Queers, Bullying and Schools: Am I Safe Here?

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SUMMARY. This article reports on interviews conducted with students and educators in various Toronto-area high schools in an attempt to gauge how and to what extent so-called “formal” law (laws, policies, regulations) interacts with other, sometimes, competing normative orders, such as gender codes, sexuality, race, religion, in the educational setting. This approach is necessary to understand how anti-harassment and anti-homophobia policies are complicated by these other regulating influences.

KEYWORDS. Bullying, Canada, educational policy, homophobia, laws, legal pluralism, school culture, secondary education

[If there be a portion of a society’s life in which tensions of the culture come to expression, in which the play of variant urges can be felt and seen, in which emergent power-patterns, ancient views of justice tangle in the open, that portion of the life will concentrate in the case of trouble or disturbance. Not only the making of new law and the effect of old, but the hold and the thrust of all other vi-
tal aspects of the culture, shine clear in the crucible of conflict. (Llewellyn & Hoebel, 1941, pp. 28-29)

In Canadian secondary schools, teachers are purveyors and sentries of subjectivities of culture, expected to share in the formulation and safeguarding of a normative social order (Manley-Casimir, 1994, p. 3). The Education Act of Ontario, for example, expressly defines the task of teachers in sharply uttered language. Under this 1990 legislation, teachers must

> inculcate by precept and example respect for religion and the principles of Judaeo-Christian morality and the highest regard for truth, justice, loyalty, love of country, humanity, benevolence, sobriety, industry, frugality, purity, temperance and all other virtues. (s. 264(1)(c)).

As in Ontario, British Columbia obligates its teachers to assume a statutory duty to “ensur[e] that students understand and comply with the codes of conduct governing their behaviour and with the rules and policies governing the operation of the school” (School Act, 1996, Ch. 112, C.B. Reg. 265/89, s4(1)(c)). The obligation is couched in less “moralistic” language than the Ontario legislation; however, the position of teacher-as-cultural-agent is clear.

Ccombating the bullying of lesbian, gay, bisexual and transgendered (LGBT) youth requires policies which take into account the unique position of this group. I have undertaken ethnographic research of students at various high schools in Toronto to consider the potential of anti-discrimination and anti-bullying policies. There is a large and growing body of research dealing with safety issues surrounding LGBT students in schools (Pepler, Craig, Ziegler, & Charach, 1993; Walton, 2003). Many studies and scholars conclude that schools must implement anti-harassment and anti-bullying policies that specifically include queer students, generally referring to their sexual orientation. I would agree with this conclusion; however, my research goes beyond this argument by considering the interacting forces of formal and informal regulations.

The research literature on bullying has not investigated the overlaps and gaps of two regulatory processes: the role of the law as an active participant in a cultural process that seeks to end bullying; the normalizing culture of the daily life of schools in respect of gender, sexuality and other norms, which complicates and interacts with formal law. My work
undertakes a consideration of what is meant by “the law” in an educational setting, employing the socio-legal approach of “legal pluralism” as one means of gauging the reach of formal law to penetrate youth culture.

This study was undertaken with a consideration of schools as a site where teachers and school-based administrators function as agents of culture where dominant gender codes and norms of sexuality are reinforced. However, my examination of schools as cultural agents was complicated by a consideration of anti-discrimination and equity policies in the Toronto District School Board. These policies recognize the role of schools as cultural agents, but seek to create an environment equally secure for all students regardless of gender, sexual orientation, and other characteristics used pervasively in practices of social subordination.

This article explores how and to what extent formal law or state law interacts with other normative orders in the educational context such as religion. State law addresses certain problems in schools, but is compromised by failing to account for the perpetuation of social norms within youth cultures. It is the hegemony of these norms that inculcates negative notions of difference, leading to homophobic bullying and other forms of violence. LGBT youth are, thus, easy targets despite state law or school policy.

GOALS AND METHODOLOGY

The goals of my research were: (1) to define the nature of the discriminatory harassment and violence directed at queer students by other students in high schools; (2) to observe the ways in which queer students challenge, and cope with, these barriers to secure and equal education; (3) to outline the ways in which school policies and the law seek to acknowledge and overcome these problems; and (4) to document the complexities of successfully achieving secure and equal access to education for queer high school students.

