Psychology* (pp. 53-84). Toronto, Canada: Edmond Montgomery Publications.
- Fineran, S. (2002). Sexual harassment between same-sex peers: Intersection of mental health, homophobia, and sexual violence in schools. *Social Work, 47*(1), 65-74.
- Finkelhor, D. (1984). *Child sexual abuse*. New York: The Free Press.
- Fitzgerald, L. F., Shullman, S. L., Bailey, N., Richards, M., Swecker, J., Gold, Y., Ormerod, & Weitzman, L. (1988). The incidence and dimensions of sexual harassment in academia and the workplace. *Journal of vocational behavior, 32*, 152-175.
- Freeman-Longo, R. E., & Blanchard, G. T. (1998). *Sexual abuse in America: Epidemic of the 21st century*. Brandon, VT: Safer Society Press.
- Gallop, J. (1999). Consensual amorous relations. In Pescosolido & Aminzadeh (Eds.), *The social worlds of higher education* (pp. 389-399). Thousand Oaks, CA: Pine Forge Press.
- Gibelman, M., & Schervish, P. V. (1993). The glass ceiling in social work: Is it shatterproof? *Affilia Journal of Women and Social Work., 8*(4), 442-455.
- Glasser, R. & Thorpe, J. (1986). Unethical intimacy: A survey of sexual contact and advances between psychology educators and female graduate students. *American Psychologist 41*, 43-51.
- Hunter, M. (1990). *Abused boys: The neglected victims of sexual abuse*. Lexington, MA: Lexington Books.
- Kagle, J. D., & Giebelhausen, P. N. (1994). Dual relationships and professional boundaries. *Social Work, 39*(2), 213-220.
- Kaminer, W. (1995). The privacy problem. In A. M. Stan (Ed.), *Debating Sexual Correctness*. New York: Dell Publishing.
- Landis-Schiff, T. (1996). Sexual harassment: Why men don't understand it. *Initiatives, 57*(2), 15-25.
- LeMoncheck, L. (1997). *Loose women, lecherous men: A feminist philosophy of sex*. New York: Oxford University Press.
- Lips, H. M. (1981). *Men, women and the psychology of power*. Englewood Cliffs, NJ: Prentice-Hall.
- Lowenberg, F., & Dolgoff, R. (1992). *Ethical decisions for social work practice*. Itasca, IL: Peacock.
- Marchen, J., & DeSouza, E. (2000). The sexual harassment of faculty members by students. *Sex Roles: A Journal of Research, 29*5.
- National Association of Social Workers. (1996). *NASW code of ethics*. Washington, D.C.: NASW.
- National Association of Social Workers. (2002). *NASW Practice Research Survey*. Retrieved 12/9/02, 2002, from <https://www.socialworkers.org/naswprn/demogr.pdf>
- Nicks, S. D. (1996). Fear in academia: Concern over unmerited accusations of sexual harassment. *Journal of Psychology, 130*(Jan), 79-82.
- Oncale v. Sundowner Offshore Services, Inc., 118 S. Ct. 998 (U.S. Supreme Court 1998).

- Paludi, M. A. (1990). *Ivory power: Sexual harassment on campus*. Albany: State University of New York Press.
- Paludi, M. A., & Barickman, R. B. (1998). *Sexual harassment, work, and education*. Albany: State University of New York Press.
- Parsons, R. D. (2001). *The Ethics of Professional Practice*. Needham Heights, MA: Allyn & Bacon.
- Peterson, M. R. (1992). *At personal risk: Boundary violations in professional-client relationships*. NY: Norton.
- Risley-Curtiss, C., & Hudson, W. W. (1998). Sexual harassment of social work students. *Affilia Journal of Women and Social Work*, Summer 1998(2), 190-211.
- Rubin, L. J., Borgers, S. B., & Tollefson, N. (1996). Sexual harassment in academia: Individual differences in student reporting behaviors. *Initiatives*, 57(3), 37-45.
- Rupert, P. A., & Holmes, D. L. (1997). Dual relationships in higher education. *Journal of Higher Education*, 68(6), 660-678.
- Russell, D. (1984). *Sexual exploitation: Rape, child sexual abuse and workplace harassment*. Beverly Hills, CA.: Sage.
- Sandler, B. R., & Paludi, M. A. (1993). *Educator's guide to controlling sexual harassment*. Thomson Publishing Group. Washington, D.C.
- Sandler, B. R., & Shoop, R. J. (1997). *Sexual harassment on campus: A guide for administrators, faculty and students*. Needham Heights, MA: Allyn & Bacon.
- Schank, B. (1994). Sexual harassment: Definitions, policy frameworks, and legal issues. *Sexual harassment and schools of social work: Issues, costs, and strategic responses*, 12- 24.
- Schneider, B. (1987). Graduate women, sexual harassment, and university policy. *Journal of Higher Education*, 58(46-65).
- Singer, T. (1994). Sexual harassment in graduate schools of social work: Provocative dilemmas. In N. Hooyman (Ed.), *Sexual harassment and schools of social work: Issues, costs, and strategic responses*
- Stamler, V. L., & Stone, G. L. (1998). *Faculty-student sexual involvement: Issues and interventions*. Thousand Oaks, CA: Sage.
- Stewart, C. S., Bridgeland, W. M., & Duane, E. A. (1998). Childhood sexual abuse and perceived professor harassment among college students. *College Student Journal*, 32(2), 240-254.
- Strauss, S. (1992). *Sexual harassment and teens: A program for positive change*. Minneapolis, MN: Free Spirit Publishing.
- Toobin, J. (1998). The trouble with sex. *The New Yorker*, March 1998.