SEXUAL CONSENT IN GREECE AND THE UNITED STATES:
A CULTURAL COMPARISON

A Dissertation
presented to
the Faculty of the Graduate School
at the University of Missouri-Columbia

In Partial Fulfillment
of the Requirements for the Degree
Doctor of Philosophy

by
SHANNISE BRIANNE LUEBBERING-JONES
Dr. Stephen Whitney, Dissertation Supervisor
DECEMBER 2023
The undersigned, appointed by the dean of the Graduate School, have examined the [thesis or dissertation] entitled

SEXUAL CONSENT IN GREECE AND THE UNITED STATES: A CULTURAL COMPARISON

presented by Shannise Brianne Luebbering-Jones,

a candidate for the degree of doctor of philosophy,

and hereby certify that, in their opinion, it is worthy of acceptance.

________________________________________
Professor Stephen Whitney

________________________________________
Professor Wes Bonifay

________________________________________
Professor Tony Castro

________________________________________
Professor Matt Easter
To Dr. Castro, thank you for your guidance and support throughout the last five years of work on this project. Without your dedication, patience, Star Wars references, and exquisite teaching style, this work would not have been possible. I will never be able to fully express my appreciation to you.

To Dr. Bonifay, I cannot express how appreciative I am to your for all of our philosophical conversations, for your down-to-earth nature, and your consistent belief in the importance of this research. I will always be grateful our paths crossed.

To Dr. Easter, I need you to know how deeply, sincerely thankful I am to have had the opportunity to be mentored by you. And to have had the opportunity to eat your cooking! Thank you for your patience and for tolerating my neurotic nature.

To Dr. Whitney, in true dissertation chair fashion, your support and guidance have propelled this work to completion. I am confident had you not been my advisor and chair, I would not have made it to this point in the process. For all of our in-depth discussions over tea, for all of your extreme patience, and for many other things that cannot be fully expressed in an acknowledgments section, I am eternally grateful.
# TABLE OF CONTENTS

ACKNOWLEDGMENTS ........................................................................................................ii
LIST OF ABBREVIATIONS ............................................................................................. iii
LIST OF ILLUSTRATIONS ............................................................................................... iv
ABSTRACT .......................................................................................................................... v

Chapter

I. Introduction ..................................................................................................................... 1
II. Literature Review .......................................................................................................... 14
III. Methodology .................................................................................................................. 34
IV. Results & Findings ...................................................................................................... 55
V. Discussion ...................................................................................................................... 98
VI. Reference List .............................................................................................................. 108
VII. Vita. ............................................................................................................................. 120
# LIST OF ABBREVIATIONS

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Meaning</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. STDs</td>
<td>Sexually Transmitted Diseases</td>
</tr>
<tr>
<td>2. STIs</td>
<td>Sexually Transmitted Infections</td>
</tr>
<tr>
<td>3. CGT</td>
<td>Constructivist Grounded Theory</td>
</tr>
<tr>
<td>4. POC</td>
<td>People of Color</td>
</tr>
<tr>
<td>5. Q+</td>
<td>LGBTQ+ Community</td>
</tr>
<tr>
<td>6. IPSV</td>
<td>Intimate Partner Sexual Violence</td>
</tr>
<tr>
<td>7. PCA</td>
<td>Principal Components Analysis</td>
</tr>
<tr>
<td>8. EFA</td>
<td>Exploratory Factor Analysis</td>
</tr>
<tr>
<td>9. MANOVA</td>
<td>Multivariate Analysis of Variance</td>
</tr>
<tr>
<td>10. SAS</td>
<td>Sexual Assertiveness Scale</td>
</tr>
<tr>
<td>11. BDSM</td>
<td>Bondage, Dominance, Sadomasochism</td>
</tr>
<tr>
<td>12. SCS</td>
<td>Sexual Consent Scale</td>
</tr>
<tr>
<td>13. SCS-R</td>
<td>Sexual Consent Scale-Revised</td>
</tr>
<tr>
<td>14. ICS</td>
<td>Internal Consent Scale</td>
</tr>
<tr>
<td>15. ECS</td>
<td>External Consent Scale</td>
</tr>
<tr>
<td>16. HIV</td>
<td>Human Immunodeficiency Virus</td>
</tr>
<tr>
<td>17. AIDS</td>
<td>Acquired Immunodeficiency Syndrome</td>
</tr>
<tr>
<td>18. FWB</td>
<td>Friends-with-Benefits</td>
</tr>
</tbody>
</table>
**LIST OF ILLUSTRATIONS**

<table>
<thead>
<tr>
<th>Figure</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Introductory Statement for Interviews</td>
<td>38</td>
</tr>
<tr>
<td>2. American model of consent</td>
<td>71</td>
</tr>
<tr>
<td>3. Greek model of consent</td>
<td>87</td>
</tr>
<tr>
<td>4. Greek subcategories</td>
<td>88</td>
</tr>
<tr>
<td>5. Convergence model</td>
<td>95</td>
</tr>
</tbody>
</table>
Abstract

Despite a growing, global social pressure to emphasize the importance of sexual consent, there remains a lack of empirical research into the topic. Though research into sexual consent is an expanding field, there are significant gaps in our knowledge in this important area. Very little work examines the context of sexual consent embedded within cultural factors or compares processes and perspectives on consent between cultures. As a result, there is little insight into how culture influences and shapes consent.

This study is an extension of a smaller study that focused on recognizing and understanding the nuances of sexual consent communication and interpretation among young adults in an American college setting. With this extension, interview data was collected from young adults in Greece. Using Constructivist Grounded Theory (CGT) methods, interview data from Greece and the United States were analyzed separately, and as one larger dataset. Theoretical models for each country’s data were generated through the constant comparative methods consistent with CGT. Comparisons between codes for each country were also made, resulting in an overarching theoretical model and a rich discussion section examining similarities and differences between and within Greece and the United States. The three main themes that emerged from the iterative comparison of all data were Socially Constructed Expectations, Catalyst to Sexual Activity, and Behavior Throughout Sexual Activity, which are all nested within one another and within consensual sex.
Chapter I: Introduction

This specific study originated from my thoughts and conversations surrounding an American court case surrounding sexual assault allegations. It was a classic ‘he-said-she-said’ situation playing out in court – one party claimed they had been assaulted, the other claimed they had engaged in consensual sex. The details surrounding the case were difficult to navigate, in part, because the case surrounded an incident that had happened several years prior to it being brought to court, and therefore there was no physical evidence to analyze. In the American court system, all defendants are presumed innocent until proven guilty. I began thinking about how I needed to assume that the male defendant in the case was innocent and being honest – but I could not assume that the victimized party was not also innocent and honest. As I toyed with these thoughts, I began to focus on one specific question: was it possible for both parties to be innocent and honest, with vastly different interpretations of their experiences? Was it possible that the male defendant truly felt that he had engaged in consensual sex with the female party making the allegations, while the female party simultaneously truly believed she has been sexually assaulted? If this were possible – how could these individuals have been on such vastly different pages?

These thoughts spawned a curiosity in me about what consent is – how is consent experienced, expressed, conceptualized, negotiated between people involved in sexual activity? I delved deep into academic literature about consent, trying to figure out what represented the essence of sexual consent. Surely, there had to be some empirical evidence that supported some model of consent to sex. However, as I spent hours searching through academic resources for research on the topic, I found that there was actually very little in existence. I struggled to find information on how the Affirmative Consent model was rooted in empirical data, I had difficulty finding terminology that was consistent across the few studies that had been conducted, and
ultimately realized that I’d stumbled upon what every researcher dreams of: a true gap in the literature.

**Positionality Statement**

Although the objective of most qualitative research is *not* objectivity, I must acknowledge and explore the lens through which this research is filtered. As a white, cis-gendered, heterosexual American female existing in the #MeToo era, it is impossible for me to view the concept of consent through an impartial lens. I cannot speak to the experiences of People of Color (POC), to the experiences of the Q+ community, to the experiences of non-Americans, or to the experiences of folks whose gender differs from my own. Each of those qualities plays a distinct role in how I perceive and filter data and information. Because women are more likely to experience non-consensual sexual contact and sexual coercion, I am incapable of broaching this topic without a sense of responsibility to protect others. However, POC and members of the Q+ community are also far more likely to experience sexual violence. Even though I inherently belong to one of the groups most victimized by sexual violence, I could not move through this research without acknowledging that sexual violence impacts all groups of people in many complex ways. Although I cannot escape my own place in America’s culture, I could take care to center the experiences and stories of folks who are both culturally similar and different to me.

Raised in America’s Bible Belt, my upbringing was shaped by Conservative Evangelical Christian beliefs surrounding sex. I was taught heteronormative, conservative sexual values: wait for sex until marriage, sex occurs only between one man and one woman, the purpose of sex is procreation, and similar ideas. My formative years were spent in a geographic location and era where sex education was practically
non-existent, and when it was present consisted of scare-tactics and abstinence-only theoretical underpinnings. Though I do not ascribe to these beliefs as an adult, they absolutely play a pivotal role in my beliefs and opinions on sex, sexuality, consent, and sex education. Despite data supporting many of my personal beliefs surrounding these topics, I must be transparent in acknowledging that my interpretations of the data collected in America and Greece were influenced by my upbringing and other cultural factors. To help balance this bias, I focused on remaining values-neutral throughout data collection, analysis, and the formulation of the written work. The purpose of this research is not to judge others’ values, or to force my own values onto the work, but to explore the realities of others’ experiences to generate a theoretical model representing consensual sexual processes.

As a person with prior non-consensual and consensual sexual experiences, the concept of consent is extremely important to me. My own experiences with consent deeply affect what consent is to me, and how I identify what constitutes consent in my professional roles. As a mother, I feel an immense sense of duty to empower my children with knowledge and skills, as well as to protect them, which also shaped my beliefs and opinions on topics like sex, sexual consent, and intimate partner sexual violence (IPSV). I could not remain impartial to experiences of sexual assault, coerced sex, or IPSV throughout this research. However, I worked to ensure that I approached this project's data collection and analysis phases with empathic neutrality.

As Patton (2002) described, empathetic neutrality approaches research with a neutral or non-judgmental mindset while maintaining and communicating a sense of understanding or empathy to participants. Empathic neutrality can help build rapport
during data collection, as well. In addition to utilizing empathic neutrality, I am open in my writing about my views, beliefs, stances, and biases. I took care to note each time I found myself reflecting on my own experiences or thinking impartially during data analysis, and re-reviewed data that I may have been biased in collecting or analyzing.

Much of the research in the literature review consisted of participants relaying information about consensual and nonconsensual sexual experiences. Some of the stories disclosed during interviews were also difficult to hear and revisit during analysis. At times, reading these tough stories became extremely emotionally taxing. I was cautious to pause further research into the topics when I recognized myself filtering this information through an emotionally charged lens or stepping outside of the realm of neutrality. After realizing I was no longer in a neutral mindset, I would journal my thoughts and feelings separately so that I could expel them and work through them. Then I would engage in self-care activities to deactivate my nervous system’s responses to triggering material and allow myself to take a break from the research work. I would not resume any work (literature review or data analysis) until I could approach the topics in a healthy and neutral way. These actions served not only to protect myself from burnout, but also to ensure I was reporting each study with fidelity, and limited levels of bias.

In addition to taking these steps, I was also cautious to annotate disparities in the existing research. I intentionally scanned the literature for information on non-white, non-cisgendered, non-heterosexual participants. I sought to recognize how people from demographic groups that differ from my own were represented and acknowledged in prior research. Though I did not target any specific group during data collection, I did work to ensure that participants in my study were empowered with the ability to describe themselves as they found most appropriate and
Sexual Consent in Greece and the United States

necessary. Participants in both samples were asked all demographic questions in an open manner and were not provided a list of options to conform to when describing themselves. All participants in both samples were fully in control of the data they brought to this study and were encouraged to disclose only what they felt comfortable with sharing. Participants were actively reminded they could stop at any time and could opt out of any questions they wished to not answer.

**Terminology Disclaimer**

As times change, terms change with them. As I move through the research in the literature review, there may be conflicting or outdated terminology utilized. I use these terms with intent. Any outdated terminology used is a direct reflection of the time in which the study was written. For example, some studies in the literature review were written in an era where the proper terminology for Sexually Transmitted Infections (STIs) was Sexually Transmitted Diseases (STDs). To remain consistent with the research being discussed, I use the same terms that were written in the research, rather than assuming that the terms used then should be updated to match terms now. One primary area that outdated terminology may be noticed is within the realm of gender and gender identity. Despite expanding understandings of gender, sex assigned at birth, gender identity, and gender expression, I match the terms used in the research I discuss to avoid confusion and maintain fidelity to the study. I perceive that it would be shortsighted to assume that participants providing their ‘Gender’ in a study from the 1990s would be providing gender identity or sex assigned at birth – I simply cannot speak to how participants in previous eras would have interpreted this at that time. It is not my place to make those assumptions.

Moving forward into my own research, terms used to describe participants’ experiences or demographics are the terms coming directly from the participants. All questions that participants
Sexual Consent in Greece and the United States were asked about their demographics were open-ended to their responses during their interviews. The participants in both the Greek and American samples were verbally asked for this in an open-ended manner to provide space for them to describe themselves through their own paradigms and perspectives. When a participant provides their gender, it is from their own perspective – if a person in this study described themselves as ‘male’, both interviewers took that description at face-value, and did not press for further details. The same is true of all demographics – from sexual orientation, to age, to race and religion, participants had the power to describe themselves in whatever way they found most appropriate. Throughout the interviews, participants in this study maintained control over the information they provided. This was essential to ensuring that the data generated from these interviews was fully embedded within the participants’ experiences, and thus their realities.

There are also times throughout this work where I vacillate between describing this study as a singular effort and a group effort. The original idea for the study, and the research design, were mine. Collaboration with my Greek coresearcher, faculty advisors, my dissertation chair, and undergraduate research assistants in the United States were crucial to shaping the project. Terms such as “I”, “we”, and “the research team” refer to myself and all the collaborating individuals who were part of this research.

**Overview of Consent Research**

Sexual consent cannot be fully understood without also acknowledging and understanding non-consent. The first research that approached exploring consent to sex was a study in the 1950s on college women’s experiences of coerced sex (Kirkpatrick & Kanin, 1957). During the sexual revolution in 1970s America, more and more research would come forth exploring sexual assault rates on college campuses (Simon & Gangon, 1973; Kanin & Parcell, 1977; Koss & Oreso, 1982;
Muehlenhard & Linton, 1987). Amid the research on sexual assault, there were no studies that actually explored its converse – consensual sex.

In America, research in the 1970s to 1990s slowly started to explore the why behind sexual assaults. Throughout this time two primary theories emerged: sexual script theory and miscommunication theory. Sexual script theory, first introduced in 1973, was an attempt to explain how individuals develop an understanding of processes of sexual activity (Simon & Gangon, 1973). Sexual script theory put forth the idea that people operated on scripts to understand how to navigate sexual activity, and that these scripts were shaped by gender roles and other socialized mechanisms (Simon & Gangon, 1973). Miscommunication theory was borne of sexual script theory and purported the idea that because of highly gendered sexual scripts, men and women approach communicating about sexual activity in vastly different ways (Maltz & Borker, 1982; Tannen, 1991; Gray, 1992). These great differences in men and women’s ideas of how to communicate about sex result in miscommunications between men and women such that each party may have differing perceptions of what activities were wanted and what activities were not wanted. As a result of these different socialized communication styles and expectations, many studies found that men tend to overestimate women’s level of sexual interest (Maltz & Borker, 1982; Tannen, 1991; Gray, 1992; Abbey 1982, Abbey et al.,1987; Mettz & Spitzberg, 1996; Bondurant & Donat, 1999; Perilloux & Buss, 2012). Additional studies emerged that proposed the idea of token resistance: the concept that women are sexual gatekeepers and men are ‘always on’, always ready for and consenting to sex (Check & Malamuth, 1983; Muehlenhard & Hollabaugh, 1988; Muehlenhard & McCoy, 1991).

While the studies concerning sexual script theory, miscommunication theory, and token resistance attempted to explain occurrences of sexual assault and coercion, other researchers
believed these explanations fell short. In the American research sphere in the 1990s and early 2000s, new ideas were being generated that challenged notions of token resistance and other preceding concepts. Hickman and Muehlenhard’s groundbreaking 1999 study completely obfuscated miscommunication theory. Their findings indicated that men and women recognize and understand cues of consent to sex quite similarly (Hickman & Muehlenhard, 1999). This study marks the dawn of researchers beginning to explore the concept of sexual consent.

From 1999 on, researchers began formulating studies designed to craft a full understanding of sexual consent. Evidence started to surface that explored how men and women communicate and interpret signals of consent that dug deeper into what specific signals of consent were present during sex (Muren et al., 1989; Crawford, 1995; Kritzinger & Firther, 1999; ). Research probed further into verbal and nonverbal communications of consent and assent and showed the complexity and nuance present in sexual consent negotiations (O’Sullivan & Byers, 1992; Shotland & Hunter, 1995; Muehlendard & Hollabaugh, 1998; Muehlenhard & Rodgers, 1998; Hall, 1998; Hickman & Muehlenhard, 1999; Humphreys, 2000; Adams-Curtis & Forbes, 2004; Beres et al., 2004; Herold & Maitland, 2004; Beres, 2010; Jozkowski, 2011; Jozkowski et al., 2014; Schumich & Fiscer, 2018; Marcantonio, Jozkowski, & Lo, 2018). Further research depicted how consent was influenced not only by external expressions but also by internal states (O’Sullivan & Gaines, 1998; Muehlenhard & Peterson, 2005; Peterson & Muehlenhard, 2007; Beres, 2010; Muehlenhard et al., 2016).

North American research dominates the existing literature on the topic. There is a distinct scarcity of consent research from other countries to such an extent that finding empirical information on consent in Greece was nearly impossible. Even research exploring sexual assault in Greece was challenging to find. Most Greek information discovered about sexual assault,
sexual violence, and sexual consent was found from sources reporting on the entire European Union.

According to the European Commission’s Institute for Gender Equality, approximately 25% of women in Greece have experienced sexual violence (2016). Statistics depicting sexual violence in Greece for people of all genders were difficult to find in academic literature; however, the European Institute for Gender Equality’s Gender Statistics Database provided some insights. Men are more often perpetrators of rape than women, while women are most often victims of rape than men in Greece (European Institute for Gender Equality, 2023). No data were available in this database that explored statistics on people of other genders, or by sexual orientation. Although data were accessible for respondent’s age, there was not data available to describe whether a respondent was a college student. Aside from this data, there were no Greek research articles found concerning sexual assault or sexual consent among college students. Dworke, Krahe, and Zinzow (2021) conducted a systematic review of the prevalence of sexual assault worldwide between 2010 and 2021 and found that the only studies focusing on sexual assault prevalence among college students were conducted in the United States. None of the studies reviewed in their work were from Greece, despite their efforts to explore sexual assault prevalence research across Europe (Dworokin, Krahe, & Zinzow, 2021).