I spent four months in nine high schools within the Greater Toronto Area observing students interact in classrooms and in the schoolyard. The main component of my data collection was interviews with students, teachers, and administrators to investigate how and to what extent safe school legislation, school anti-harassment policies interact with other, complicating normative orders.
In this context, my investigation has included formal, state law at different levels (e.g., constitutional law), more informal state law at different levels (e.g., administrative decisions), and rules or normative systems (e.g., gender codes and codes of youth culture) developed and applied by non-state actors that operate, in practice, much like law. Therefore, it was critical to include as interview subjects students who self-identified as members of a gender or sexual minority or were identified as such by other students.

How did I find these queer students? Teachers, committed to making a difference at particular schools, opened their doors to me, allowed me to sit in on classes day after day, and, most importantly, encouraged students they knew to be queer to speak with me. The teachers who granted me access to their students (and other teachers who did not) also described their teaching experiences through formal interviews. As I spent time in their classrooms, these conversations also included informal “day-to-day” conversations that unfolded over the days or weeks spent in their schools.

I interviewed approximately three to five “out” students at each location. Limiting my interviews to students who identified as queer meant that there was a small pool from which to draw. I discovered that it was difficult for me to locate five students at each school who were “out” and willing to go on the record to discuss harassment with me. Not surprisingly, only at Triangle, a program exclusively serving LGBT youth, was it possible to find five young people willing to talk.

I was particularly interested in student awareness of anti-harassment policies, their assessment of the implementation of those policies and the details of the “day-to-day” experiences of queer students. Some students, understandably, had more to say than others; as a result, the length of the interviews varied from 60 minutes to two hours. My interviews with Azmi Jubran and Gabriel Picard were substantially longer. All interviews were tape recorded and transcribed.

Queer students may resist in self-identifying through a simple male-female binary, choosing instead to place themselves somewhere along a male-female continuum. Others may see them this way as well. They may organize socially and politically across gender lines, by forming LGBTQ clubs or Gay Straight Alliances. For this reason, I also interviewed several students who did not identify as LGBTQ, but who were, nonetheless, subject to this kind of harassment by their peers. Such was the famous case of Azmi Jubran, a male heterosexual student in North Vancouver. Targeted for being “gay,” he was subjected to five years of harassment in high school by students, boys and girls, and teachers.
There is an obvious trade-off between having a reliably representative sample (more likely with bigger numbers) and logistical limitations on the depth and quantity of interviews I could undertake. Five at each school still seemed sufficient to get a good sense of students’ concerns and experiences. Moreover, I was never concerned with making an argument that these experiences were conclusively representative. Rather, I was, as ethnographers are, more interested in the richness of detail made possible by a smaller sampling.

One question I considered was whether or not to focus solely on a specific gender. However, it struck me as problematic to insist on focusing on subjects on either the male or female side of an essentialized gender binary, the very binary queer students often seek to challenge (or fit within, or both). If I had focused solely, for example, on male students, presumably this would mean interviewing only students who identified as males and this would leave out gender rebels of various stripes, including Jade. This grade twelve male student returned to school in January having decided to present as a female for the final six months of high school. Therefore, I chose to interview queer students with no gender restrictions—queerness or perceived queerness being, then, the interview criteria.

Equally, I considered whether or not to include so-called “straight” students. For many practical reasons, I decided not to do this. But, the argument to do so is certainly there to do so and it is certainly, I think, a place for future research. So in the end, my interview subjects were and are students who identified as queer (by which I mean self-identified or identified by others).

As for age, I was inclined to prefer students in the higher grades, simply because they have had more experience in high school and may be more reflective, articulate, and perhaps more open about talking. There was also an enormous practical consideration: students in the upper years were very likely to be 18 years of age. Interviewing people who had recently graduated, like Azmi, was very helpful, too, because they had less reason to fear retribution and have some distance from and hence perspective on their high school experiences.

LEGAL PLURALISM AND SCHOOLS

Beginning with an analysis of formal law, I examined school board and legal documents that were specifically written to look at what schools were doing (in some cases compelled to do) regarding sexuality and harassment. These included the Codes of Conduct of selected high
schools throughout Toronto, and the Toronto District School Board Equity Foundation Statement and Commitments to Equity Policy Implementation. Another crucial publication in this review was *A Teaching Resource for Dealing with Controversial and Sensitive Issues in Toronto District School Board Classrooms*, which gives expansive consideration to the Board’s Foundation Statement, as well as proposing demonstration lessons for grades nine to twelve. Of course, I considered the requirements of legislation, particularly *The Safe Schools Act* as it was incorporated into Ontario’s *Education Act*.