Research focused on sex education in Greece and America, however, does exist. These studies demonstrate cultural similarities in attitudes towards sex and sex education between the two countries that could shed insight into overarching cultural climate surrounding sex. In a Greek study from 2007, Kirana and colleagues examined parent attitudes towards sex education and found that most parents thought sex education should begin prior to adolescence but felt that school was an inappropriate place for sex education to occur (Kirana, Nakopoulou, Akrita,
Sexual Consent in Greece and the United States

Papahantou, 2007). Since the early 1910s, sex education has been a debate in America among politicians, parents, philosophers, and other professionals (Huber & Firmin, 2014).

In the United States, only thirty-nine of fifty states have some form of mandatory sex education requirements, but these requirements are determined by each state and can be vastly different from one another (Guttmacher Institute, 2023). Only twenty-five states mandate both sex and STI/HIV education; other states either mandate only one or the other or have no mandated sex education. Furthermore, the guidelines for what sex and/or STI/HIV education must adhere to are also vastly different. Some states require this type of education to be evidence-based, medically accurate, culturally and age appropriate. Other states only require some of those aspects, and some states that do mandate sex education require none of those terms. Only eleven states in the U.S. require consent be included as a topic in sex education curriculum (Guttmacher Institute, 2023).

Sex education was not required in schools at all in Greece until the 2021-2022 academic year, according to a 2021 article released in Kathimerini, an Athens-based newspaper (Kathimerini, 2021). The article discloses that Educational Commissioner Niki Kerameus would be requiring ‘Skills Workshops’ as a compulsory component of education in the 2021-2022 academic year; included in these workshops would be sex education content (Kathimerini, 2021). It seems that prior to this, and certainly prior to 2014, sex education was in no way compulsory in Greek schools. In a Greek research review centered on sex education and the behavior of adolescents, authors note that sex education “is still not included as a compulsory course” in Greek schools (Vassilikou & Ioannidi-Kapolou, 2014). No information was found concerning specific requirements of sex education curriculum in Greece, nor focusing specifically on consent.

The disparities in research focused on sexual consent, sexual violence, and sexual violence
Sexual Consent in Greece and the United States

prevention between Greece and the United States is startling. Though more research on these topics has been conducted by American researchers, there is still lingers a lack of empirical information that could be used pragmatically to inform policy and education. As such, it appears that studying consent in both Greece and America is of great importance and significance. Furthermore, a cultural comparison on sexual consent could provide deep insight into how to approach the topic of consent in a more culturally cognizant manner, foster a deeper understanding of how consent negotiations occur in authenticity, and could help identify culturally significant characteristic of consent needed to engage in education efforts in more meaningful ways.

To fully embrace the distinct gravity that encompasses cross-cultural research, I find it best to start with this quote from Stevi Jackson and Petula Sik Ying Ho’s 2018 article Traveling Conversations: Cross-cultural Collaboration and the Globalization of Sexuality Studies: “Working collaboratively across cultures has broadened our understanding of the complexity of the everyday and sensitized us to the importance of thinking not only about cultural differences but the material socio-economic conditions and political circumstances in which sexual lives are lived (Jackson & Ho, 2018).” Cross-cultural research is highly important to understanding not only cultures with which we are unfamiliar, but also those cultures in which we are embedded. Additionally, cross-cultural studies afford the opportunity to not only address cultural differences, but cultural similarities amongst concepts (Jackson & Ho, 2018). Uniquely, cross-cultural research can bring forth differences in ideas and conceptualizations that provide insight into behavior, offering wisdom into cultural practices (Brislin, 1978).

**Problem Statement & Justification for Study**

When reviewing the guidelines for sex education in both Greece and the United States, sex
education in both countries is clearly neither comprehensive nor equally accessible for youth in these countries. The statistics surrounding sexual assault and sexual violence in both countries are alarming. Though there appears to be more research on sexual assault prevalence and prevention in the United States than in Greece, the demand for research exploring sexual consent is high. This begs many questions, among them two prevail: could teaching consent negotiation skills help reduce the rates of sexual assault in both countries? If so, what is consent, and how do we teach it? Are there culturally significant mechanisms behind consent negotiation, communication, and interpretation?

My study aims to be one step towards addressing these questions by gathering insight into what constitutes and comprises consent to sex for young adults. Given that there limited research into how the phenomenon of consent is experienced culturally, it is necessary to first explore this question before moving on to addressing how consent skills can be taught. To this end, this Constructivist Grounded Theory study gathers data from young adults in Greece and the United States about their personal experiences communicating, negotiating, and interpreting consent to sex. To achieve this goal, participants were interviewed about personal, in-person sexual experiences and asked questions intended to draw forth integral information about how they navigated consent. Participants engaged in a semi-structured interview process where they had complete control over the information presented. Ensuring that participants had full control over the information they shared, as well as engaging in semi-structured interviews, allowed the research team to elucidate cultural similarities and differences. Researchers were able to craft in-the-moment questions with finesse to collect clearer understanding of participants’ meanings and attain constancy to that meaning during data analysis. Interview data was coded using the iterative process of constant comparison, in accordance with CGT methodology. Results from this study
are presented through three different theoretical models: one exploring consent in America, one describing consent in Greece, and one overarching model that aims to explain and describe what consent is cross-culturally.
Chapter II: Literature Review

While sexual assault prevention and the negative impacts of sexual assault are well-represented within research spheres, studies that examine and acknowledge sexual consent are relatively new. Despite incongruent understandings of what constitutes consent and a distinct paucity of empirical work examining consent, the very definition of sexual assault hinges upon a lack of consent (Hickman & Muehlenhard, 1999; Beres, Herold, & Maitland, 2004; Beres, 2007; Jozkowski & Peterson, 2013; Jozkowski, et al. 2014; Muehlenhard, et al. 2016; Marcantonio et al., 2018; Shumlich & Fisher, 2018). Additionally, many attempts to measure consent are not well validated, further creating complexities in conceptualizing consent. Some definitions of sexual consent do not contain any specific behavioral components that can be utilized in an applied, rather than theoretical, manner. Many studies that have approached the topic of consent used written, fictitious vignettes to assess whether participants viewed interactions as consensual or not from an outsider’s perspective. This method of studying consent falls short because it fails to provide an accurate, in-depth assessment of an individual’s authentic experience (Beres, 2010).

Other researchers have attempted to generate scales that measure consent. Some of these scales were founded in heteronormative ideals and theoretical frameworks that inaccurately depict the realities of sexual consent negotiation. The social construct of sexual consent has morphed and changed throughout the last fifty years, yet it is still not clearly understood. Research on consent is typically conducted using college students. The predominant views on consent are couched within heterosexual relationships, women's rights, and college campus assault prevention, leaving out large
groups of other populations also impacted by sexual assault. Similarly, sex education in the United States rarely includes information on sexual consent. Most education on consent in the U.S. begins in college, primarily emphasizing sexual assault prevention and bystander intervention strategies. Sex education in Greece faces similar challenges, with sex education being controversial and only recently required in schools.

**Sexual Assault Research in the United States**

Sexual assault prevention efforts in America seem to have sprung from the 1970s sexual revolution and efforts to empower women’s sexuality. However, this is not the whole truth. As Carol May mentions, sexual assault prevention picked up steam during the dawns of the Civil Rights Movement, partly because of Rosa Parks's efforts in the rape trial of Recy Taylor (May, 2018). In the 1970s, similar movements grew, as did public awareness of sexual assault.

Though the history of sexual assault prevention programming is unclear, the 1970s introduced the first rape crisis intervention centers (May, 2018). The Violence Against Women Act was passed in the United States in 1994 (Meyer, 2000). By the 1990s, many sexual assault prevention programs existed, though most were not rooted in empirical evidence or scrutinized for their effectiveness (Yeater & Donahue, 1999).

Sexual assault alarmingly affects college campuses, with 1 in 5 women experiencing sexual assault before graduation (Cantor et al., 2015; Krebs et al., 2016). Landmark studies into coerced or forced sexual activity on college campuses began as early as 1957, with Kirkpatrick and Kanin reporting that over half of the nearly 300 women they sampled had experienced coerced sexual experiences. In the three decades following that crucial research, others found similar results: college women were experiencing
unwanted sexual contact in some form at alarming rates (Kirkpatrick & Kanin, 1957; Kanin & Parcell, 1977; Koss & Oros, 1982; Muehlenhard & Linton, 1987). Nevertheless, despite research into unwanted, non-consensual sexual contact, there was limited (if any) research into consent or prevention.

**Miscommunication Theory, Sexual Script Theory, & Token Resistance**

Nearly thirty years after the first impactful study depicting what a problem unwanted sexual contact on college campuses was, researchers began to broach the issue of *why*. The 1980s and 1990s gave rise to a theory that attempted to explain the prevalence of unwanted sexual contact: miscommunication theory. The premise of miscommunication theory is that men and women come from differing sociocultural backgrounds, resulting in differing communication styles, thus perpetuating miscommunication (Maltz & Borker, 1982; Tannen, 1991; Gray, 1992). When applied to the context of heterosexual situations, concerns surrounding sexual assault are whittled down to mere errors or accidents for which the primary solution is to enhance communication between men and women.

As miscommunication theory expanded, theorists sought to understand the differences in communication surrounding sex. These attempts may likely have been with good intent; however, the culminated results of these studies veer into victim blaming, especially when taken in the current context of movements like #MeToo. A consistent finding from this era of literature noted that men tend to overestimate women's sexual interest, sometimes conflating mundane behaviors or friendliness with a flirtatious sexual cue (Abbey 1982, Abbey et al.,1987; Mettz & Spitzberg, 1996; Bondurant & Donat, 1999; Perilloux & Buss, 2012). Kitzinger & Frith (1999) found that women tend to express their non-consent in primarily passive and non-verbal ways, which can be construed as an unclear signal; however, the authors make a clear
argument that communication is far more complex and nuanced than verbal responses alone. Thus, consent cannot be reduced solely to verbal cues or non-verbal cues. Furthermore, throughout research on unwanted sex in the 1980s and 1990s, there are references not only to men's over-perception or misinterpretation of sexual interest cues, but also to women's lack of assertiveness and clarity when refusing sex (Muren et al. 1989; Crawford 1995).

Related to the idea that women are unclear in their rejections of sexual advances is the concept of token resistance. The general idea of token resistance is akin to the colloquial notion that women often play hard to get – or reject sexual advances when they want the pursuer to continue (Check & Malamuth, 1983; Muehlenhard & Hollabaugh, 1988; Muehlenhard & McCoy, 1991). While some studies from this time confirm the idea that women sometimes engage in token resistance, other studies from the same era offer alternative suggestions for this behavior. For example, researchers have posited that women may say no to sex initially, then have a change of heart and decide they do want to continue with the activity; others theorize that women may say no initially out of concern that they may be labeled promiscuous if they appear too eager to engage in sex (Shotland & Hunter, 1995; Muehlenhard & Hollabaugh, 1998; Meuhlenhard & Rodgers, 1998).

Token resistance is associated with higher rates of coerced sex and sexual assault (Krahé et al., 2000; Ossman, 2003). This finding may support the miscommunication theory. If women are miscommunicating their intent concerning sexual encounters intentionally, how are men to be held responsible for accurately interpreting any of the signals women send? To this end, sexual script theory may (or may not) hold the answer. Simon and Gagnon first introduced sexual scripts in 1973. In fact, according to
Beres (2007), sexual script theory was the basis of the miscommunication theory. Simon and Gagnon (1973) utilized a social constructionist framework to generate the first non-biologically based theory of psychosocial sexual development. They explained the idea of sexual scripts, rooted in the ideas of Script Theory, and attempted to explain how sexual behavior is shaped by external, culturally significant sources (Simon & Gagnon, 1973). These implicit, culturally informed scripts inform how individuals approach and participate in sexual activity. In the United States, sexual scripts are typically heavily reliant upon gender roles: men are viewed as initiators, while women are expected to be sexual gatekeepers (O'Sullivan & Byers, 1992).

Of course, sexual scripts are often problematic through the eyes of researchers today. Since they are rooted in gender roles that place a specific initiator-respondent context upon participants in sex, it also places the primary responsibility of consent upon the respondent (Kritzinger & Firth, 1997; Beres, 2010). Indeed, sexual scripts are both laden with and perpetuate the idea that men are always prepared for sex and therefore have no responsibility or need to consent, while women are always responsible for and need to provide consent (O'Sullivan & Byers, 1992; Marcantonio, Jozkowski, & Lo, 2018). However, if women are the only parties responsible for consenting, tend to say no when they mean yes, and are unclear whenever they do mean no, then it appears that women are responsible for their own sexual assaults and men bear no responsibility, according to sexual script theory. Further issues with this theory arise when considering sexual interactions between individuals of the same gender and sexual encounters with more than two partners.

Furthermore, as Firth and Kitzinger (1997) noted, most research on
miscommunication theory stems from participants' recollections. It seems that utilizing this specific data collection methodology could lead to confirmation bias, especially when coupled with the evidence that many women blame acquaintance rape on 'miscommunications' (Koss, 1988). Firth and Kitzinger (1997) brought forth the idea of miscommunication theory to help women maintain a sense of control over non-consensual sexual interactions while avoiding placing blame on men. The culmination of findings from various studies in the 1970s – 1990s builds an empirical narrative that suggests that women are primarily at fault when they are sexually assaulted due to their poor communication.

The first published studies that examined consent in an empirical manner sought to understand more clearly the specific communication methods college students used to express consent (Hall, 1998; Hickman & Meuhlenhard, 1999). Hickman & Meuhlenhard created a questionnaire where respondents were asked to assess two hypothetical scenarios and indicate whether and in what ways consent was expressed. In addition, they were asked to indicate in what ways they would express consent had they been in the scenario. Then, they were also asked to indicate how they would assess how they would communicate consent to their partners in actual situations. Using PCA with varimax rotation, Hickman and Meuhlenhard (1999) identified seven subscales for their collected hypothetical and actual consent scores: direct verbal, direct nonverbal, indirect verbal, indirect nonverbal, intoxication, direct refusal, and no response. Their results found that men and women communicate and recognize signals of consent similarly, emphasizing indirect communications (Hickman & Meuhlenhard, 1999). Hickman and Meuhlenhard (1999) showed the
victim-blaming nature of the miscommunication theory does not have empirical support. Therefore, they showed that the fault of rape lies solely with the rapist, not with the assumed passive communication style of their victims.

Hall (1998) provided participants with a list of verbal and nonverbal behaviors and asked them to identify which they often used to indicate consent to sex. Though there were no gender differences in communication style, findings suggested that both men and women communicated consent primarily through nonverbal behaviors (Hall, 1998). Results also showed that the more intimate the sexual activity, the more critical verbal indications of consent were (Hall, 1998).

Many studies support the idea that men and women communicate and interpret consent using nonverbal or indirect cues (O’Sullivan & Byers, 1992; Hall, 1998; Humphreys, 2000; Beres et al., 2004; Adams-Curtis & Forbes, 2004; Beres, 2010; Jozkowski, 2011; Herold, & Maitland, 2004; Jozkowski et al. 2014; Marcantonio, Jozkowski, & Lo, 2018; Shumich & Fisher, 2018). In a 2004 study examining college-aged women's experiences with sexual coercion, Adams-Curtis and Forbes (2004) note that women reported communicating consent and non-consent, most commonly using nonverbal, nonassertive cues. In addition, there is some evidence that explicit sexual consent is of more importance to women than to men (Humphreys, 2007). However, women seem to have a more difficult time explicitly communicating their consent or non-consent due to feeling a need to caretake men's egos or feelings of fear, confusion, or discomfort (Hickman & Meuhlenhard, 1999; Jozkowski, Marcantonio, & Hunt, 2017). This experience could be because women are more likely to experience unwanted sexual contact than men or because women are often victims of sexual coercion rather than
Sexual Consent in Greece and the United States

perpetrators (Banyard et al., 2007; Katz & Tirone, 2010; VanderLaan & Vaey, 2009).

Beres’s 2010 qualitative work on how heterosexual individuals communicate and interpret consent brings insights into the complex nature of consent communication. Beres (2010) conducted 21 unstructured interviews with participants on their experiences with casual sex, then utilized Braun and Clark's (2006) methods of theoretical thematic analysis to explore the data. She labeled the major themes *tacit knowing, refusing sex*, and *active participation* (Beres, 2010). Despite finding three primary themes, her work highlighted how complex and intertwined the themes were regarding communicating and interpreting consent. Importantly, Beres (2010) also noted stories of women who referred to sex as ‘just happening’: stories where women engaged in sexual activity despite not experiencing sexual desire.

**Sexual What?**

Even prior to sexual consent being empirically examined, there was an influx of terminology and concepts related to consent. In this section, I will delve into these terms, how they relate to sexual consent, their evolution, and why they can add layers of confusion to the conceptualization of consent. For years, the consent/non-consent dichotomy was synonymous with the want/not-want dichotomy (Meuhlenhard & Rodgers, 1998; Meuhlenhard & Peterson, 2005). That is, sexual consent was conceptualized as being congruent with sexual want, and if a person did not want sex, it was indicative of non-consent. Sexual want refers to the level of want individuals have for a sexual act or encounter. Peterson and Meuhlenhard (2007) appear to have been the first to explore the distinction between sexual want and sexual consent. Using a combination of qualitative data gathered from interviews and quantitative data gathered from administering a questionnaire, Peterson and Meuhlenhard (2007) found support for their argument that
sexual want and sexual consent are related, but distinct concepts.

In their pivotal study, Peterson and Meuhlenhard (2007) selected participants who had experienced consensual sex and participants who had experienced rape, including participants they labeled as having experienced ‘unacknowledged rape.’ Participants in this study were asked to complete the Wantedness Questionnaire, which aimed to measure distinctions between sexual want and sexual consent. Results from their EFA bolstered their claims that want and consent are separate. Participants in the rape group showed lower levels of sexual want than participants in the unacknowledged rape group when MANOVAs were conducted; unacknowledged rape victims reported wanting sex more, citing that they were ‘in the mood’ (Peterson & Meuhlenhard, 2007).

Unacknowledged rape may seem like a non-sequitur at first glance. Peterson and Meuhlenhard (2007) utilized this term to account for participants who had experienced non-consensual sex but who had yet to recognize that, regardless of their level of sexual want or the events leading up to the encounter, their lack of consent was enough to constitute rape. Others have defined consenting to unwanted sexual contact as sexual compliance (Impett & Peplau, 2003; Darden et al., 2018; Kehra et al., 2022).

In addition to their intriguing findings, Peterson and Meuhlenhard (2007) also assessed why someone may want sex but decline or not want sex but consent. Some participants indicated that they wanted sex (they were sexually aroused or ‘in the mood’) but were not ready to consent because they felt unprepared for the consequences of sex (which ranged from pregnancy and STDs, emotional unpreparedness, limited experience with the partner, to religious reasons). Participants who indicated they did not want sex
but consented regardless listed a range of reasons, from feelings of guilt and concerns that if they did not consent, they were 'leading their partners on.' Sometimes, participants state the reason that they wanted sex was due to fear of physical harm, fear of hurting their partner’s feelings, or fear of angering their partner (Peterson & Meuhlenhard, 2007). The authors argue that not only is want distinct from consent but that conflating the two concepts can be harmful to rape victims, given that want is often a moniker used in rape myths to dispel blame from perpetrators (Peterson & Meuhlenhard, 2007).

Lending to the idea of sexual want is the notion of sexual ambivalence. Sexual ambivalence refers to uncertainty about the level of sexual want an individual is experiencing (O’Sullivan & Gaines, 1998; Meuhlenhard & Peterson, 2005). Sexual ambivalence is not to be confused with sexual orientation ambivalence, which refers to an individual's uncertainty regarding their sexual orientation (Shellard & Haddock, 2014).

Sexual assertiveness was most profoundly studied and introduced in a 1997 study in which the Sexual Assertiveness Scale (SAS) was developed (Morkoff et al., 1997). In the SAS, sexual assertiveness corresponds to a woman’s ability to initiate sex, refuse sex, and take measures for pregnancy and STD prevention. Results in this study indicated that self-efficacy, anticipated negative response from partner, and sexual experience predicted levels of sexual assertiveness (Morkoff et al., 1997). In a study on barriers to sexual assertiveness, Zerubavel and Messman-Moore (2013) found that a fear of sexual powerlessness negatively impacted women’s sexual assertiveness. Sexual ambivalence may be predictive of unwanted sexual experiences, coercive sexual experiences, or sexual assault (O’Sullivan & Gaines, 1998). Sexual ambivalence may also be linked to lower levels of sexual assertiveness (Darden et al., 2019). Additionally, recent research has
Sexual Consent in Greece and the United States

indicated that sexual compliance is associated with increased risks of mental health harm (Rubinsky, 2020). Sexual agency typically refers to concepts like sexual assertiveness. It is often defined by the ability to select sexual partners with no duress, and exercise one’s will to accept or deny sexual activity with partners (Czechowski et al., 2022). Both sexual agency and sexual assertiveness are related to sexual consent.

In summary, the battery of terms used to describe different types of sexual violence and sexual communication can pose problems for researchers. For example, sexual want refers to a level of ‘want’ a person has for sexual activity and is conceptually distinct from sexual consent (Peterson & Meuhlenhard, 2007), but how does sexual want differ from sexual desire? Are these terms interchangeable? Literature on these concepts does not hold clear answers. Sexual violence, sexual assault, and rape are terms often used as synonyms but occasionally are classified as distinct concepts. For example, Bagwell-Gray, Messing, and Baldwin-White (2015) found that there were 14 different terms with 29 corresponding definitions within the realm of IPSV, some of which directly conflicted with others.

Without a clear understanding of sexual violence, rape, and sexual assault, or what constitutes sexual consent, it is difficult for researchers, legal professionals, clinicians, and therapists to provide adequate support to persons experiencing sexual harm. This muddling of terms also presents grey areas for certain concepts, such as coerced sex and sexual compliance. Sexual compliance, as previously discussed, typically refers to consensual but unwanted sex. When might compliant sex also be coerced sex? Is it possible for coerced sex to be compliant sex if consent is critical to compliant sex? A more systematic and agreed-upon range of terminology should be
utilized when discussing sexual violence and sexual consent in any context to avoid tangling definitions and confusing conceptualizations.

**Recent Research on Consent**

Perhaps understanding sexual consent is nuanced due to the complex nature of communicating and interpreting consent in real-world contexts. Shumich and Fisher (2018) point out that no behaviors are universally used to signify consent to sex. Some scenarios, such as certain acts within the BDSM community, may be consensual even when partners are verbally indicating that they are not, meaning that even a verbal 'yes' or verbal 'no' to sex cannot be considered an inclusive, parsimonious means of describing consent (Shumich & Fisher, 2018).

Muehlenhard, Humphreys, Jozkowski, & Peterson (2016) expounded on differences between sexual consent, sexual want, and sexual ambivalence, and the notion of sexual ambivalence as it relates to a participant's behavior. Sexual want is the potential desire for sex; however, it does not indicate sexual consent. Sexual ambivalence is a feeling of uncertainty about engaging in sexual activity. As Muehlenhard, Hickman, Jozkowski, & Peterson's (2016) work points out, the multiple definitions of consent and how they change over time leave behind distinct discrepancies surrounding sexual consent negotiations.

Humphreys and Herold (2007) created the Sexual Consent Scale to measure sexual consent. The scale consists of two subscales: Sexual Consent Attitudes and Sexual Consent Behaviors. This study aimed to elucidate information about college students' specific mechanisms to communicate consent and determine if a relationship between consent behaviors and attitudes exists (Humphreys & Herold, 2007). While there was a
Sexual Consent in Greece and the United States

reciprocal relationship between the two subscales, this approach did not allow for the same type of discourse on consent negotiation strategies as qualitative work would (Humphreys & Herold, 2007; Beres, 2010).

Despite the items being formulated in part based on focus group discussions, the instrument left open the possibility that individuals were utilizing other consent methods but could not indicate those methods. Humphreys and Brousseau revised the SCS in 2010 with the theoretical framework of the Theory of Planned Behavior. Though construct validity, test-retest reliability, factor loadings, and internal consistency were all confirmed to be statistically acceptable; I have not seen the SCS-R used in any subsequent research.

Although many college students acknowledge that consent should be an explicit, clear agreement between partners, they also tend to communicate consent in their own experiences through more indirect means (Jozkowski et al., 2014). Evidence suggests that both young men and young women endorse and engage in traditional gender roles and sexual scripts (Jozkowski & Peterson, 2013). College students also have gendered expectations of sexual experiences, and experiences of sexual assault on college campuses are clouded by alcohol consumption (Muehlenhard et al., 2016).

Muehlenhard and colleagues (2016) discussed three ways that consent could be described or conceptualized: an internal state of willingness, an act of explicit agreement to something, and behavior that someone else interprets as consent. The purpose of elucidating these three mechanisms of conceptualization is to highlight that a) internal states are unknowable without actionable behavior, and b) behavioral interpretations can sometimes lead to inaccurate inferences. Regarding affirmative consent standards versus
a "No Means No" model of consent, Meuhlenhard and colleagues make some critical observations. "No Means No" was generated in response to the notion that some perpetrators of sexual violence ignore or disregard their victim's refusals, but this model fails to address situations where a victim is incapable of saying no, such as incapacitation (Muehlenhard et al., 2016). The affirmative consent model attends to this issue by ensuring that consent is not clearly provided due to an absence of a refusal; however, it still leaves room for nuanced consent negotiation (Meuhlenhard et al., 2016). For example, Beres (2010) found that one of the primary themes in her interviews on consent communication was tacit consent or a sense of 'just knowing' that a partner was consenting. Furthermore, multiple studies have noted that many partners prefer to communicate consent indirectly or nonverbally. In these types of instances, consent communication is nebulous and unclear, yet somehow also obviously understood by individuals. Which model, then, does this understanding fall into affirmative consent because partners have a mutual understanding and agreement to sexual activity, or "No Means No" because partners have not verbalized an explicit 'yes' to sexual activity?

To conclude that consent can be conceptualized as an internal state of willingness, the authors distinguish between willingness and wantedness, with willingness being synonymous with consent and wantedness being a separate notion (Muehlenhard et al., 2016). Previous research also distinguishes between consent and want (Peterson & Meuhlenhard, 2007).

However, within the discussion of sexual want and sexual consent is the concept of sexual compliance: consenting to sex without the aspect of sexual want (Impett & Peplau, 2003; Darden et al., 2018; Kehra et al., 2022). To what extent, then, are sexual
Sexual Consent in Greece and the United States

compliance and sexual coercion similar? Despite the efforts to clarify consent, this question remains unaddressed.

In 2014 Jozkowski and collaborators generated two scales of measurement for consent. The Internal Consent Scale (ICS) measures a person's internal willingness to consent to sex. The other, referred to as the External Consent Scale (ECS), measures external behavioral factors that indicate consent. Both scales were determined to be valid and reliable, and moderate correlations between the scales indicated that internal and external consent is, in fact, conceptually distinct (Jozkowski et al., 2014). The scales were adapted from Hickman and Muehlenhard's factors (1999), and as such, items were designed to assess internal and external consent to vaginal-penile sex. There was no specific discussion of whether these items were tailored to be more general and applicable to all sexualities, nor was there any indication that the scales were examined concerning sexuality differences.

A replication study reviewing the validity and reliability of the ICS and ECS found that a subscale of the ECS was not valid or reliable (Walsh et al., 2019). In addition, the sample in this study was predominantly women. The authors note that because of their study's sample being mostly women and the construction of the ICS and ECS being built upon vaginal-penile sex, the ICS and ECS need further evaluation to see how applicable it is to people of other genders and non-heterosexual individuals (Walsh et al., 2019).

Consent in Greece

Very few studies that examined sexual consent in Greece. However, one study suggests that young men and women are both perpetrators of sexual aggression and victims of sexual aggression in relationships (Kalaitzaki, Birtchnell, & Kritsotakis, 2010). This study found that
men reported sexual coercion or physical injury as a bidirectional relationship 100% of the time, compared with 71.4% of women who reported being victims of sexual coercion, and only 14.3% of women reporting being both victims and perpetrators of sexual coercion (Kalaitzaki, Birtchnell, & Kritsotakis, 2010). Aside from this study, no studies were found that explored sexual assault, sexual coercion, sexual violence, or sexual consent among college students in Greece. In a 2021 study exploring the prevalence of sexual assault worldwide since 2010, authors openly comment on international research about sexual assault and college students: “To our knowledge, there has been no review of the prevalence of sexual assault among college students outside of the U.S.” (Dworkin, Krahe, & Zinzow). Further, this study included reviews of sexual assault research in Europe, and none of the included studies were specific to Greece (Dworkin, Krahe, & Zinzow, 2021).

To find more information on sexual assault and sexual consent in Greece, the European Union’s Institute for Gender Equality database was utilized. In Greece, the average total number of occurrences of rape between 2011 and 2016 was 221. The proportion of men raped to women raped throughout this same timeframe was approximately 21:203. The average proportion of men who were perpetrators of rape to women who were perpetrators was approximately 214:4 between 2011 and 2016 (European Institute for Gender Equality, 2023).

Though there is limited research and data concerning sexual violence and sexual consent in Greece, there are some studies that broach the topic of sex education. In Greece, sex education is perceived as controversial (Parker, Wellings, & Lazarus, 2009). It can be inferred from commentary in Vassilikou and Ioannidi-Kapolou’s 2014 paper ‘Sex Education and Sex Behavior in Greek Adolescents: A Research Review’ that sex education of any kind was not compulsory in Greece at least through 2014. Kirana and colleagues explored parental attitudes
toward sex education in a 2007 study where they defined sex education as ‘a process that aims to provide individuals with information about human sexuality; to help them explore their attitudes, acquire personal skills, exercise responsibility and build satisfying relationships’ (Kirana, Nakopoulou, Akrita, & Papahantou). Although most parents felt strongly that sex education was useful, results also indicated that most parents felt strongly that schools should not administer sex education. Part of this discrepancy was because most parents also believed that schools did not have adequate resources to conduct sex education, and instead preferred that a specialized organization be responsible for sex education (Kirana, Nakopoulou, Akrita, & Papahantou, 2007).

Teachers in Greece recognize sex education as important, but also find it difficult to discuss with students, classifying it as ‘taboo’ (Gerouki, 2010). In Gerouki’s (2010) study, content from educational textbooks was analyzed for all primary grades. Findings indicated that there were no depictions of nude male or female bodies, no discussion of STIs or STI/HIV/AIDS prevention (Gerouki, 2010). In addition, there was no education that explored romantic or sexual relationships (Gerouki, 2010). In fact, the primary content that discussed anything related to sex only explored reproduction; otherwise, no textbooks provided any additional information about relationships, sexuality, or sex (Gerouki, 2010). There are so few studies that explore sex education in Greece that it appears to highlight the ‘taboo’ nature of the topic expressed by Gerouki (2010). This also highlights the need to explore Greek young adults’ sexual experiences.

**Summary**

To understand a concept as complex, nuanced, and personal as consent it is best to gather a deep qualitative understanding. Qualitative methods are better suited to explore sexual consent, as they provide techniques that value participants' perspectives and seek to acquire knowledge,
rather than generalize or predict behavior (Beres, 2010). Unfortunately, since there is such a paucity of research on sexual consent, it is difficult to conduct meaningful quantitative studies on the topic. Moreover, many existing quantitative studies on consent are quite problematic: studies are either rooted in theories that are inherently sexist and inaccurate, focus primarily on heterosexual white college students, or fail to provide survey instruments that are continuously valid and reliable.

Similarly, many approaches to sexual assault prevention training are also rife with issues. In a recent review of 140 sexual assault prevention strategies, only three were effective (DeGue et al., 2014). These results are partly because most approaches to sexual assault prevention training are not rooted in empirical evidence, tend to be short-term training, and focus more on disseminating information than on a change in attitudes (DeGue et al., 2014). Of the three consent training curricula that were found to be effective, two were focused on middle and high-school-aged children (DeGue et al., 2014). These findings are interesting because many consent training initiatives and sexual assault prevention programs are aimed at college students.

Additionally, many of these training courses try to emphasize an easily digestible slogan, such as “yes means yes,” “no means no,” or “consent is sexy,” though they often also fail to explore elements of sexual consent outside of the yes/no dichotomy. Jeffrey (2022) argues that the emphasis on consent does not necessarily promote ethical sex, suggesting that the emphasis placed on consent in these types of training causes more harm than good. Consent training courses place the responsibility of communicating consent upon women, which further perpetuates the notion of women as sexual gatekeepers and allows men to obtain consent through coercive or violent means without being held
Sexual Consent in Greece and the United States

responsible for their actions (Jeffrey, 2022). Given the lack of research on consent, the incongruent uses of consent in sexual assault prevention training, and the ineffectiveness of such training, more (and better) work needs to be done in this area.

Most research that aims to glean insight into consent communication processes tends to frame consent as a process that exists upon a continuum of communication from direct to indirect and from verbal to non-verbal. However, there is some evidence that direct/indirect and verbal/nonverbal approaches are typically used throughout the processes of consent; approaching research on consent communication with these underpinning ideas could prevent researchers from seeing other nuances in consent communication that are also occurring. Some methods of studying consent involve constructing survey instruments that function essentially as checklists of verbal and non-verbal or direct and indirect behaviors used to initiate or acquire consent. Unfortunately, these same studies leave little to no room for participants to elaborate on their communication methods, describe other elements of their experiences, or indicate whether their communication was free from pressure or coercion.

Though there is a growing body of research on the topic of sexual consent within the United States, there is a distinct lack of studies exploring these concepts within Greek research. Sexual assault and sexual violence are problems for citizens of both countries, yet research on sexual assault and sexual violence prevalence and prevention in Greece is greatly lacking. There is more research in the United States centered on sexual violence prevalence and prevention; however, there are still few studies that examine consent. Greek and American views on sex education are similar in that people from both countries take issue with sex education in schools and do not necessarily feel that school are an
appropriate place to administer sex education. The complexity of the political and cultural climates in both countries offers a unique opportunity to explore sexual experiences and sexual consent among young adults in Greece and the United States.

Therefore, the aims of this study are to ascertain with an attunement to culture, how consent to sex is experienced, negotiated, communicated, interpreted, and understood by young adults in both Greece and the United States, as well as to explore the underlying mechanisms that contribute to consent to sex for young adults in both countries. The research questions explored here are as follows: What elements comprise the complex, dynamic process of communicating consent or nonconsent to sexual activity for young adults? What difficulties exist between young adult partners when interpreting consent or nonconsent to sex? Do differences exist between authentic consent negotiations amongst young adults and those concepts of consent negotiations offered by consent or sexual assault prevention training tools? And finally, what cultural factors, if any, impact how young adults in Greece and the United States navigate consent to sex?
Chapter III: Methodology

We utilized a Constructivist Grounded Theory (CGT) methods approach to understanding consent communication. CGT allows the flexibility to capture unique insights into individual experiences while providing the structure to generate theory. This method functions as an excellent tool for studying concepts that are understudied and have limited existing research or require further study for theory development to occur. For the topic of sexual consent communication, CGT allows the development of a theoretical model that could better explain consent processes than the present literature. We strategically selected CGT over other qualitative methods because our intent is to construct a theory to organize and classify data, other qualitative methods do not fit our intentions. Our aim is to construct a theory of sexual consent communication processes that is inclusive, from a perspective that is not intentionally screened through other theoretical frameworks or motives.

The purpose of this CGT study is 1) to gain a deeper understanding of the complex process of communicating consent/non-consent to sex between sexual partners, 2) to acquire insight into the difficulties that partners face with interpreting consent/non-consent communication, 3) gather data on how authentic consent communication differs from the concepts of consent communication offered in consent/sexual assault prevention training tools, 4) examine the cultural factors that influence perceptions and communication of consent, 5) generate a theory depicting the consent communication process between sexual partners with consideration to cultural influences.

The overall goals of purposes 1, 2, and 5 aim to construct a theory of consent communication that incorporates authentic experiences and conceptualizations into
empirical literature. The overarching goal of purpose 3 is to inform future education, such as consent or sexual assault prevention training, on how these educational materials could be improved to better align with authentic sexual experiences.

Before data collection, we constructed semi-structured interview questions representing the study’s goals. These questions were designed to assess how individuals express consent or non-consent to sexual activities; how individuals interpret their partners’ expressions of consent or non-consent to sexual activities; difficulties that individuals face when interpreting a partner’s expressions of consent; difficulties that individuals face when expressing consent to a partner; ways in which individuals conceptualize consent communication; differences in how consent occurs in the individuals’ lived experiences compared to consent training. Though there are no interview questions specifically geared towards assessing cultural influences on consent negotiation, we anticipate that these cultural influences will be implicitly present within the data. In addition, we collected demographic data during the interviews detailing participant age, gender, race/ethnicity, and sexual orientation.