The *Ontario Safe Schools Act* (2000) dramatically altered the carrying out of student discipline in the province. It was enacted “to promote the safety of people in schools” and was intended to ensure that “. . . all members of the school community, especially people in positions of authority are treated with respect and dignity” (s. 301.[1]). Since policy is often about direction and intention, my research question directly comes to bear on the stated purposes of the Act. In all the policy discussions leading up to passage of the Act, what was meant or intended by “safety” in discussions about making schools “safe” for “people”?

The requirements imposed by the Safe Schools Act can be divided into two types. First, the Act requires principals, school boards, and administrators to implement various proposals or initiatives to promote a safe school environment. Second, the legislation imposes procedures which govern student discipline in schools. The Act includes both “mandatory” and “discretionary” discipline provisions, procedures to be used in handling “violent” incidents, which included suspending and expelling students. Certain provisions called for “zero tolerance” of physical violence.

Although these laws and policies remain in force, their impact on queer youth is problematic given the structural changes instituted by the Harris government in Ontario. In January, 1998, Ontario Premier Mike Harris amalgamated the Toronto Board with five other Metro Toronto school boards to create the Toronto District School Board and took control of funding for education. Jobs were cut and social programs scaled back. No longer were statistics kept with respect to the quantity of harassment complaints or bullying incidents—and certainly not with respect to sexual minority students. Neither were there qualitative data being sought; no longer was anyone taking down the details of these incidents, which are for some, tantamount to the day-to-day experiences of queer students throughout their time in high school. Therefore, only by collecting anecdotal evidence and giving voice to the subjects stud-
ied is a vivid picture—or any picture—likely to be captured and presented on behalf of students frequently subjected to homophobic bullying.

There is always a bit of a terminological conundrum with an approach centered around legal pluralism, which is premised on a broad view of “law” (as inclusive of multiple normative orders). It is difficult to avoid referring to “law” in the traditional sense. I think this can cause confusion. I was tempted to qualify the traditional understanding of law by the adjective “state” or “official” or “formal” since these refer to a centralist notion or traditional understanding of what constitutes law. I try to avoid saying “law” alone—although in a strictly pluralist sense, perhaps one should refer to all of the various normative spheres of influence, including “state law,” simply, as “law.”

In their efforts to investigate social behavior, legal pluralists do investigate official or state law and acknowledge the significance of its conduct (Arthurs, 1985; Merry, 1988). But these socio-legal scholars also include other forms of social regulation that function throughout society and function as though they were law. Thus, legal pluralists study ways in which other forms of regulation outside “formal” law-legislation, regulations, policies, and judicial decisions operate as “law.” Therefore, in the educational context, it is important to hear from students about the powerful effects of codes of gender, sexuality, race, class, family, and religion. Similarly, the various aspects of “youth culture,” particularly the high value placed on the “anti-snitch,” in which students operate inside and outside the classroom, are equally, if not often more powerful and determinative of students’ behavior than the formal regulation of the educational environment.

This pluralist approach is necessary when contemplating how and why it is that “formal law,” which can be sympathetic and purposively supportive of “queer youth”—particularly in the Toronto District School Board Foundation Statement—struggles to lessen the harassment and bullying of these students. For the purposes of this article, it is not necessary to make any determination on whether or not these other normative orders, apart from state law, actually rose to the level of “law.” Here, I am interested in applying principles of pluralism to determine how formal and informal modes of regulation interact.

**VOICES FROM THE FIELD**

Almost all the students and teachers with whom I spoke, in one way or another, articulated concerns that formal law was limited in its reach into youth culture. Formal law was viewed merely as one of a number of
normative regimes operative in that culture. Most students did not use this vocabulary to describe their views, although some did. Whatever their word choice, they agreed that other normative orders—"law" in the pluralist sense—compete, complicate, and sometimes defeat the anti-bullying and harassment strategies contained in legislation and policies of formal law.

The Toronto District School Board has one of the only equity policies in Ontario that includes an explicit anti-homophobia policy. Students and teachers rarely articulated difficulties with these policies. Rather, at some schools, they believed the policies were undermined by a lack of administrative will to enforce them.