**Theoretical Framework, Sensitizing Concepts, and Reflexivity**

It is important to note that while I entered this study intending to be open to emerging information and new revelations, it was impossible to enter this research empty-minded with no prior conceptions of consent communication processes. As I have completed two extensive literature reviews concerning research on sexual consent, I began this study with the knowledge, insights, and information I have obtained from the existing literature on the topic. These ideas and insights shape the formation of this study as they are sensitizing concepts (Blumer, 1969; Charmaz, 2005). In short, the sensitizing
concepts I am working with provide me with a unique perspective of what I anticipate seeing within this study and awareness of how important it is not to constrain my data collection processes to fit those concepts. Instead, my aim was to remain open to following the emerging themes, even provided they depart from anything I anticipated finding. Since the theory that evolves from this research is rooted in the data collected, it is also embedded within the cultural milieu of the researchers and the participants. The context of each person's culture, era, education, exposure to consent education, experiences, beliefs, values, and conceptualizations of what it means to be a sexual being are all influential and relevant to this work. As such, this study carries the assumptions, beliefs, values, and contexts of each person with whom it is affiliated.

For this research, I opted not to utilize a theoretical framework but instead not impose a priori themes to allow new concepts to emerge from the data. Given the dearth of research on consent and the lack of exploration of consent with a cross-cultural component, it stands to reason that applying a theoretical framework would likely do more harm to this study than benefit. The distinct lack of research about consent in Greece poses the risk of applying a theoretical framework that is not multicultural. Furthermore, since the most prevalent research on consent communication is embedded within perspectives that are not inclusive, it would be difficult to apply a theoretical framework that is not entrenched in bias. To do so would truncate the potential findings of this study. Thus, I moved forward with this work, acknowledging that my participants, collaborators, nor I am objective within this research but removing the potential for further biased constraints.

**Data Collection**

The participants included in my sample are of various racial and ethnic
backgrounds, but all participants were sampled from either a midwestern land-grand university in the United States, or a community in Greece. This research was approved by the United States university’s institutional review board in accordance with their policies. Prior to data collection, the collaborating researchers met virtually to discuss methodology, interview techniques, rapport building, and strategies for handling difficult conversations with participants. Each collaborator utilized the same set of semi-structured questions.

Our sample consists of young adults aged 19 to 26. This target age group is purposeful; it allows an exploration of potential differences in conceptualizations and communication methods through the lens of age, sexual experience level, and education. Since there are fluctuations regarding the age of consent in the United States and Greece, the age range served an additional purpose in this study. All prospective participants were subject to one exclusion criterion: they could not be younger than age 19. This exclusion criterion was implemented to help certify that all participants were discussing sexual encounters that occurred after they were legal adults in each country. The legal age of adulthood in Greece and in the United States is 18; because participants were asked to describe a sexual encounter that had occurred within the previous year, the exclusion criterion restricted participants from disclosing sexual encounters that occurred prior to the legal age of adulthood.

In the initial phases of this study, American participants were recruited through in-class announcements, emails, and ListServ communications sent to students. Then, snowball sampling was conducted via participants telling friends, acquaintances, and classmates about the study to pique their interest and providing prospective participants with
my university-affiliated contact information. American participants were provided a $25 e-gift card to Amazon as compensation for their time.

Participants in the Greek sample were recruited through in-class announcements and emails provided by a Greek research colleague, who is affiliated with a Greek university. Additionally, snowball sampling was utilized to recruit participants both within and outside of the university community; however, the target age-range for participants was 19-26. Greek participants were not provided an incentive for their participation.

Once participants had contacted the interviewers, interviewers logged their communications in an Excel sheet for the purposes of tracking participant information and progression through the interview process. For example, interviewers logged first correspondence, subsequent correspondence, whether prospective participants requested a preliminary meeting to discuss the consent forms and study format, whether prospective participants had returned a signed consent form, and whether prospective participants had completed the interview. This process helped each interviewer to follow-up with prospective participants if needed.

During the recruitment phases, prospective participants were offered the option of a preliminary meeting, where they could meet with their interviewer to discuss specifics of the study, study format, information included in the consent form, research protocols, and address questions or concerns that they may have. The option of the preliminary meeting was left to the discretion of each individual participant and was not required, it was simply a measure to help ensure that all participants who did follow through with an interview were entirely comfortable and appropriately informed prior to and during their interview.
Interviews

During each interview, interviewers worked to establish a rapport with participants. We began interviews with a brief introduction, introduction to the study, and information that will likely be gathered during the interview. Regardless of whether participants had opted into the preliminary meeting, at the start of the interview each participant was asked if they had any questions about the process prior to starting the interview. We were careful to ask questions about participants' comfort levels before delving into the questions about sexual experiences and consent. Initially, we asked what drew each participant to the study. This helped to identify the participants' specific interest in the study and operate as a bridge toward establishing rapport.

During this introductory phase of the interview, interviewers carefully crafted expectations for participants. No one wants to be blindsided by detailed questions about their sex lives. We explained that the questions were asked specifically to glean insight into consent processes, not to make judgments about participants' sexual proclivities or experiences. Stating openly that the intent is not to place judgment helped create a more welcoming, open environment where participants felt free to share information about their experiences. To that same end, we clarified that participants were free to use any language they were comfortable with – their descriptions of their experiences needed not be clouded with prescriptive or clinical language. Interviewers explained that if we needed clarification about anything said during the interview, we would ask for that clarification directly.

We found it abundantly essential to ensure that participants realize they are free to stop the interview at any time and refuse to answer a specific question. Therefore, we
approached interviews with the idiom ‘the ball is in your court,’ ensuring that participants recognized that they hold the power to share as much or as little information as they wish. This approach goes together with their understanding of confidentiality. As such, interviewers reminded participants that whatever they do share is confidential information that we take great care in protecting. In addition to reviewing their signed consent forms together and ensuring participants understood their rights, responsibilities, and interviewers’ responsibilities to them, we paid great attention to any hesitation or discomfort on behalf of participants. If a participant became distressed during the interview, we paused the recording and discussed their needs. Participants in these situations were invited to take a break, switch topics, stop the interview altogether, or reschedule the interview for a later time. These pauses during distressing moments were crucial not only to acting on behalf of the responsibilities to each participant, but also in ensuring they felt respected and safe.

Other approaches to rapport building occurred during the actual interview. Interviewers maintain a conversational style when interviewing about such personal matters. This approach helps the participant feel more like they are talking to someone and less like they are being interrogated. During the interviews, interviewers took cues from participants’ language and tone; we laughed when they laughed, displayed empathy when they were dismayed, and acknowledged that finding the words to describe nuanced phenomena can be difficult when they indicated that they were uncertain of how to articulate their meanings.

Conducting semi-structured interviews provides the latitude necessary to follow participants' stories in meaningful ways. This technique keeps open the possibilities of
pursuing new leads of interest, allows participants to elucidate their implications, and ensures that all interviews are as elaborate and detailed as possible. The structure maintained certifies that all pre-planned paths are crossed while granting the adaptability to latch on to vital information when necessary. When conducting interviews, interviewers took care to ensure that critical information was not glossed over by following up with ‘why’ and ‘how’ questions when warranted. We remained vulnerable to participants’ words and lead them to expound upon their meanings whenever we felt we were lacking clarity or making assumptions. Interviewers were sensitive to participants’ stories and maintained authentic curiosity about their experiences throughout each interview.

Interview questions began with the introduction shown in Figure 1.

Please describe the events leading up to a sexual encounter you have experienced within the last 12 months. A sexual encounter can be anything from kissing, making out, or groping and beyond. Be as explicit and detailed as you are comfortable. All of the responses and information recorded will be kept completely confidential. You may ask the interviewer to stop at any time.

Figure 1: Introductory Statement for Interviews

Each participant was invited to open the interview with a description of the sexual encounter of their choice. During their description, interviewers were careful not to interrupt while taking notes and memoing. Once they had completed their description, which was usually brief, interviewers would recap what they had said to ensure we had not missed any important information or misinterpreted anything they had disclosed. From there, interviewers tended to ask questions in a chronological order. Beginning at the beginning, we tended to ask questions about how the participant knew the partner(s) mentioned in their story and clarify the type of interaction if necessary (ex. Was this a date?
A hook-up?). Other questions typically asked in each interview involved whether the participant or their partner(s) were under the influence of any drugs or alcohol, and in-depth questions about the nature of their communications during the sexual encounter described.

Interviewers asked probing questions that allowed participants to expand on their statements with more diligence. For example, if a participant described a sexual situation where the participant was interpreting consent, interviewers asked questions that lead the participant to explain how consent was interpreted. What cues did the partner(s) provide that led them to believe consent was given? How were those cues consistent with consensual behavior? Why did they infer consent from those behaviors? What past experiences may have led this participant to those inferences? By probing further, we were able to gather more precise information from participants about their conceptualizations of consent, their interactions, and their experiences. At the close of each interview, participants were debriefed, thanked, and asked to send interviewer contact information to anyone they felt would be interested in participating in the study, in accordance with snowball sampling techniques. Additionally, participants in the United States were provided with information regarding how they would receive their incentives. Within one to two weeks after the interview, each participant was contacted via email by their interviewer. These communications were check-ins, to protect participants from any adverse effects of their participation in the study. Interviewers included information within these correspondences that provided participants with information on participant rights and resources specific to the participants’ region. For example, in the American sample, participants received information about on-campus counseling services, on-campus sexual
assault reporting guidelines, and community-based resources for mental wellbeing and sexual assault or intimate partner violence help. Each interview was transcribed using an AI transcription service. Greek interviews were first translated using the AI service, then transcribed in English, the common language for all interviewers. Greek interviews were reviewed by the Greek researcher and edited for accuracy after translation.

Protecting Data & Confidentiality

All correspondence between interviewers, prospective participants, and participants were conducted via encrypted email, to best protect participant confidentiality and data. Interviews were conducted via a secure Zoom session, where participants entered a waiting room prior to the host (interviewer) admitting them to the meeting. Each participant was encouraged to join the interview from a private, secure space where they had access to a private, rather than public, internet service. Though snowball sampling techniques were utilized, participants were informed that their participation in the interviews was private and confidential. Participants were notified that they were not expected to share that they had participated in the study if they chose to forward information about the study to friends, colleagues, or acquaintances; they could share with the guise of thinking the study topic was of interest to those they reached out to.

All identifying information about participants was removed from the interview prior to transcription. Any names used in the interview were also given pseudonyms to protect the participant, and anyone mentioned during the interview. Prospective participants and active participants were assigned a participant number to protect their identity and confidentiality. These participant numbers were only known to the researchers and were not shared with participants or anyone else. All files and folders
associated with participants were encrypted and could only be identified by the researchers by the participant number.

During the Zoom interviews, participants were informed that they had the option to keep their camera off if that was most comfortable to them; most participants did elect to leave their cameras off. Additionally, participants were offered control over the interviewers’ camera option – they could choose whether the interviewer’s camera was on or off; all interviews began with the interviewer’s camera off by default. This served two purposes – attending to participants’ comfort levels and attending to participants’ accessibility needs. By providing the participants the ability to choose whether they saw their interviewer or not, participants had control over their comfort level and accessibility needs related to audiovisual stimuli. Participants were informed that the interviews would be recorded, and that audio-only versions of their interviews would be saved in encrypted folders on the researchers’ password-protected, private computers.

Data Analysis

Analyzing data within CGT is an inductive, iterative, interpretive process that employs the use of constant comparison to construct themes (Charmaz, 2005). Within CGT, data can be collected and analyzed simultaneously and separately. Interviewers took extensive memos during the interview process. Memos included notes summarizing what the interviewee says, notes concerning academic thoughts each interviewer had about their statements, and questions of interest that may arise during the interview to ask those questions at a later point in the interview. Throughout the interview phases, each interviewer also notated similarities and differences between past participants’ statements and the current interview to maintain those thoughts and use them for comparison during
We found that during our open coding phase, incident-by-incident coding was more beneficial to our study’s goals than traditional line-by-line coding. During this phase, collaborating researchers provided robust interpretations of participants’ meaning, keeping summaries of their statements as close to the actual data as was possible, consistent with CGT methodology (Glaser & Strauss, 1967; Charmaz, 2005). These initial codes aim to reflect the data as much as possible but are also temporary; their role is to help see patterns within the data without restricting the researcher. As recommended by both Charmaz (2005) and Glaser (1978) we paid close attention to gerunds, or verbs that end in ‘-ing’ to gain insight into action and get a sense of progression of events within data.

Once clear patterns began to emerge within the initial codes, we started to construct more focused codes. Focused coding is a sort of distillation process wherein initial codes are collapsed into codes with more overarching themes. It is important to note that focused coding and initial coding do not occur as linearly as it may seem. Though initial codes must precede focused codes, it is not necessarily the case that initial codes for every piece of data must be generated prior to focused coding. It is possible that through the process of developing initial codes, broader, meaningful themes may emerge that can be applicable to data that has not yet been explored. It is also possible that data that appear to already have focused codes applied may have codes change upon re-review. In this way, CGT methods allowed for the flexibility necessary to truly allow themes to emerge in this study.

During all phases of coding, interviewers were careful to take note of any in vivo codes that occurred. In vivo codes are statements or words that are particular to a
participant’s meaning. For example, in this study we identified the in vivo code of ‘vibe’: participants described their ability to recognize when a situation was going to turn sexual by describing a change in atmosphere with their partners that they labeled specifically as a ‘vibe’. This term was specific to certain participants and became an integral part of the codes later. Given that sex is such a personal, intimate activity, it would not be surprising to come across in vivo codes throughout this study.

Data in this study was analyzed by the writers, who collaborated for years on this research study. Collaborating researchers in this study worked independently to generate codes for the data, and then collaborated in Zoom meetings, some in-person meetings, and via email to confer about codes and themes. Our collaborative efforts helped the analysis achieve triangulation, which strengthens the quality and credibility of the study.

Theoretical sampling is a technique unique to grounded theory that allows the researcher to expand and develop the theory by collecting relevant data to their underdeveloped study (Glaser & Strauss, 1967; Patton, 2002; Charmaz, 2005). Since theoretical sampling is specific to the specific needs of each CGT study, each division of this sample utilized theoretical sampling differently, to best meet the needs of the study. As themes emerge within the collected data, anticipated information and unanticipated information begin to converge to form theory. In some instances, theoretical sampling may arise from demographic needs of the study; in others it may occur due to emerging thematic material that could use further analysis.

Theoretical sampling in this study required that I collect more data from male participants in the American sample, and that more data from Q+ individuals was sought after for American and Greek samples. Though I was able to procure one male
participant, the discussion of topics in that interview were not well enough aligned with the overarching purpose of the interview to be included for analysis. Facing time constraints and recruitment difficulties, the research team opted to move forward with data analysis while continuing to recruit more participants. Ultimately, the data in this study contains only a few Q+ participants, and no male American participants.

Throughout early stages of analysis and data collection, it became apparent that participants were describing encounters that they felt were consensual, but interviewers felt the need to dig into what, specifically, led them to believe it was consensual. To this end, it was necessary to include flexible questions that addressed at what points it was evident that an encounter was consensual for all participating in the encounters. After asking questions about whether the encounter was perceived as consensual on behalf of the interview and their perception of their partner’s consent, researchers would ask probing questions to gather data on what specific mechanisms indicated consent between partners. In this way, we utilized theoretical sampling with more in-depth questions to elicit clearer behavioral indicators of consent.

Theoretical sampling was also utilized to examine the concept of reciprocation with more scrutiny. In the early stages of data collection and analysis, participants were using the term ‘reciprocation’ to describe moments when a partner’s actions mirrored or slightly escalated their own actions. As this became an apparent tag throughout early data collection and coding, it also became apparent that flexible probing questions were necessary to glean a full understanding of this concept through the perspectives of participants. Research questions and reminders were added to help facilitate this probing throughout subsequent interviews, which led to the development of richer data pertaining
Sexual Consent in Greece and the United States

to the concept of reciprocation, and eventually to reciprocation emerging as a complex, overarching theme of the Greek and American data.

Greek Sample Demographics

Participants were asked a series of questions concerning demographics at the close of each interview. Participants were asked to identify demographic information about themselves and about the sexual partner described throughout their interview. It should be noted that the information collected about partners may be somewhat less accurate given that the information is second-hand in nature. All questions pertaining to demographics were asked in an open-ended manner, allowing the participants full autonomy to describe their demographic affiliation with as much detail and flexibility as possible.

Our Greek sample consisted of 20 participants, 18 of whom were in their 20s, and two of whom were age 19. All participants, excluding one, identified their partners’ ages as also being in their 20s. The one participant whose partner was not in their 20s, described their partner’s age as 19.

Of the 20 participants in the Greek sample, 40% self-described their gender as male and 60% self-described their gender as female. Participants were also asked to describe the gender of the sexual partner they discussed in their interviews. In the Greek sample, the ratio of participants to partners was 1:1, meaning all participants discussed dyadic sexual interactions in their interviews. Of these 20 partners, participants identified 60% of partners as male and 40% of partners as female.

Demographic information collected from participants also included sexual orientation information for both participants and their partners. Only 5% of participants described their own sexual orientation as bisexual, while the remaining 95% of participants all identified their sexual
orientation as straight. Interestingly, all participants who self-identified as male also self-identified as straight. Furthermore, all participants discussed male-female sexual encounters during their interviews, regardless of self-described sexual orientation.

The final piece of demographic information collected was religious affiliation for both participants and their partners. Participants described their own religious affiliation in one of three ways: ‘Christian Orthodox’, ‘Christian’, and ‘Atheist’. Of the 20 participants, 70% self-described as Christian Orthodox, 20% self-described as Atheist, and 10% self-described as Christian. When describing their sexual partners’ religious affiliations, participants used the same descriptors: 70% of partners were identified as Christian Orthodox, 20% were identified as Atheist, and 10% were identified as Christian. Interestingly, all participants described their religious affiliation as the same as their partners, except for 2. These 2 participant/partner pairs each described their religion as different from their partners’ – one participant was Christian Orthodox with an Atheist partner; the other participant was an Atheist with a Christian Orthodox partner.

**American Sample Demographics**

All participants were asked questions about demographics at the close of the interview, identically to the Greek interview process. Participants were asked about their demographic affiliations in an open-ended manner to provide autonomy and flexibility – participants had the power to describe their own demographic affiliations in their own words. The American sample was comprised of 10 participants, most of whom identified as straight females: however, some participants self-described their sexual orientation as bisexual. Participants ranged in age from 21 to 28 and were all undergraduate or graduate students at the time of their interviews. Participants reported their religious affiliations as either 'Christian,' 'No preference,' or 'Agnostic': no other
Sexual Consent in Greece and the United States

religious affiliations were reported amongst participants. Given the small sample size, specific quantitative data concerning these demographics are not provided to best protect the identities of the participants.

Participants described the partners in terms of relationship status, age, gender, sexual orientation, and religious affiliation in their interviews. Approximately 40% of participants stated that their partners were long-term partners they had previous sexual experiences with, such as a boyfriend, 30% described their relationship to their partners as someone they were casually dating or in a Friends-with-Benefits (FWB) relationship, and 30% described their relationship to their partners as a first-date hookup. In addition, all partners were described as straight males of either Agnostic or Christian religious affiliation in their 20s. Although all participants were undergraduate or graduate students, it is unknown if all partners described were students.

Most interviews lasted 1-2 hours and resulted in transcribed documents between 10 and 25 pages in length. Due to technical difficulties and time constraints, one American participant had to be re-interviewed. Our research team utilized an iterative process for coding data, consistent with Constructivist Grounded Theory methods, (Charmaz, 2006). During interviews, we jotted down memos that helped clarify information and record our own interpretations of what each participant was saying. This process helped the researchers revisit certain topics in future interviews.

Each interview was transcribed using TranscribeMe! AI transcription services. An audio-only MP3 file that was deidentified was provided for transcription, so as to best protect the confidentiality and anonymity of each participant. There were no visual means of connecting the file back to the participants, and files were anonymized to ensure that no identifying information was available in the file name. AI transcription was selected for multiple reasons. One main
reason the research team opted for AI transcription was conservation of time. If researchers could focus on collecting and analyzing data, without the added layer of transcribing the interviews, then they could save some time in the research process. AI transcription seemed to be the most cost-effective and efficient method of transcribing audio.

Most of the interviews were conducted between 2020 and 2021, at the height of the COVID-19 pandemic. During this time, the research team did not have access to Atlas.ti software. Zoom was a novel and ever-evolving technology during this time. Zoom offers transcription services, however, if these were available at the time the interviews were conducted, we were unaware of this. Regardless, Zoom’s transcription services are only available for cloud recordings. In the interest of data and confidentiality protections, all Zoom recordings of interviews were saved locally to researchers’ computers, thus rendering Zoom’s transcription services unavailable as an option.

The use of AI transcription services in qualitative research is quite commonplace, especially in post-COVID research (McMullin, 2023). In fact, AI transcription services have been available for over a decade and are gaining popularity in qualitative research (Point & Baruch, 2023). Procedures for utilizing AI Transcription services are still being considered and developed, thus there is no specific list of approved AI Transcription service companies for researchers to refer to when making decisions about transcription. TranscribeMe! AI transcription services have been used in other qualitative studies. For example, in a 2022 study on ethnic minorities’ perceptions of COVID-19 vaccines, researchers conducted interviews and utilized TranscribeMe! AI services for their transcription needs (Zhou, Villalobos, Munoz, & Bull, 2022).
Once the interviews were transcribed, the research team was diligent about reviewing the transcription documents for accuracy. I reviewed the transcribed American interviews for accuracy, errors, and tone. If there were discrepancies or errors, I had the audio files to compare to for correction. Similarly, my Greek research collaborator was responsible for reviewing the transcribed interviews she conducted for accuracy, errors, and tone. Prior to coding data, we were able to ensure that the written transcriptions of interviews represented the audio data as best as possible. These measures are consistent with guidelines published in a 2021 paper reviewing transcription procedures in qualitative research. According to this paper, who transcribes the interview should be determined by the study’s needs and ethics (MacMillan, 2021). Interviews transcribed by AI transcription services should undergo a quality assurance check of sorts where researchers are responsible for editing, interpreting, and checking the transcription for accuracy prior to data analysis (MacMillan, 2021).

After each interview was transcribed using TranscribeMe! AI transcription services, the American researcher immediately began the initial phases of coding, consistent with recommendations from Glaser & Strauss (1967) and Charmaz (2006). American data was analyzed using Microsoft Excel. I conducted incident-by-incident coding for each interview and copied and pasted lines into a Microsoft Excel spreadsheet with columns for participant number, timestamp from the transcription, the data in the line, a longer summary of the data, and then created a tag that described the information in the specific lines. Tags were generated based upon information in the interviews that was interesting, unique, or that described a phenomenon.

Once this was completed for all interviews, the researcher reviewed each piece of data along with the tags and generated a set of potential labels for each of the tags. After all interviews had tags and were compiled into a single Excel file, the coding continued by
Sexual Consent in Greece and the United States

customarily comparing each data summary, tag, and label with similar data summaries, tags, and labels. The labels were compared to one another throughout the process, and eventually refined and adapted into a series of categories that explained the data. Each label held significance that was specific to the line of data that it was derived from; each category provided a broader understanding of a set of labels.

The categories served as a means of defining and describing the data as accurately as possible, a sort of umbrella term that could be used to interpret the overall meaning of the data. Throughout each phase of coding, researchers compared the initial data claim, the summary, the tag, the label, and the category to one another to ensure that the full meaning of the data claim was robustly demonstrated within the category terminology. Once categories were established, categories were collapsed into broader themes, again using the constant comparative method described in both Charmaz (2006) and Glaser & Strauss (1967).

To analyze the Greek data, the interviews first had to be transcribed into English, the language each member of the research team shared. Each Greek interview was recorded on Zoom, and the MP3 version of the interview uploaded to TranscribeMe!, an AI transcription and translation service. To mitigate any errors in the transcription process, we reviewed each interview file prior to coding to determine if there were any transcription or translation errors. Any translation or transcription errors were resolved as needed by revisiting the recorded interview files and confirming the actual language used and the accurate Greek-to-English translation necessary.

Greek interviews were coded using ATLAS.ti qualitative data analysis software. Translated, transcribed interview files in the form of Microsoft Word documents were imported into the software to be analyzed. The software offers features that allow for notations, codes,
grouping, data visualization and more. Ultimately, researchers used a similar process with the Greek interviews in ATLAS.ti as were used with the American interviews and Microsoft Excel. Each interview was coded incident-by-incident, and each tag was expanded into a label, each label collapsed into a category, and categories were collapsed into overarching themes, all utilizing the iterative constant comparative process that is the essence of CGT.
Chapter IV: Results & Findings

In this study, we attempted to explore the authentic processes that young adults in the United States and Greece use to communicate, conceptualize, and interpret sexual consent using the iterative analytical processes of Constructivist Grounded Theory. This process culminated in the emergence of three models: an American model of consent, a Greek model of consent, and a convergence model that represents the primary themes from the Greek and American models. Each model’s primary themes are comprised of subcategories that were identified as secondary themes that contributed to their primary themes. These secondary themes or subcategories are described and explored in detail throughout this section. Tertiary themes, or the elements that comprised each subcategory, are not discussed in depth, as these elements are best described by the subcategories and primary themes for each model.

American Themes

Throughout the iterative analysis processes of Grounded Theory, five main themes emerged that comprise a proposed model of consent communication: Communicating boundaries, sense of control, creating the context for the sexual encounter, advancing the encounter through reciprocation, and closure of the encounter. Context, control, and reciprocation are the primary themes that emerged concerning consent.

Communicating Boundaries

Authentic sexual consent communication does not always occur with the clarity anticipated by active, ongoing, mutual, affirmative consent models. American participants described communicating boundaries in three main ways: prior discussions of boundaries, testing boundaries, and accepting boundaries. Though all participants described boundary discussions as
a crucial element of that should preclude sexual activity, not all participants described personal experiences where prior discussion of boundaries occurred. For some participants, prior discussions of boundaries were experienced as an ongoing process where partners discussed boundaries throughout their relationship together rather than as a one-time conversation.

Tabitha described how she and her partner had ongoing boundary discussions before trying a new sexual position, "It has definitely been a conversation that has happened multiple times. And eventually we were like, 'hey, let's actually try this since we've talked about it for a little bit.' I would definitely say that we have a gradual progression and conversation about what we're comfortable with, with each other, sexually." For Ashton and her partner, well-established boundaries do not require ongoing discussion. When asked if there was a discussion of birth control or condoms prior to or during the encounter she described, Ashton said, "No. I guess that's another thing that's just like, established between us because of our past history, so it is not something that we express often."

In some cases, prior sexual experiences with partners informed boundaries later. Tabitha describes how there are predictable patterns of communication and progression with her partner that helped establish boundaries, "So like when we cut off this weird small talk that we do beforehand and just kinda start into it, usually we will end up kissing on the couch and stuff, and he'll eventually take off some of my clothes and stuff and eventually ask me if I want to go upstairs or stay on the couch."

Christine talked about how role play with her partner has become an established, predictable pattern of communication that informs boundaries throughout all their sexual encounters together.
"We'll just have a certain dynamic, and he'll like start calling me his little girl. It is almost kind of this power dynamic where, like, he's taking care of me and calling me pretty and stuff like that. It's not like commanding you to do things, but it'll be something like, oh, make sure that you keep still or like make sure you're holding my hand. Or he'll say, like, I don't know, make sure you're looking me in the eyes. And so I'll just have to kind of like do that. So that's the dynamic is sort of it's like so hard to explain, but it's so me listening to him. And so that kind of like establishes this, like, connection of us completely paying attention to one another. So I think that's how we like initially like start to do [sexual] things. It's like we make sure that we're one hundred percent in tune and like I'm listening to him and I respond to him in the way that he wants because, like, that's just kind of like part of the game. So it's would be really clear if I had said something to not go along with it."

Since their experiences with role-playing together have become an established and predictable part of their sexual relationship, Christine describes how deviations in the role-play help partners recognize where boundaries surrounding certain sexual acts lie.

Jennifer discussed a first-time sexual encounter with a partner she matched with on Tinder. In her experience, boundaries were not discussed prior to sex. According to Jennifer, "Yeah, no, I don't think we did. I think, if anything, that maybe there was a few flirty text messages or like a winky face, but never explicitly about sex." Similarly, Kayla discussed three sexual encounters with the same casual partner. They matched on Tinder and began talking on the app before meeting in person. "There was some like, light flirting, but not anything special. Nothing really sexual," Kayla explained. Prior to their first sexual encounter together, Kayla and her partner had not discussed any sexual boundaries.
When talking about another encounter they had together, Kayla discussed how new boundaries were established in-the-moment when her partner wanted to have sex with her while he was intoxicated from alcohol. "And I was like, 'I don't feel like you can consent right now.' He was like, 'No, no, no, it's fine. It's fine. Like I want to.' And I was like, 'okay, but you're falling asleep. Let's go to sleep.' And then we ended up having sex in the morning, I think." In the moment, Kayla expressed to her partner that it would be a violation of her boundaries to have sex with him while he was drunk. Kayla mentioned having a separate conversation about her boundaries about having sex while under the influence the day after this experience. She said, "And in the morning, he was like, 'I hope, you know, like if I said yes like I wanted to' and I was like, 'I don't - like I get that you wanted to, but like, that wasn't really the issue here.' And he was like, 'Okay, but like, I'm giving you permission now if you want to in the future.' And I was like, 'Okay, I'm not going to use that, but thanks.'"

Kayla and her partner had not discussed boundaries prior to sex, but some boundaries were discovered during sex that led to more conversation about this topic. For Kayla, having sex with her partner while he was intoxicated was a firm boundary that she was not comfortable crossing. Despite her partner offering her blanket consent to sex any time he was intoxicated, Kayla explained that doing so violated her own boundaries, and was not something she would do with any partner.

Discovery of new boundaries can sometimes occur through a process of testing and accepting boundaries during sex. For example, Ashton said of boundaries, "It's kind of just something that we figure it out as we've gotten to know each other better." Testing boundaries can occur verbally, as described by Brandy, "I just said, 'tell me what you're thinking right now.' And he was like, 'I don't know.' I was like, 'no, no, no. Tell me what you're thinking.' And he
said, 'I really want to kiss you.' Throughout our interview, Brandy discussed how clear communication about boundaries was an essential value for her in her relationships. In the encounter she described, Brandy had the feeling that her partner wanted to kiss her, and the feeling was mutual. Brandy verbally tested boundaries with her partner by asking him what he was thinking before initiating any physical contact.

Most participants, however, described testing boundaries as being a predominantly non-verbal process. For example, Kayla explained, "It was one of those things where he didn't explicitly ask me if he could, like, touch my boobs, but he kind of like, did the kind of non-verbal thing where he was kind of like going around it." Kayla's partner did not explicitly, verbally ask to touch her breasts; instead, he increasingly got closer to her breasts while touching her body to gauge whether this was a boundary he could cross. In this instance, testing boundaries occurred non-verbally.

Accepting a partner's boundaries was also indicated by participants as a form of communicating about boundaries. This communication generally occurs when a participant in a sexual situation expresses their boundaries, and their partner responds appropriately. For example, if a partner communicates that a boundary is being crossed, the appropriate response is to stop the activity. Ashton described a sexual encounter with her long-term partner where she became uncomfortable during sex and verbally expressed that she did not want to proceed; her partner responded by stopping the sexual activity and talking with her. Ashton explained, "I just said like, 'hey, I don't really want to do this anymore.' And they were like, 'Okay, that's fine. Look, I'm not going to make you feel bad for that. Like, I'll see you again.'"
Ashton verbally established a boundary during sex, and her partner’s response was to stop the activity and talk with her in a comforting way. Her partner accepted her boundaries in the moment and took steps to make her feel comfortable.

Accepting boundaries can also include a partner consenting to a new boundary being crossed. For example, Jennifer discussed a first-time sexual encounter with a new partner where the boundary of oral sex was explored. Her partner paused and looked at her before performing oral sex in her encounter, and she responded by nodding to indicate her consent. Later, Jennifer described the communication process that occurred when she offered her partner oral sex:

"I asked him a similar question and I get the vibe that he's very conscious of his partner and like those sexual situations. He even said like, 'oh, like that's not a big deal. Like, that's not what this is about.' And so to me, that felt like him basically saying, like, 'I'm prioritizing you right now, so you don't need to do that.'"

For Jennifer, boundaries surrounding oral sex were explored and discussed in-the-moment. Her partner paused prior to performing oral sex to gauge whether she was okay with this activity, and only proceeded when she non-verbally indicated with a nod that she was consenting. Later, when Jennifer verbally offered to perform the same activity for her partner, his response to her was verbal. Their process of testing new boundaries together consisted of verbal and non-verbal forms of communication during a sexual encounter, where boundaries were negotiated and accepted in kind.

Participants indicated that a partner accepting boundaries contributes to a sense of comfort and control within their sexual encounters, and that this sense of comfort and control helps reinforce future sexual communications. When participants described feeling comfortable communicating about their boundaries, that comfort extended into future encounters with their
partners. Communicating boundaries and feeling in control are connected; having the comfort to make their own sexual choices and communicating about those choices with their partners was described by participants as an interplay between emotions and communication.

**Sense of Control**

Participants described feeling a sense of control as being an essential facet of their perceived ability to communicate about their level of consent to an activity. Similarly, when participants described experiencing a sense of comfort with their partners, they also tended to describe feeling more in control of their sexual decisions. Participants described comfort in many ways: a general sense of comfort, comfort stemming from a long-standing bond, and comfort resulting from positive past experiences with their partner.

Jennifer described a general feeling of comfort during the first date with her partner that led her to feel comfortable communicating about consent and engaging in sex later, "But like, I went out on a date with this guy. And as the night went on, just I felt really comfortable talking to him like I was just having fun. He was funny and just really sweet in different ways."

Kayla’s depiction of her experience with a sense of comfort clearly indicates that not feeling pressured into activity greatly lends to her sense of comfort and control, "Then we left and went to my house and then some of those things where it was kind of like physically building up, but there was no pressure around it." She later explained, "They didn't feel like I was being pushed to do something, I felt very much like very in control of like consenting to it and being not like in charge, but very much feeling autonomous in my decision, which I appreciated." Whereas Nicole elaborated on how she developed a sense of control with her partner through multiple positive experiences over time, "I'm just not in the mood today" or, "Hey, I feel really sick, like it's just not going to be good for me." That communication has gone
both ways before. So knowing that it's there is something that allows, I guess, me to know, too, that he'll tell me if he's not consenting to that or something."

For Jennifer, a general sense of comfort with her partner on their first date allowed her to feel comfortable enough to engage in sex with him later in the evening. Kayla’s feeling of autonomy and sense that she was not under any pressure with her partner helped her feel comfortable and more in control of her ability to make sexual decisions with her partner. Nicole’s multiple experiences with the same partner inform her sense of comfort with him: since there have been times when each of them has declined sex in the past, she feels comfortable that her partner will communicate his needs to her, and a sense of comfort communicating her needs with him.

Christine talked about how her long-term relationship with her partner, their communication styles outside of sex, and their BDSM role-play all contribute to a sense of comfort and an overall sense of control over her sexual decisions: "People in our communication styles are very, very similar just across the board. So I think that's another just important context for our relationship is that that we're, I would say, one hundred percent comfortable with each other when it comes to...I guess just like talking and bonding, like I feel like I 100 percent know who he is and he does me and we talk about absolutely anything, if it's like good or bad or it doesn't really matter."

Christine and her partner have strong communication with one another in all domains, which lends to a strong sense of comfort about any topics they may encounter, including sex. This, combined with the values of consent and communication laden in the BDSM community she and her partner belong to, converges into a distinct sense of comfort and control with her partner.
Ashton discussed an encounter that involved a high level of discomfort, though, throughout the encounter, she still felt a sense of control. She and her partner had verbally agreed to have sex during a specific timeframe of availability when several contextual factors created a general sense of discomfort and disengagement for her. During their encounter, an external time constraint added stress, she felt an internal pressure to fulfill her agreement to have sex with her partner, and the malaise from a long day created a sense of "blah-ness," she described. As their sexual encounter began, Ashton recognized that she was uncomfortable and finding the experience unenjoyable.

Ashton communicated her discomfort to her partner verbally, "And I said, like, I thought that I would be into it, like, you know, obviously earlier in the day I wanted to... but I just said, like, oh, I thought I was going to want this, you know, like I did earlier, but I'm really just not feeling it anymore." Ashton further explained that she felt comfortable ending the sexual encounter with her partner because of past experiences with him: "I just know from other experiences, like any time I'm not into something and he doesn't know it, and then I express that later, he is very like, apologetic about it."