Numerous times, I heard from teachers that very often it was the political nature of the vice-principal’s office that kept the policies from being implemented. These vice-principals, according to these teachers, have their eye on a higher position within the school board and do not wish to deal with what are still controversial policies for some—particularly parents. Frightened of appearing to be in support of same-sex relationships and especially same-sex marriage, these vice-principals do not support specific school initiatives to implement Board policies. English teacher Ted Richards said:

one of the problems with anti-bullying policies is that our VP feels that he needs community support before he can enforce these policies. This community is made up of many Christians and many Muslims and the VP knows how they will react.

In other schools, even where there was support from the school administration, those who worked hard to implement the policies felt that youth culture itself was sometimes impervious to their efforts. Few were willing to give up, however. Naomi, a seventeen-year-old student, believed that youth culture would continue to reject "concern for queer concerns" unless long term efforts were made to deal with more than just incidents of harassment:

If you just punish people for like homophobic attitudes and stuff like that, or like incidents of outright homophobia when there’s people attacking other people, it’s not gonna help. I think it’s about changing the attitude, the root of the problem, not just like the isolated incident.

And you gotta start young, right? By implementing programs in school like they do with antiracism programs. There’s Black History Month; there’s all sorts of things like that, but there’s
nothing for gay people. I mean, like, we have Pride and groups like the GSA, Gay-Straight Alliance. I know they just started that at my school. But it was kind of like a joke, like they were just for teachers, right? I feel like there’s not a lot of focus on what’s needed to get through to students.

Brian is a gay, 18-year-old, grade twelve student who spoke about his all-Catholic school in the west end of Toronto. He felt that many students in his school, who were very tied to family values, clearly enforced strict codes with respect to religion, gender and sexuality. These affected their attitudes about homosexuality. Although his home situation was similar to many students at his school, Brian had rejected those values:

My mom is old year Portuguese kind of woman and she was raised Portuguese and that culture is not really the most gayest [sic] friendly culture. It’s where a man is supposed to show a hyper masculinity as a man. It’s like, this is what a man’s supposed to be. You can’t show emotions. You have to be strong. You can’t be a faggot. You have to fuck all these women. It’s like—and it’s—we’re in Canada now, but still no difference. She still has that value . . . . That’s who dominates at this school, Italian, Portuguese, Spanish and Black.

I attended an all-day queer anti-bullying conference at a Toronto high school. This event is arranged every year for incoming grade nine students. Even in schools, such as this one, where anti-harassment policies were being implemented and actively supported by teachers and the administration, I observed the kind of thinking about gender coding and sexuality articulated by Brian. Some students heckled from the back of the auditorium. Others, though silent, conveyed through body language their disapproval of what was being said. Still others yelled derisively as they made their way out of the auditorium. The students who yelled made unintelligible noises, cloaked in the protection that comes from being part of an anonymous crowd. Nonetheless, a teacher did grab a microphone to quell the outbursts, but there were no identifiable individuals to implicate.

Nonetheless, physical harassment of “out” students had declined since the initiation of these assemblies, as well as the presentation of other “gay positive” events in the school put on by the Rainbow Alliance, a group of queer high school students, and by TEACH and
SpeakOUT, queer positive groups that visit high schools in Toronto to provide anti-homophobia education. Students, teachers, and administrators I interviewed noted the considerable effect of older students upon the incoming grade nine students—queer and non-queer.

Generally, the schools I visited, including those outside the Greater Toronto Area, could be classified into three categories, in relation to their policies dealing with harassment and bullying. First, there is the largest category of schools and school boards throughout the country (e.g., Thunder Bay) with no specific policies dealing with harassment and certainly not homophobic harassment. The vast majority of schools would fall into this category.

Second, there are school boards (e.g., Toronto District School Board) in which some of the best anti-harassment policies (which specifically include homophobic harassment) exist, but which remain unimplemented at some schools. Tony is a twenty-year-old recent high school graduate. He described his school in North Toronto where probably few teachers were aware of the policies or knew them very well. It was only a few teachers that I worked with in the Rainbow Alliance who informed me of this and one of them had a copy of it. But I wouldn’t say that there was much awareness of direct observation of these policies in my school.

Deb, a self-described “gender fuck,” 18 years old and in grade twelve, described a similar situation at her school: “I think the dissemination of policy was probably very scattered at best. I think it may have been in the hands of the administrators. I’m sure there were administrators who weren’t aware of the finer points of it.”

In the third category are schools (e.g., the Toronto District School Board) where some teachers and administrators seek to implement the policies—and, in sometimes, do an excellent job. At these schools, however, the effectiveness of the policies is complicated by the presence of other normative orders.