Ashton knew from previous experiences that her partner would be accepting of her boundaries and be a comforting presence if she ended the encounter. This sense of comfort from prior experiences led to Ashton feeling in control of her sexual decisions with her partner.

Creating the Context for the Encounter

What sets in motion a sexual encounter? Not all consensual sexual encounters begin as quintessentially "hot and heavy" as may be thought; as Ashton put it, "I think that we're portrayed in college as being like little hormone monsters and just like busting in the door and getting right to it right there in the stairwell. But I don't think that's realistic." Creating the
context for a sexual encounter is just as crucial to understanding the consent process as any other factor. Participants described the process of creating context as occurring in a few different ways, some of which occur in a combination prior to and during the start of the encounter: mutual agreements to engage in sex, spending time together, and sexting as an indicator of future interest in sex are primary ways in which contexts for sexual encounters can be created. Anticipatory cues can also set the tone for a sexual encounter to happen. For some partners, sexual encounters are initiated via text. Sexting is described as a mechanism for communicating sexual desire and sexual interest.

As participants explained how their sexual encounters began, some delved into how sexting set the tone for their upcoming in-person meetings. Nicole described how starting a sexual conversation via text helped her and her partner to communicate their sexual desire for one another, "I think at least at first, I was the one that reached out to start the conversation via text. And then once he realized I was on the same page and then once we were here physically together, it was definitely a mutual thing." Sexting was a form of communicating interest, boundaries, and eliciting excitement for upcoming sexual experiences for Nicole and her partner.

Tabitha described that sexting between her and her partner is more nuanced than explicit, but still helps her initiate sex with her partner, "Like, I'm never like, I want to have sex. Like, I'm never straightforward in a text like that. I'm always like, Are you free tonight? Do you have to work tomorrow? Like, I'm always like very much like what's on your schedule. Like, how's your day going? Like I just very much tiptoe around it. And then he's like, You want to come over, don't you?" She further explained how sexting about future events helps her and her partner establish boundaries prior to their encounters, “The hours leading up to us seeing each other or we have well, I would say that's what mostly happens. It's a text conversation a couple of hours
before we actually see each other. And then when we see each other, we say, like, okay, this is what you want to do. Yes, this is what I want to do. This is how I want to do it.”

Tabitha and her partner initially establish that they are going to have sex in a coy way; Tabitha typically initiates by posing seemingly innocuous questions as cues to establish the context of sex between her and her partner. During the interim between initiating communication about an upcoming sexual encounter and the actual sexual activity, Tabitha and her partner sext one another with ideas when they are physically together. This communication technique allows Tabitha and her partner to establish a sort of script, including preliminary boundaries and expectations that is specific to their upcoming sexual experience.

Participants also discussed how mutual agreements and anticipatory cues helped create the context for their sexual encounter. Sometimes anticipatory cues establish mutual agreements to sex between partners; sometimes, mutual agreements are communicated more clearly when done verbally. Some participants explained how mutual agreements occur primarily verbally; others discussed how location or activity (such as watching a movie or smoking marijuana together) have developed into anticipatory cues for sex.

For Christine, mutual agreements are typically communicated explicitly and verbally, "Well, basically, because we do like those like the same types of things, if we were to like want - if we wanted to have sex or either one of us indicated that, he would probably ask, or I would ask. We're just verbally saying that. So, it didn't really end up there at all. It was kind of like mutually assumed that we weren't going to have intercourse because neither one of us asked." Christine explained how she and her partner advanced from making out to foreplay but did not progress into other sexual activity as there was no communication that either party wanted to
move into further activity. In her experience, Christine and her partner did not move into other sexual activity unless a mutual, verbally expressed agreement to do so occurred.

Tabitha discussed a sexual encounter with a friends-with-benefits partner. She explained throughout the interview that the anticipatory cue for sexual activity for her and her partner is meeting at a specific location, his place, "Ever since we have decided to have a friends-with-benefits relationship, every time I go over there, it is about sex."

All participants described physical, sexual encounters (rather than virtual) preceded by time spent together in the same physical space. Time spent together appeared to contribute to setting the context for a sexual encounter and contributed to the overall sense of comfort participants described feeling with their partners.

Regardless of the activity participants engaged in during time spent together, physical proximity was an essential facet of creating the context for a sexual encounter. When partners described the moments that escalated to a sexual encounter, they talked about topics such as a closer physical proximity to their partner, engaging in or receiving non-sexual physical touch, or an experience of sexual/physical tension.

Brandy's experience reflects time spent together and physical proximity as factors that created the context for her encounter. "I was out at a park on a date with my then not quite my boyfriend, this guy I had started dating, and it was like it was late at night and up on the bluffs, so it was like no one else there. The arm was around me and like we were standing very close. We were talking and then we were just standing there facing each other." This situation created the context for Brandy and her partner to experience their first kiss. Being physically close to one another and oriented toward one another at the close of their date ushered in the moment that led to their first kiss.
Here, Kayla described the time spent together with her partner prior to their sexual encounter, "And we met up eventually after kind of like talking for quite some time and went on a walk, did the like covid date thing came back to my house. We hung out for a while and he kissed me." Later, she explained further, "There was physical tension in the sense of like we were like sitting really close to each other or like my like, legs were in his lap or like there was more of the, like, little physical kind of things."

Jennifer also described the non-sexual physical touches, physical proximity, and sexual tension that developed on her first date: "And I think, like at the bar at one point, you know, things started progressing there. Like he would put his hand on my lap, like a couple of times throughout the night. And it felt more like just like one of these like - I had my legs crossed and his hand was kind of like on my leg, but like under my other leg, you know. So like even that way of like putting your hand on someone's lap feels different."

For both Kayla and Jennifer time spent together, physical proximity, and non-sexual touching set the tone for the sexual encounter that followed. In both of their situations, non-sexual touching was more intimate in nature; sitting close to their partner, and their partner having their hands on their laps was indicated as being an intimate way to touch someone, despite being non-sexual.

In consensual encounters, creating the context is typically followed advancing the sexual situation through reciprocation. Participants described how their sexual encounters progressed once the context for their encounters was set in motion in various ways, though the defining aspect within these was reciprocation.

**Advancing Sexual Encounters Through Reciprocation**
Participants described reciprocation as the critical component for consensual sex. Reciprocation serves as a primarily non-verbal means of communicating interest in the current sexual activity. Reciprocation is best described as one partner mirroring the actions of another partner. For this model, reciprocation is also considered a means of advancing the encounter when partners intensified the current activity or began a similar activity that was considered more intimate. For example, reciprocation as a means of advancing the encounter may occur when partners are making out, and one partner begins removing another's clothing. This move from making out to the more intimate, but similar, activity of making out while removing clothing is only viewed as reciprocation when the other partner responds in kind, mirroring the action of removing clothing - or when the other partner indicates it is consensual by allowing the partner to remove their clothing and continuing to engage in making out. Further, reciprocation is interpreted by partners similarly: when participants described how they knew their partners were consenting to new activities, they often described interpreting their partner's consent via reciprocation of similar sexual activity.

Proximity is critical to understanding occurrences of reciprocation. Participants frequently discussed physical proximity to their partners as an indicator of sexual interest, reciprocation, and overall consent to the activity occurring. For example, if a partner’s body is oriented towards another partner, with minimal distance between them, and they are mirroring actions, this was typically read as indications of consent.

Brandy explains how she interpreted her partner's consent to kiss, "And then kissed again. Once again, it was slow, there was a lot of eye contact before, a lot of waiting before - it felt very long. It was probably like three seconds, but it felt much longer. It's like waiting to be sure. But at that point, I felt pretty confident that if he wasn't pulling away, he was participating." She
Sexual Consent in Greece and the United States

further describes the role that proximity and reciprocation play in her communication and interpretation of consent, stating, "If another person is not doing what you're doing or is avoiding what you're trying to do, or like the way you are moving or being close them or whatever. I think that's where you have to either you have to either verbally say, like, "Is this okay?" or "are you okay?" or change it. I don't think you can think if a person isn't participating, you can't really guess if that's consent."

Nicole does not find mirroring actions as sufficient evidence of consent, instead describing the importance of small escalations in activity when engaging in sex with her partner. She described how she interprets her partner's consent, "I definitely am trying to gauge. What's being reciprocated or what's just like kind of doing the bare minimum if we're both taking steps to progress the situation or if it's just me or if it's just him. And in this instance, it was definitely - we were both doing things to progress the situation, not just reciprocating. Like I take his clothes off and he touches me somewhere." When I asked Nicole to elaborate on her thoughts about reciprocation, she explained that merely mirroring actions without escalation could be a cue to check in on her partner. To feel that she is genuinely in a consensual encounter, both partners must be reciprocating and increasing the intensity of the encounter. In her elaboration, she said, "If I think my partner was just reciprocating and not doing anything else, I would definitely stop and ask like, 'hey, do you want to do this' or something like it would just kind of be a slight red flag to me. And so I, I think it at least puts in my mind its just is something that is questionable at the moment."

Participants described the moments after a sexual encounter ends in two ways: going to bed, or one partner leaving. When sexual encounters come to a natural close, partners who planned to spend the night together or who lived together reported some talking and cuddling
followed by falling asleep. Partners who had not planned to spend the night together, did not live together, or had another reason to leave after the closure of the encounter, reported some talking afterwards, followed by one partner leaving.

The American model of consent is depicted in Figure 2. Participants in the American sample described their sexual encounters in a sort of two-step model where multiple themes are interdependent. There is a reciprocal relationship between the themes Communicating Boundaries Informs Consent and Feeling in Control Allows for Communication. As participants described feeling in control, they also described an increase in their confidence level in communicating boundaries with their partners. As participants described high levels of confidence communicating about boundaries, they also described a strong sense of control over their sexual activity. When participants felt in control and capable of communicating boundaries, they could Create the Context for a Sexual Encounter, or engage in Advancing the Encounter through Reciprocating Actions. By creating the context for a sexual encounter, participants were also communicating, either directly or indirectly, boundaries that informed their partners’ interpretations of consent. This is also true for advancing the encounter through reciprocation. Describing the act of reciprocation was often connected to a sense of control over sexual activity, and described as a perceived communication of boundaries. Participants in the American sample described situations where some form of communication around boundaries, or some sense of control over the direction and intensity of a sexual situation, or both, occurred prior to the onset of sexual encounters. Afterwards, participants described creating the context for a sexual encounter to occur, which led to advancing the encounter through reciprocating actions. These two themes were constantly described as complex, interdependent activities that held reciprocal
relationship with the themes communication of boundaries informs consent and feeling in control allows for communication.

![Diagram](image)

**Figure 2: American model of consent**

**Greek Themes**

Our constant comparative process found four main themes for the Greek interviews: Vibe, the perceived sexual tension in the atmosphere prior to a sexual encounter; Apprehension, the internal feeling of concern for their partner’s enjoyment; Socially Constructed Boundaries, the anticipated boundaries that partners bring into a sexual situation that are shaped by culture and society; Communication, how partners express consent or non-consent; and Reciprocation, the practice of actively matching a partner’s level of participation in a sexual encounter.

**Vibe**

The sexual encounters described in these interviews highly emphasized the concept often
referred to within the interviews as ‘vibe’ or ‘ambiance’. While there was some variation on
whether the sexual encounters described were expected or not, in all but one circumstance, the beginning of each encounter occurred through non-verbal communications that were the direct result of a perceived vibe, or sexual tension, experienced by the participants. Regardless of self-identified gender, participants repeatedly described this sense of sexual want within the atmosphere immediately prior to the start of sexual situations.

Many made statements about how they could ‘sense’ that their partners were also interested in moving toward sexual activity; or statements about how the sexually tense atmosphere triggered the start of sexual activity. Even in situations where sex was an anticipated outcome, the progression of sexual activity did not occur until the ‘vibe’ was present.

Penelope described her experiences with vibe as an intense, erotic feeling shared between her and her partner. “Yes, from the moment we met there was eroticism in both of us, from the moment we looked at each other, it was something very intense.” Penelope continued describing the ambiance surrounding her date as flirtatious. “Well, we went for a walk on a mountain, and we were talking about general stuff, there was flirting, from the beginning we knew there was flirting and then we got in the car and there were some touching from both sides. So, it seemed like [what] we both wanted.”

Similarly, Layla discussed a ‘strange atmosphere’ laden with eroticism:

“I just said that I don't know if you realize it, but there's a very strange atmosphere between us, not strange, very intense because I had a very rapid heartbeat. He was looking right and left and he was trying to distract his attention, my attention, in general there was a lot of awkwardness, but it was because of the eroticism. I mean, it was this fast heartbeat that means that we both want something to happen and no one's talking.”
Layla continued, mentioning that during a discussion with her partner, he identified that he also noticed the sexually tense atmosphere between them. “So, I told him, I guess you feel what I feel right now and that there is something strange and nice in the atmosphere and he said that he also feels that way and he was relieved that I told him and then he made like the first move, he caressed me on the hand and so on and so on.”

Des was on a date with a man she had been in a long-distance flirtatious relationship with when she described experiencing the vibe. “We went back home, in general there was a very nice atmosphere between us, maybe because we had the distance and we wanted more to see each other, and nothing more sexual had happened before.” Despite having no experience with one another sexually, Des’s account of her date shows how she and her partner were experiencing a sexually tense atmosphere.

Daphne’s account of her date was similar, “Because there was no sign of resistance or at least to feel some hesitation. And there was chemistry, let’s say.” She indicates throughout her interview that there was a mutual sense that her and her partner wanted to have sex, even before any specific activity or discussion occurred. In this portion of the interview, Daphne refers to this as ‘chemistry’.

Althea’s use of the term ‘vibes’ led to the direct use of the term Vibe for this theme. When discussing how she determined whether her situation would turn sexual, she said, “Yes, in general there was such a vibe, I mean it was not so much that we want to know each other, it was more sexual.” Her description of the ‘vibe’ as a purely sexual feeling, rather than a desire to form a romantic relationship, refines what Vibe as a construct means. Although Althea was not the only participant to use this terminology to describe the sexually tense atmosphere leading up to sexual encounters, her descriptions of ‘vibe’ were consistent throughout her interview.
This theme is very similar to the theme in the American interviews of ‘Creating the Context for the Encounter’. Creating the Context for the Encounter was described in two ways in the American cohort: mutually agreed upon meetups and predictable patterns of behavior. In this theme, mutually agreed upon meetups were typically indicative of explicit, direct communication, either verbally or through text messages, where partners agreed on a location to meet to start their sexual encounter. This means of creating the context for the encounter was not exclusive to couples in longer-term relationships; this also occurred in some situations with new partners, hook-ups, and one-night stands.

Predictable patterns of behavior were described most often by partners in longer-term relationships, or partners who had been sexually active with one another for quite some time. This could look something like two partners in a relationship going to bed, cuddling, one partner beginning to fondle the other, and the understanding that this pattern of behavior typically led to consensual sex. It could also look something like two partners who are not in a relationship, but who are familiar with one another, getting together at one partner’s home to watch a movie with the understanding that when they do this, they are typically going to engage in consensual sex.

While Creating the Context for the Encounter and Vibe are similar themes, they were described differently enough to be distinguished from one another as distinct concepts. Participants in the Greek interview cohort did not clearly establish that the experiences described were commonplace for their relationships, or that these were culturally accepted practices that always predicate sexual activity between partners. However, the Greek cohort did clearly establish that there is a specific feeling occurring during these moments that is unique to sexual encounters.

Apprehension
Several participants in the Greek sample described some level of anxiety or discomfort during their sexual encounters. All but one participant, whose described encounter was not consensual, discussed how the anxiety and discomfort felt during their encounters was not because of their partner. In some cases, this sense of discomfort stemmed from being sexually inexperienced. In other cases, this sense of apprehension and discomfort stemmed from first-time interactions with new partners, and the concern for their comfort. Some participants also described a sense of anxiety or pressure that was not directly brought on by their partner, but by their own desire to provide their partner a pleasurable time. That is, apprehension is described in three primary ways: apprehension stemming from sexual inexperience, apprehension stemming from inexperience with a newer partner, and apprehension brought on by a concern for their partners’ comfort and pleasure.

For Penelope, the theme of Apprehension was discussed in response to an interview question asking if she had felt pressured to have sex with her partner. She detailed how there was a distinct sense of sexual energy in the atmosphere immediately prior to her sexual encounter, but how there was also a sense of embarrassment and nervousness, as well. “No, no, it was just an embarrassment because I wanted it very much and was looking forward to it. I wanted to see his reaction, of course, and because we talked about it later, he told me that he was feeling what I was feeling, that he wanted very much but he just didn't know how I was going to feel. We were both thinking how the other one was going to see it, that anxiety I mean, but not pressure. So, we wanted to have sex.” Penelope’s description of her anxious feelings seems to be in line with the colloquial notion of ‘butterflies in your stomach’, a sort of nervous excitement, rather than a clinical level of fear or nervousness. Penelope was excited for her sexual experience with her partner but was also feeling a twinge of apprehension due to their lack of experience with one
Sexual Consent in Greece and the United States

Liam also discussed a sense of awkwardness and apprehension during his sexual encounter with a partner. Liam has been dating a woman he met through Instagram for about one month when their sexual encounter occurred. Prior to this encounter, Liam had established the boundary that he wanted to get to know his partner better before moving into a sexual experience together. According to Liam, he did not anticipate the encounter to turn sexual at the time, and once it did his primary sense of anxiety was concern for his partner’s comfort.

“I wasn’t sure if I wanted that moment to do it, not in general, in general I wanted to, just that moment I wasn’t so sure. I didn’t feel so comfortable because it was the first night that I was sleeping with her, although we went out for about one month, and I didn’t want her to think that I am pushy or aggressive, or anything, so I didn’t want to make the first move, but because it happened this way and she started the kissing and then she kept fondling, I think that it was mutual and consent.”

According to Liam’s account here, he experienced both sexual want and discomfort, because he was surprised the activity was turning sexual and did not want his partner to feel that he was aggressive or pushy. In this way, Liam’s account describes a situation where he wanted to engage in sexual activity but felt anxious about whether his partner was comfortable. Here we also see reciprocation factoring into the conceptualization of consent: though he was concerned about his partner perceiving him as sexually pushy, her reciprocating actions helped inform him that the activity was wanted and consensual from his partner’s perspective too.