Andrew was very direct in his assessment of why policies were hindered at his school. Notwithstanding some excellent efforts by teachers to create a positive environment for queer students, this grade twelve student surveyed a number of factors:

The vast majority of students, mainly the people who would give into homophobia, would be those who only value the opinions of their peers. A lot of people are brainwashed very early by their par-
ents, also. Another factor is religion, specifically Muslim students. They’re taught very early on that homosexuality is wrong. If they show any signs of it they will be ostracized from their family and it’s scary. I have a friend who is openly bisexual and Muslim and it’s a big deal.

Even in schools with excellent policies in place, committed teachers to fight alongside these students, an educational component is also required. Tim McCaskell, a former equity officer of the Toronto District School Board, enumerated the problem of the interaction of formal policies and other competing normative regimes: “You’ve got a system that basically reproduces a social order and it’s a racist, homophobic, classist social order. And in order to be a teacher and to be a principal, basically you have to buy into those values.” Part of the solution is simply courage:

Unless you’ve got active parent communities and community pressure on that system constantly leaning on them, unless you’ve got trustees that hold powers of hiring and firing that can make the difference in people’s careers that are accountable to those communities, and unless you have people—students, teachers—in the system that are willing to buck it and cause trouble, then, no, things will not change.

Another component, according to McCaskell, is the need for education to fight the resulting impeding effects both individually and systemically:

When you’re talking about a system of oppression, you’ve got to think of it as kind of a—I think of it as kind of an iceberg. So here, you’ve got individual actions and there’s like the name-calling, the bullying, the beating up stuff. Here are the dominant ideas. Queers are second rate, queers are unnatural, all that kind of stuff. And here’s the systemic stuff—what policies are in place, what curriculum is in place, all that kind of stuff. These things are all interrelated.

Regardless of what type of category of school a student attends, homophobic bullying occurs. However, harassment of sexual minority students does not fall into two types of violence (physical and verbal harassment) alone. In the opinions of the students and teachers inter-
viewed, harassment also includes what I would call, "attitudinal." Attitudinal violence includes dirty looks, refusing to acknowledge others, stares. Most students felt this was particularly used by girls, but agreed that both boys and girls would employ it, particularly in classrooms with teachers present. Tony characterized the force of "attitudinal" oppression in terms of social power held by some students:

There were certain areas of the school and certain people that I instinctively avoided, because they were very dominating, even by how they looked at you. They weren't violent or overly aggressive in how they treated queers, but it was very definitely heterosexual. And they let you know. I think it was more of a situation in which they had social power. They had a certain prestige within the school and that comes about through, among other things, normative gender and sexual presentation. They exuded their sexuality. It was a very dominant kind of sexuality. I think being homophobic and sexist was part and parcel of it. And it goes on without most of them consciously thinking about it.

Within this type of environment in which students face a variety of forms of homophobic bullying—even in schools which are actively seeking to redress the situation—I was struck by the extent to which students, particularly, had considered what was necessary to combat such harassment and amazed at their courage and conviction. These included students, like Gabriel Picard in Thunder Bay, who would stand in front of their student bodies at assemblies to announce that they were queer and deserving of respect. Picard is one of only two students to pursue a human rights claim against his school and school board for failing to provide a safe environment in which to go to school every day. (Azmi Jubran in North Vancouver is the other.) Gabe told me about a conversation with his vice-principal trying to explain to her why he had filed his claim and what he wanted to achieve:

And she's like, "Well, what do you want to do, Gabe? We can't change the way it is. This is it," she told me. These were her exact words: "Gabe, we can't change the culture." Then I told her that if she couldn't change the culture that she was a failure as an educator. And I said, "What's the point in your becoming a teacher, then, if you can't change the culture?" I told her, "That's what teaching is all about—is change." And then I told her, "She failed as an educator because she believed she couldn't change things." And the
only thing she said back to me was, “Why don’t you change high schools?” And I told her, no. I was staying. And so that’s why I filed my complaint, to change the school, to change the culture. If they wouldn’t do it, I would. And I wasn’t going to fail the way they did.

Gabriel Picard refused to believe that there was a limit to what the law could do or where it could reach. Each student I asked agreed with that optimism. No matter how horrendous the treatment (and this included one boy who was set on fire in a classroom), not one student I interviewed felt that the battle to educate was hopeless; rather, the battle to educate was just the point.

However, what I found in my interviews with teachers and students was that incidents involving LGBTQ youth were often ignored or were dealt with as isolated “incidents.” When students and, in some cases, teachers argued for implementation of policies already in place, or for administrative leadership to deal with a larger hostile culture for queer youth, the pleas were most likely ignored. In most cases, where really amazing programs and work were being carried out in schools, it was as the result of the initiatives of individual teachers undertaking this responsibility. These students, as well as teachers and administrators, voiced the need for a broad approach that included proactive policies, inclusive of curricula, and gay/straight alliances to address all three types of bullying or violence. Whether or not there is role for formal law in reaching into the realm of attitudinal violence is suspect; however, they agreed that an educational, as opposed to a punitive approach, would serve this end.

Tim McCaskell addressed the importance of education:

If somebody calls somebody else a fag, they get hauled in. They get disciplined. But think of this as like an iceberg and this is the part that’s above water. If that’s the piece that’s in place, you’re like pushing down on this iceberg. It just pops back up. You’re not really changing stuff. So there’s got to be an educational component, continuing educational component, that deals with those common ideas and confronts the stuff and there’s got to be a political component that deals with the systemic stuff.

Arlene, a committed teacher of 20 years, discussed the importance of using the law to cast the kind of wider net described by Tim:
Having policies around harassment and bullying is certainly not enough. You’ve got to have regular educational work to dismantle and constantly challenge the kinds of stereotypes the kids will be learning from the rest of their environment and you’ve got to have all this systemic stuff in place, not only in terms of harassment, but in terms of differences being promoted. Are the teachers able to be out? Are festivals and queer artists celebrated? Are the positive space posters up? Do teachers know how to deal with homophobic slurs in an educational way when it occurs in their class or is it all about punishment? Is this an environment where people can be out? The educational response has to be there, as well, to combat all the other voices and influences telling the students how to be normal

CONCLUSION

Successful policies to blunt the problem of bullying of LGBT students in Canadian schools remain elusive. Notwithstanding that some Canadian schools have instituted equity/anti-bullying policies, most notably the Toronto District School Board, and, in some cases, are subject to provincial safe school legislation, bullying of these students continues. The bullying of queer youth requires solutions which take into account the unique position of this group.

These students, often by their very presence, challenge dominant gender and/or sexuality boundaries—not only for other students, but for teachers and administrators. I have presented some of my findings regarding the consequences of policies aimed at queer inclusivity when complicated by other normative orders at work in the educational context. In the end, the most important contribution to new policies, those aimed at education, will come from the strength of the voices of the students themselves, buttressed by the teachers who support them and their efforts.

My focus on documenting day-to-day experiences as one way of measuring the impact of law, and my recognition that law is one of multiple normative orders that shape behavior and attitudes, is something that can be usefully brought to bear on the multiple forces at work in Tim’s “iceberg.” By looking at discrimination, harassment, violence, and the bullying of vulnerable queer populations, we can develop educational policies that contemplate more than punishment for individual incidents of bullying.

Strategies to promote the security and protect the rights of vulnerable populations requires a sensitivity to the realities “on the ground” and an
ability to gain trust and establish communication with members of those vulnerable populations. This can be done only by using the law, not to combat individual, isolated incidents of bullying and harassment, but by regarding the law as an instrument of cultural change.

Most legal scholarship focuses on law in the books, and presumes that laws normally have their intended impact, or that law reform moves us towards solutions in a relatively linear cause/effect kind of way. My findings suggest that laws on the books may not be the most important determinant of students’ experiences, and that effects need to be measured rather than assumed. This methodology is an important socio-legal corrective to any overly positivist assumptions in the educational context.

Formal law, policies, and codes of behavior are a necessary first step. Nonetheless, what schools must do to ensure the safety of queer students is to educate and to re-educate the actors in the setting. The curriculum must include courses that study gender and sexuality in order to implicate the heterosexual students. Otherwise, heterosexual students (and teachers) receive information about queer students and react to the response of the law to the harassment of queer students from their distanced, normative positions.

A curriculum that fails to address these issues allows heterosexual students to remain un-implicated in the very cultural practices and processes that lead to the harassment of queer students, free of responsibility, so long as the only culpability for harassment of queers is directed at the landing the blow or hurling the insult. As long as the victimizer alone is permitted to bear responsibility and not the larger culture that has produced him or her, queers will never be safe.

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