Layla discussed anxiety and awkwardness stemming from her encounter with a newer partner that was a family friend. Layla and her new partner set up a plan for a date that ended up needing to be reformulated because of weather. Instead of adhering to their original plan, Layla
Layla’s discussion of feeling anxious and awkward, while also feeling comfortable and safe, depicts a distinct picture of how a person can experience a myriad of different emotional states at once, and attribute these emotions to distinctly different causes. Also recognizable within this quote from Layla is the theme of apprehension appearing in conjunction with vibe – there was a distinct energy felt between Layla and her partner, a tension she describes as an awkward pause where she got the sense that they were both wonder what would happen next. This tension broke whenever they kissed one another and moved further on into their sexual experience.

**Socially Constructed Boundaries**

Many participants had the sense that boundaries for what were described as ‘normal’ sexual encounters did not need to be discussed as they were inherently, culturally understood. During the early stages of a new sexual relationship, or on a first-time sexual encounter, many believed it would be uncommon for a partner to bring in something deemed as ‘extreme’,
‘intense’, or ‘abnormal’, such as a specific fetish. As such, it was not seen as important or necessary to discuss sexual boundaries prior to or during a sexual encounter. Additionally, discussions of STI and pregnancy prevention methods were considered uncommon and unnecessary because it was culturally implicated and understood that these prevention efforts were necessary in all sexual situations. Many participants described this type of boundary as being ‘taken for granted’ or being a ‘given’ – you don’t have to ask about condoms and birth control, because it is uncommon to engage with a partner whose preference is to not use these prevention methods. Subthemes within the category of Socially Constructed Boundaries, thus, were labeled ‘Normal’ Activity and Protection Assumed.

Althea’s account of her encounter with her partner demonstrates how boundary discussions are not seen as necessary. “No, no, there wasn’t, it was just the vibes, and, we met at a party, so it was where we would end up. So, no discussion.” When probed further about whether boundary discussions were necessary, Althea responded, “No, and it didn’t need, I mean because it was the first time, you don’t go usually to something more intense, or to propose fetish or something. So, it didn’t need and prior to the date we had no discussion.” For Althea, the overall vibe she felt between her and her partner, in conjunction with the social norm that initial sexual encounters should be for ‘normal’ types of sexual activity led her to feel that boundary discussions beforehand were unnecessary because of a socially understood expectation of where boundaries lie in these types of situations. In Layla’s description of a first-time experience with her partner, she expresses similar sentiment, pointing out that there is a social expectation for how first-time experiences go, because they are typically mellow and predictable. “No, but you know, because it was the first time, usually on the first time nothing too extreme happens, or maybe if something happens, I don’t consider it as very normal.”
Penelope’s discussion of her experience echoes that of Layla and Althea. When asked whether she and her partner had discussed boundaries before or during their first encounter, she responded, “The truth is that at that stage there wasn’t,” expanding on her statements she said, “So, in the first encounter you usually do a little bit more "safe" things, to not pressure for something or not to intimidate the other person, to not scare him with something that you might want or maybe he wants something and he does not know how you will react.” In Penelope’s experience, first-time sexual experiences with new partners are not the place for specific fetishes or more intense sexual activity. It is uncommon for a partner to try to initiate any sex acts that are not considered ‘normal’.

Couched within the theme of socially constructed boundaries is discussions of protection. Although no participants indicated having specific discussions prior to their described sexual encounter concerning protection, two key distinct means of addressing protection emerged: the assumed importance of protection and discussions of protection during the encounter. Many participants indicated that they did not have discussions about protection prior to their encounters, but that the importance of using protection during penetrative sex was assumed by both parties anyway. These were typically described in instances of the male partner putting on a condom prior to the onset of penetrative sex, despite no direct or indirect communication from his partner to do so.

Theo, for example, described the importance of protection in terms of potential sexual situations. “No, I took my protection anyway. Maybe if I hadn’t taken protection then such a conversation may have happened.” Theo clearly indicates that protection is an important aspect of sex for him, so he prioritizes bringing condoms whenever he believes that a sexual occasion may occur. Similarly, Callie describes the importance of protection to her and her partner.
Although Callie did not have specific boundary discussions prior to her encounter with her boyfriend, she and her partner did discuss the possibility of having sex beforehand. “It has been some discussion. That we're alone in the house and that we're going to put on a movie to watch. but I think we both knew we were going to end up there because we had taken the condoms near to us, so we expected it.” For Callie and her partner, condom use is not only important, but implies that sexual activity is up for negotiation. Sophie and her partner never discuss protection prior to sex because it is an established boundary. “No, because we always use, so there is no question.” Sophie and her partner prioritize protection to such an extent that it is an anticipated boundary for her and her partner. In all of these instances, participants describe how condom use is not a shocking revelation or difficult conversation, because it is socially and culturally important to do so, eliminating the need to reiterate this boundary each time you engage in sexual activity.

**Reciprocation**

Exploring the theme of Reciprocation within the Greek sample elucidated many interesting insights that built upon the theme of Reciprocation in the American sample. In the American interviews, Reciprocation was also a critical, major theme. Within Reciprocation for the American cohort, a subtheme of importance was proximity. Interviewees described reciprocating actions in terms of how close partners were to one another, and how close they each continued to get to one another throughout the encounter. When a partner takes steps to provide distance between themselves and the other participant, it is seen as an indicator that perhaps, the partner wants to slow down, or that a check-in is necessary. In the Greek interviews, proximity was also discussed in relation to Reciprocation. However, the Greek interviews built upon this subtheme through discussions of proximity and reciprocation being considered ‘active’
participation in the activity. Additionally, the Greek interviews provide glimpses into what constitutes ‘passive’ actions. Many participants mentioned being able to interpret a partner’s actions as consensual because there was a lack of resistance. Their partners were actively engaged in the activity, reciprocating actions without interruptions.

In the interest of transparency, I want to recognize that reading these perspectives about reciprocation and lack of resistance were, at first, alarming. When interviews described being able to tell that an activity was consensual because their partner failed to stop the activity and continued reciprocating did initially raise concern to me. This is a clear example of moments where it became necessary for me to pause, check my filter, and regroup. During coding of these interviews, I recognized that I was approaching the data with a judgmental filter. When this occurred, I stopped my coding processes, took time to process my thoughts and feelings, and took care not to address the data again until I was fully capable of setting my internal conflict aside. Once I could approach the data again with a fresh perspective, I could address the task from a curious, academic stance that allowed me to generate codes that better represent the data with less bias embedded within them.

While participants often pointed to reciprocation as a sign of indirect, but enthusiastic communications establishing consent, many also simultaneously acknowledged that reciprocation alone did not constitute consent. That is, participants indicated that reciprocation is necessary, but not sufficient to establish consent. All participants were explicitly asked if reciprocation was the same as consent. Most participants did not think that reciprocation was a clear, sure-fire indicator of consent. Some participants identified that reciprocation could also indicate a person’s discomfort in the situation, rather than their enthusiasm for engaging in the activity. The context of the reciprocation seems to be embedded within the overall ‘vibe’ of the
moment. Many participants also stated that partners should be capable of discerning the difference between enthusiastic reciprocation, and reciprocation from discomfort. Some participants also described reciprocation that occurs because of discomfort as ‘passive’ behavior, while enthusiastic reciprocation was perceived as an ‘active’ behavior. The theme of Reciprocation, in the Greek sample, consisted of three subthemes: Intertwined, but distinct; embedded in vibe; and not consent alone.

Since the overwhelming majority of Greek participants indicated that there was limited, if any, verbal communication surrounding consent, the interviewer asked participants to indicate specifically how they determined their partners were consenting. This question is where most of the discussions concerning reciprocation evolved. When discussing how she could tell her partner was consenting, Callie focused on reciprocation as the primary means. “Look, he started and after I carried on, he didn’t stop me, and he carried on, so I believe this was the consent.” Callie’s statements provide a glimpse into the importance of active reciprocation. Theo describes a similar mechanism for gauging his partner’s consent, responding, “…from the body language and from the movements we both did, and the fondles.” Tim mentions that his partner’s body language was the key to his understanding of her consent. “Because she felt comfortable [allowing me] to go to her home and because when I kissed her, she didn’t show from the body language or anything that she didn’t want [to continue].” For Tim, gauging comfort from behavior and body language helps signal consent.

Daphne provided insight into how she determines consent through non-verbal means by explaining that body language, reciprocation, and chemistry play a role in navigating sexual situations. When asked how she could tell her partner was consenting she said, “Because there was no sign of resistance or hesitation. And there was chemistry, let’s say.” Here, Daphne’s
understanding of reciprocation is intertwined with the concept of Vibe; reciprocation, when consensual, functions as a product of the positive, sexually tense vibe experienced by partners involved in sexual situations. When probed to further explain with more specificity, Daphne stated, “When I come closer to him, and continue to hug him, kiss him, not to resist and to reciprocate to his movements. Sometimes, it doesn’t need words, I mean you can see from the movements of the other person. The body language.”

Althea’s description of reciprocation as a consent cue also contains enlightening information. “As I said there wasn’t any verbal comment but there wasn’t any movement, such someone step back or to stop, or to show that he has doubts, so I consider that it was consensual.” When asked how non-verbal cues signal consent, she added, “That he reciprocates and also that he makes a movement, I mean he will not be passive.” For Althea, consensual sexual experiences include a series of vacillating actions between partners, not a one-sided exchange. Callie expressed that she believes it is important to be able to determine if a partner is consenting to sexual activity through non-verbal means. “It is important to understand physically, in a non-verbal way, what the other person wants, we don’t need always to talk, I don’t need to reach the point to tell the other person no, to stop. I want to understand in other ways, too.” For Callie, the non-verbal, behavioral aspects of sex are just as important, if not more important, than the verbal aspects. Callie finds immense importance in understanding consent from multiple angles.

Participants were asked whether reciprocation is always an indicator of consent, which generated some interesting responses. For example, Theo’s response to the question highlights how some experiences with a lack of reciprocation are not necessarily lacking in consent, but how some situations do indicate non-consent. “It depends, if the one person doesn’t want that
much for reasons of doubts, meaning he doesn’t know if he wants [sex] that much, there I think it is not so consensual, I mean the other person should understand better if his partner wants. But for example, in cases that the one doesn’t want so much because he is tired, but he wants, then I think it is consensual.”

Theo acknowledges the context of the sexual encounter as being critical in understanding a person’s behavior in the moment, but also acknowledges how internal factors influence a person’s behavior, as well. Sophie describes how reciprocation does not always indicate consent. “Yes. Reciprocation can be caused also by awkwardness.” Awkward feelings, or feelings of uncertainty, can also lead individuals to reciprocate actions during a sexual situation.

Penelope also offers an alternate explanation for why reciprocation is not always a clear-cut sign of consent. “It's not always that because sometimes some people because of their weak character reciprocate but don't consent. That is something that you should be able to distinguish it, to be able to understand it. I think I understand it and I perceive it, but I always ask people. I don't take steps on my own, meaning I just let them take turns.” For Penelope, active reciprocation is the key to determining consent. Passive reciprocation could be a sign that someone is uncomfortable or does not want to continue.

Though there are many individual differences in the concept of reciprocation among participants, the patterns that emerged throughout the interviews depict that reciprocation is an essential, but non-determinant facet of consensual sex. Reciprocation alone does not constitute consent, because there are many means of reciprocating actions that carry with them distinct meanings. However, reciprocation exists within consensual sexual encounters in an active, critical way that is sometimes embedded within the overall vibe of the moments preceding and throughout the sexual encounter.
The American consent model presents almost as a process model, with a sense of comfort and communication interacting with one another and leading to the creation of the context for the encounter to occur, reciprocation occurring during the encounter, until the eventual closure of the encounter. Within the Greek model, participants presented their experiences in a less sequential and procedural manner. In multiple instances across the collected Greek data, participants discuss their sexual encounters in a much more fluid way, allowing an opportunity to see a complex interplay between categories.

Vibe was a key theme in the Greek sample, but it was often discussed in conjunction with the theme of Apprehension. At times, both Apprehension and Vibe were used to describe complicated feelings of sexual want, sexual tension, and concern for a partner’s comfort and/or pleasure. Yet, Reciprocation seemed nearly embedded within the Vibe theme. Participants in the Greek sample talked about Reciprocation being present even within the initial moments of sexual tension – whether it was partners reciprocating acknowledgement that they were both experiencing sexual tension, or partners reciprocating actions that led to a kiss that turned into a sexual experience, Reciprocation and Vibe seemed inextricably intertwined. Socially constructed boundaries also seemed connected to each of the other themes: a certain level of non-verbal and verbal communication was anticipated based upon socially constructed boundaries; an expected level of pre-sex apprehension was shaped by socially constructed boundaries dependent upon the context of the encounter. Further, participants indicated that even the sexual tension and reciprocating actions they described was considered normal based upon socially constructed boundaries. Therefore, generating a model that depicted these perspectives and experiences meant crafting a model that allowed for each of these to be distinct, but connected themes.

When crafting the model for the Greek data, I opted to ensure that it left room for
Sexual Consent in Greece and the United States

concepts that have yet to be explored, both concepts that are distinct but connected to the other themes, and concepts that may be entirely distinct from the others. The model shown in Figure 3 below demonstrates how consensual sex is comprised of Vibe, Apprehension, Communication, Reciprocation, and Socially Constructed Boundaries, as well as concepts yet to be explored. Figure 4 depicts each of the primary themes in the Greek data, along with the subcategories that shape them.

Figure 3: Greek model of consent
Convergence: Similarities and Differences in the American and Greek Models

Reciprocation in the Greek cohort carries with it many similarities to the American sample. In the Greek sample, all three subcategories of the American sample’s theme of Reciprocation were touched on – proximity as an indicator of reciprocation, mirroring actions as an expression of reciprocation, and slight escalations in sexual activity as an expression of reciprocation. However, Greek interviews expanded upon the theme of Reciprocation with distinct mentions of differences between ‘active’ and ‘passive’ reciprocation; clear, concise statements that reciprocation alone does not constitute consent; and explanations of why someone may engage in ‘passive’ reciprocation when a situation is not consensual. In these
interviews, Greek and American young adults communicated that reciprocation is necessary, but not sufficient, for consent.
Other similarities in themes are noticeable throughout the data, as well. The American sample’s Creating the Context for a Sexual Encounter theme bares striking resemblance to the Vibe and Apprehension themes in the Greek data. In Creating the Context for a Sexual Encounter, participants described mutually agreed upon plans to meet up for the purposes of sex as one way that sexual situation occur. During these mutually agreed upon meet ups, participants would go to a specific location, like a partner’s apartment, and engage in predictable behaviors, such as watching a movie. Participants typically described a level of sexual tension in the atmosphere during these pre-arranged meet ups, that propelled the sexual encounter along. American participants also described sexting and spending time together as mechanisms for creating the context of an encounter. In the Greek sample, Vibe was described as a sexually tense atmosphere felt by both parties that propelled the sexual encounter. Apprehension was sometimes discussed as a level of excitement for upcoming sexual activity that was sensed through the Vibe of the moment.

The Greek sample’s Socially Constructed Boundaries theme is quite like the theme of Communicating Boundaries Informs Consent in the American data. Greek participants spoke of mutually understood expectations between partners that were dependent upon how many prior sexual encounters the partners had with one another. If partners had never engaged in sex before, it was socially and culturally understood that STI and pregnancy prevention methods were of importance to both parties and were necessary for sexual activity to occur. Additionally, if partners were engaging in one of their first experiences together, there was an expectation that all sexual activity would be quite normative – neither party was expected to perform or request sexual activity that wasn’t considered ‘typical’ for most sexual experiences. Greek participants also described in discussions of reciprocation the necessity for both parties to be capable of
discerning one another’s boundaries and comfort level. In the American sample, participants discussed boundary communications as occurring primarily through acts of testing and accepting boundaries. These communications could be verbal or non-verbal, but typically consisted of small escalations or movements that indicated to their partner that they were attempting to see if those escalations and movements were welcome. American participants also described communicating boundaries prior to sexual activity, including exerting boundaries around activities and protection. Though the American participants did not seem to have many boundaries that were described as anticipated, the similarities between these two themes are clear.

The main difference between these primary themes is the theme of Closure of Encounter in the American sample – the Greek sample did not include many in-depth discussions of the end of sexual encounters. Despite this, the clear similarities between themes and subcategories within each dataset are impossible to ignore.

The cultural differences participants described were quite illuminating. Interestingly, young adults from the United States tended to discuss boundaries as being important, with some insight into culturally anticipated boundaries surrounding how the context for the encounter occurred, contraception, and a general expectation rooted in sexual scripts – how the flow of sexual activity tends to occur. However, the American participants did not emphasize contraception as an anticipated boundary of importance in the same manner that Greek participants did. Perhaps, this difference reflects that contraception is so normalized for American participants, that it need not be addressed with such gusto; or perhaps it reflects a sincere level of casualness towards contraception on behalf of American participants. Greek participants indicated that contraception was ‘taken for granted’, or that it was something that
was just expected to be used in all sexual situations, regardless of anything else. Young adults in Greece, in this study, emphasized clearly that contraception use was of deep importance to them, and was culturally understood as such.

Greek participants also seemed to approach sex in a more extemporaneous manner than American participants. Young adults in the Greek sample described knowing a situation would turn sexual based on the mutual feelings and sexual tension that existed between themselves and their partners, while young adults in America described a much more contrived process of entering a sexual situation. Despite both samples discussing sexual tension, American participants tended to describe this sexual tension as a step in the process of sex, rather than as a naturally flowing occurrence weaved within a sexual experience.

Reciprocation was a critical element that was brought up naturally by participants in each sample, then probed further into with the encouragement of the research team. Through these probing questions, researchers were able to ascertain that young adult participants in America had varying views on reciprocation, with some believing that mirroring actions was a clear sign that a person was reciprocating, and others communicating the belief that mirroring actions was ‘bare minimum’ and could be cause for concern. However, Greek participants contributed a meaningful distinction to this conundrum, by describing the difference between active and passive reciprocation in their stories. Greek participants clearly explained how the ‘bare minimum’ activity that American participants described was more passive in nature, while active reciprocation was more aligned with the idea of reciprocation as mirroring actions with small escalations. Of note in these discussions was an interesting difference between almost all of the American and Greek participants. In most of the American interviews, when the researcher asked if reciprocation alone was equivalent to consent, American participants vehemently opposed the
idea and noted that reciprocation is a component that could exist within the frame of consensual sex but was not clear enough on its own to be construed as consent. However, when most Greek participants were asked the same question, they initially indicated that reciprocation and consent were synonymous, only clarifying that it was not consent when probed to explain why they felt the two concepts were one in the same. Their descriptions of why brought forth the discussions on active and passive reciprocation that added immense value to the theme, and to the overall study.

Through the iterative process of CGT, each of these primary themes, and their subcategories, were rigorously compared to one another to determine if further themes would emerge. Eventually, the primary themes of the American and Greek models were converged into three principal themes that describe consensual sexual activity, embedded within data collected from the Greek and American interviews. These principal themes are comprised of subcategories that emerged from the subcategories for the primary themes in the Greek and American models of consent.

Between the Greek and American models, the themes of Socially Constructed Boundaries, Communicating Boundaries Informs Consent, and Feeling in Control Allows for Communication, along with their subthemes, were collapsed into a single unifying principal theme: Socially Constructed Expectations. The subthemes that comprise Socially Constructed Expectations are Similar Boundaries, Communication, and Autonomy. That is, the Socially Constructed Expectations that are present during any consensual sexual encounter are expectations that all persons involved in sex will have similar boundaries; an anticipation that some form of communication will occur prior to and during consensual sexual encounters; and a presumption that all parties involved in consensual sex have full autonomy and are capable of
exerting full autonomy throughout the situation.

The overarching principal converging theme of Catalyst to Sexual Activity collapses the Greek and American themes of Vibe, Apprehension, and Creating the Context for a Sexual Encounter. The subthemes that comprise Catalyst to Sexual Activity are Sexual Tension, Pre-arranged Plans, and Predictable Patterns of Preceding Behavior. Sexual tension, pre-set plans, and predictable, patterned behavior that occurs right before a sexual encounter happens set the tone for consensual sex to occur – they represent the initial spark that happens prior to sexual activity.

The way a person behaves throughout the course of a sexual encounter is critical to understanding consensual sex. As such, Behavior Throughout Sexual Activity is the final overarching theme of the convergence model. Behavior Throughout Sexual Activity contains three subthemes that represent behavior that can occur during consensual sex. Reciprocation, Escalation, and Interruption are all behaviors that can be present during a consensual sexual experience. Reciprocation indicates mirroring actions that are either active or passive in nature. Escalation represents small, slight escalations in sexual activity between partners that allows the sexual experience to continue and merge from one activity to another. The subtheme of interruption was included to preserve the consensual experiences described by participants where sexual activity began and then was stopped. This category represents experiences where partners decide to end an encounter for any number of reasons – one partner is uncomfortable, a partner is not into the activity, partners are tired and want the sexual activity to end, or a multitude of other reasons that partners may decide to end sex with acknowledgement that all activities were consensual when they occurred. A key component of Interruption is partners respecting one another’s desires. If a partner attempts to interrupt sexual activity and that is ignored, the
Sexual Consent in Greece and the United States

encounter may no longer be consensual.

The three primary themes of the convergence model are embedded within one another. All themes represent concepts that are encompassed by consensual sex. The Catalyst to Sexual Activity and Behavior Throughout Sexual Activity are nested within Socially Constructed Expectations, which are all fixed within Consensual Sex. Figure 6 illustrates the convergence model.

![Convergence model of consent among American and Greek samples](image)

**Figure 6: Convergence model of consent among American and Greek samples**

This model intentionally focuses only on components of consensual sex. As such, the aspects of the model that are nested within consensual sex operate as features of consensual sex. The visual used to depict the convergence model establishes consensual sex as a standalone concept that is defined by the characteristics comprised within. When engaging in consensual sex, partners in Greece and America brought to the experience a set of socially constructed expectations – not only for what consent is, but also for what types of sexual activity,
communication mechanisms, and boundaries would be present throughout their encounters. While the behavior expressed throughout sexual activity helps individuals navigate,
communicate, and interpret consent, it is also shaped by the socially constructed expectations that individuals carried into all phases of their sexual experiences. The catalyst to sexual activity exists both in conjunction with behavior throughout sexual activity and as a function of the socially constructed expectations partners bring into sex. Behavior throughout sexual activity *includes* behavior that occurs prior to and during the catalyst. However, the social expectations surrounding behavior throughout sexual activity are intertwined with *and* distinct from the social expectations surrounding the catalyst to sexual activity.
Chapter V: Discussion

This work began as an exploratory dive into EBSCOhost to understand how two individuals could have vastly different interpretations of the same sexual encounter and evolved into identifying and addressing an inherent need for research on sexual consent. In the early stages of developing this study, the purpose was to determine what sexual consent is, at its core. In a very prescriptive, academic way, approaching this research was solely focused on pulling apart the layers of interaction that occur during sexual encounters to identify what best explained consent. Once data collection began, the purpose of the study expanded. It was no longer supremely important to dissect the idea of sexual consent. It was most important to empower participants, obtain a profound understanding of their experiences and perspectives, protect their rights, and diligently work to portray their stories in a meaningful, accurate manner laden with theory.

The complexity of the why of this research resembles the complexity of the concept studied itself. There is no procedure that exists for simplifying sexual consent, or the reasons that gaining a fully developed understanding of sexual consent are of such incredible importance. This study serves to glean in-depth insight into the nuanced nature of consent, and to uplift the voices of the young adults whose bravery is characterized therein through their shared experiences. This work intends to build upon all the research into sexual violence, sexual violence prevention, and sexual consent. Deriving an understanding of sexual consent is imperative to improving sex education, refining sexual assault prevention efforts, and improving sexual interactions between partners. Though this study could not achieve a full picture of what consent is, it offers another glimpse into the concept that incorporates perspectives from young adults in two countries.

In the American model of consent, participants described their consensual sexual experiences in a procedural manner, resulting in a process model of sorts. Participants in the
American sample described communicating consent in both verbal and nonverbal ways. One of the key findings in the American sample was the notion of reciprocation. American interviewees described reciprocation as physical proximity to a partner, actions that mirrored their partner’s, and slight escalations in sexual activity. Reciprocation was oftentimes a nonverbal means of communicating consent, though it is a distinct expansion of the idea of nonverbal consent communication. Prior studies have explained that there are differences between verbal and nonverbal communications of consent, in addition to describing differences between direct and indirect communication mechanisms ((O’Sullivan & Gaines, 1998; Muehlenhard & Peterson, 2005; Peterson & Muehlenhard, 2007; Beres, 2010; Muehlenhard et al., 2016). Muehlenhard and colleagues described sexual consent as an internal state of willingness, an act of explicit agreement, and behavior someone else interprets as consent (Muehlenhard et al., 2016). Tacit consent was explained as a sense of ‘just knowing’ that a partner was consenting to sex (Beres, 2010). The American theme of Reciprocation rests somewhere between an act of explicit agreement, tacit consent, and behavior someone else interprets as consent.

Reciprocation could be viewed as behavior someone else interprets as consent if a partner experiencing reciprocation finds this reciprocating action to be indicative of consent to the activity. A clear relationship exists between tacit consent and reciprocation, as American participants described reciprocation as one way that they knew their partners were consenting – especially when the reciprocating action was a slight escalation in sexual activity. When reciprocating actions are coupled with direct, verbal expressions of consent, they could also be an act of explicit agreement.

Participants in America described communicating about boundaries in three ways – prior discussions of boundaries, testing boundaries, and accepting boundaries. Testing and accepting
boundaries seem strikingly similar to reciprocating actions at times, though. Participants sometimes described a partner testing a boundary in response to an initial action. For example, one participant described a male partner getting closer and closer to her breasts as they were making out, in response to them moving from non-sexual activity to making out. This was a slight escalation of the situation, as is often described through reciprocation, but was also an instance of testing boundaries. The interconnected nature of themes within both the Greek and American samples led to the development of a combined model, where primary themes were collapsed into one another.

Greek participants also described reciprocation in their interviews. These depictions of reciprocation contained all the aspects of reciprocation identified in the American sample, but also expanded upon the concept of reciprocation. Greek participants often described reciprocation when discussing those early stages of a sexual encounter, where individuals beginning touching, kissing, and identifying that the situation has the propensity for sexual activity. Participants in Greece also clearly stated that reciprocation alone was not enough to constitute consent, and expanded on their meanings by adding examples of scenarios where a person might reciprocate a partner’s actions but not actually be doing so consensually.

Another critical theme in the Greek sample was the concept of socially constructed boundaries. Time and time again, interviewees indicated that there were socially acceptable boundaries and expectations that partners had when entering a sexual activity. This was frequently described as ‘normal’ activity being assumed – partners who were engaging in early sexual experiences with one another mutually understood, through culturally-shaped expectations, that unusual sexual activity was not going to occur at that time. For example, early sexual experiences with new partners do not typically involve specific fetishes. These key
insights help shape understanding of what constitutes consent.

The similarities between socially constructed boundaries in the Greek sample and the themes communicating boundaries informs consent and feeling in control allows for communication are not quite as obvious as the similarities between both reciprocation themes. Communicating boundaries informs consent occurs through the processes of prior discussions, testing boundaries, and accepting boundaries. Feeling in control allows for communication is explained as a sense of comfort that stems from positive prior experiences with a partner and the strength of the bond between partners. When diving deeper into the data that informed these categories and themes, it was apparent that the sense of comfort American participants described, along with the boundary discussions and processes of testing and accepting boundaries were all indicative of expectations participants had upon engaging in sex with partners. American participants were primed for the process of testing and accepting boundaries prior to engaging in sex, whether they had prior boundary discussions or not. In this way, testing and accepting boundaries represents a socially understood and informed expectation.

Boundary discussions were discussed openly in American interviews; but there were also clear mentions of boundary discussions in the Greek interviews. Though it was less common to discuss specific boundaries surrounding STI and pregnancy prevention because these types of protection were of assumed importance to most participants engaging in sex, participants did indicate that there were brief mentions of these at the initiation of sex. Partners may not have had as in-depth discussions about boundaries as American participants indicated, but there were multiple instances where Greek participants initiated a move from one type of sexual activity to penetrative vaginal-penile sex by asking about the presence of condoms. American participants also described how some form of communication about boundaries was anticipated when
Sexual Consent in Greece and the United States

engaging in sexual activity with newer partners; with long-standing sexual relationships, American participants said that these boundary discussions were not anticipated because those boundaries had typically already been established between partners.

When American participants described gleaning a sense of control from the strength of the bond they had with sexual partners, their descriptions did not exclusively pertain to long-standing sexual partners. Though the positive prior experiences with long-standing sexual partners and the bond between these partners absolutely shaped a sense of control, these were not the only types of relationships where these concepts were salient. American interviewees also explained that forming a bond with a new partner prior to sexual activity through sexting, spending time together, or going on a date also influences their sense of comfort and control in the situation. A good date where both partners were enjoying themselves and experiencing some sexual tension could lead to partners feeling a sense of comfort and control at the onset of sexual activity. These descriptions resemble those of the experiences Greek participants described when discussing the theme of vibe, which shows yet again how themes within this study are intertwined with one another. However, one other clear similarity described throughout these discussions is partners feeling safe and comfortable, despite sexual tension or concern for their partner’s comfort and pleasure, is a sense of autonomy. At the core of comfort, control, or safety participants across both samples were describing their understanding and sense of autonomy over their own sexual decisions with partners.

The parallel and congruent nature of the primary themes and subcategories in the Greek and American samples presented the opportunity to identify overarching, essential themes that represent the stories of Greek and American participants. Thus, the convergence model incorporates the most fundamental aspects of consent represented across both samples of data.
Sexual Consent in Greece and the United States

This model embeds those initial moments when participants recognize sexual tension and see the potential for activity to turn sexual, as well as the behaviors of partners throughout sexual activity, within the socially constructed expectations participants carry into sexual experiences. All these themes comprise consensual sex. Though this model contains subthemes that are specific to and embedded within this data, I believe it has the potential to be flexible enough to apply to other cultures.

A clear literature gap discussed throughout this manuscript focuses on the sheer lack of research exploring sexual consent in Greece. No Greek studies were identified that scrutinized sexual consent, and other research indicates that no Greek studies have reviewed sexual assault among Greek college students (Dworkin, Krahe, & Zinzow, 2021). Given this information, it is possible that this is the first research study examining sexual consent in Greece. Even if Greek research exists that explores sexual consent that was not included, this still represents one of very few pieces of research that does so, addressing an extremely important gap in literature.

More research into sexual consent has been conducted in the United States, though most of these studies discuss an obvious need for more work in this area. The present study works to address that need, as well. Importantly, many of the key findings in this work are concepts that either have not been discussed in previous American consent studies or are budding concepts that have only recently been included in other studies. The primary theme of Reciprocation identified in the American model of consent is a concept that has only recently been noted in other studies and is explored most in-depth in the present study. Finding Reciprocation as such a salient theme in the Greek sample demonstrates that the behaviors involved in reciprocation are cross-culturally recognized to some degree and are a fundamental component of consent.

American participants spoke at length about how feeling safe and in control of their
decisions and actions was crucial for their experience to be considered consensual. In none of the aforementioned studies was there such an emphasis on a sense of comfort and control, indicating that these facets of consent are being newly explored here. Greek participants emphasized the intrinsically essential role that sexual tension, or vibe, plays in consensual interactions. Though sexual tension and similar notions are not new in the domain of consent research, Greek participants indicated that their initial interpretations of sexual situations were greatly informed by the sexual tension experienced. Participants in the Greek sample also brought forth the intriguing and critical idea that there are socially derived boundaries and expectations that individuals bring into sexual encounters. Identifying these pivotal aspects of consent not only assist in addressing the research gap, but also directly connect to the goals of gleaning in-depth insight into what constitutes consent and honoring participants’ stories.

Regardless of the novelty of some of the emergent themes in American and Greek data, the importance of this study is also housed within its intention to expand understanding of consent. Prevention and education efforts surrounding sexual consent are fruitless if they do not contain information about consent that is rooted in research. Therefore, prevention and education efforts necessitate quality research that explores sexual consent. To that end, this study contributes to prevention and education in a limited, but necessary way.

Future research into consent is still needed to develop a full and holistic repository of knowledge. The convergence model that emerged in the present study should be rigorously tested to see if it truly could apply to other cultures. Qualitative inquiry into sexual consent in other cultures, among other age groups, and with specific attention to sexual orientation, gender identity, and ethnicity is crucial for developing a more comprehensive and inclusive understanding of sexual consent. Studies deploying a mixed-methods design could also benefit
this field of inquiry.

Another approach to exploring and confirming the foundational concept of sexual consent could be exploring experiences of sexual assault and comparing those experiences to data collected about consensual experiences. This daunting task could be imperative to recognizing the differences between consensual and non-consensual activity, which could further inform theory. Research that analyzes current sex education curriculum content on sexual consent may also carry tremendous benefit. How do existing sex education curriculums describe, explain, and explore sexual consent? Are these methods empirically supported?

Crafting curriculum or trainings that help individuals conceptually understand consent, navigate sexual interaction, communicate and interpret consent to sex is another realm that needs attention. Utilizing existing work on consent and generating educational content on the topic that could be piloted, researchers could test the outcomes of the content to help inform best practices for consent education. The work that remains within the domain of sexual consent is nearly limitless – a notion that researchers should find both daunting and inspiring.

Limitations

Despite any researcher’s best intentions, no studies are free from limitations. This research is no exception. It is possible, if not likely, that language barriers and cultural differences impose limitations upon this study. Though researchers were conscientious about data collection, transcription of interviews, and clarifying meanings, some of the meanings interpreted when reviewing data that was collected in a language not native to the researchers could have been misinterpreted. If this occurred, some of the analysis could be skewed, or an inaccurate representation of the participants’ meanings.

Since the use of AI transcription services are relatively new within qualitative research and
few guidelines existed when the data for this research was transcribed, the use of these services could cloud the data and result in inaccurate representations of participant meaning. Great care was taken to ensure accuracy of the transcribed data, but that does not eliminate the possibility that the transcriptions contain errors or misinterpretations.

A critical limitation in this study is the lack of diversity among participants. In the American sample and the Greek sample, participants were strikingly similar. Most participants described their sexual orientation as straight, so there was an obvious lack of representation for the Q+ community. Race was not a demographic that was analyzed or reported due to the small sample sizes, which may mean that there are racial differences in consent conceptualization, communication, and interpretation that have yet to emerge. None of the American participants self-described their gender as male, marking another pitfall of this work. American males are not represented within this research; thus, their perspectives could hold distinct differences that are necessary to developing a complete understanding of consent.

Another primary limitation in this study was the discrepancy in sample size. The Greek sample had twenty participants, while the American sample only had ten participants, who were all self-described as female. There is a possibility that themes may emerge or be altered when additional American participants are interviewed. Though this is a limitation of this dissertation, researchers are continuing to collect data in the United States so as to correct this in future publications of this work.

All participants across both samples described heteronormative sexual situations, regardless of whether they described their sexual orientation as heterosexual or bisexual. While this could be a limitation of the present study, perhaps it also demonstrates that participants have been socialized to think of sexual consent as a concept only referred to in heterosexual situations.
This is a research question that could be explored further in the future.

Conclusion

The complexity of sexual consent is inherently evident when reviewing research exploring the topic. Whether consent is an action, a series of actions, an internal state that is unknowable without explicit communication, or some other tangible or intangible element, a comprehensive understanding of sexual consent is imperative to the future of sexual assault prevention and sex education. The present study presents consent as being represented by both internal experiences and external expressions (whether direct or indirect), that are informed and shaped by sets of socially derived expectations for what occurs during consensual sexual activity. This study also provides some preliminary evidence that consent may also be similarly understood and expressed across cultures; though further exploration of this is necessary to determine if this is true. Within this research is also evidence that specific mechanisms exist that make up consensual sexual interactions, though this also requires further investigation to confirm. Despite additional research needed to a glean clear and exhaustive understanding of consent, this study contributes to the existing body of research in novel and critical ways.
Sexual Consent in Greece and the United States

References


Sexual Consent in Greece and the United States

https://doi.org/10.1080/14681811.2019.1621744


Darden, M.C., Ehman, A.C., Lair, E.C., & Gross, A.M. (2019). Sexual compliance:


Sexual Consent in Greece and the United States


Sexual Consent in Greece and the United States


of students in higher education. In Ann W. Burgess (Ed.), Rape and sexual assault (pp. 3-25). New York: Garland.


Sexual Consent in Greece and the United States


https://doi.org/10.1080/00224499.2020.1767023

https://doi.org/10.1080/23808985.1996.11678928


Sexual Consent in Greece and the United States

186-196. https://doi.org/10.1037/0022-0167.34.2.186


Sexual Consent in Greece and the United States


https://doi.org/10.1177/0146167295213004


https://doi.org/10.1080/14681811.2018.1510769

issues, future directions, and the potential efficacy of interventions with women.

*Clinical Psychology Review, 19*(7).


Shannise Luebbering-Jones is a Doctoral Candidate in the Department of Educational, School, and Counseling Psychology at the University of Missouri-Columbia. She has conducted research into the conceptualization, communication, and interpretation of sexual consent.