

Cyber-Dilemmas: Gendered Hierarchies, New Technologies and Cyber-Safety in Schools

Shaheen Shariff, McGill University, conducts research in the legal considerations that impact educational policy and practice and currently has two projects funded by Social Sciences and Humanities Research Council: 1) to study school policy and legal boundaries involving cyber-bullying and Internet harassment; 2) to study the impact of Quebec's intercultural policies on ethnic students.

Rachel Gouin, McGill University, is a writer, activist and currently a PhD candidate whose dissertation examines young women's informal learning as they engage in social activism.

Abstract

This paper addresses gender issues relating to cyber-bullying among adolescents which is reflective of adult Internet use. It highlights legal considerations to address the policy vacuum on this emerging form of gendered violence.

Résumé

Cet article se penche sur les questions reliées à la cyberintimidation chez les adolescents qui reflète l'usage de l'internet chez les adultes. Ceci met en relief les considérations légales pour adresser le vide des politiques sur cette forme de violence qui surgit basée sur le sexe.

Introduction

In the nineties, the Internet was touted as a space that would allow interaction free of prejudice because gender, race and ability were not visible. Few would now argue that cyber-space is free from discrimination or abuse. Consider cyber-bullying for example. This insidious form of covert, electronic bullying among adolescents is the most problematic form of emerging social cruelty in schools, resulting in enormous policy dilemmas for schools.

This paper explores forms of violence that are perpetuated online, demystifying the "real vs. virtual" dichotomy. We specifically address violence that girls may experience (and engage in) during social interactions in virtual space, and discuss the repercussions of this violence in the physical school setting. Drawing on specific cases, we contend that educational policy-makers, school administrators and teachers ought to play a significantly more active role in fostering inclusive school environments, by critically assessing what they model to young people in physical school settings and in virtual space. Unfortunately, community standards for acceptable social interactions among adults in cyber-space appear to be less rigorous than those accepted face to face (Wallace 1999). Our paper highlights the need to identify the boundaries of student privacy, freedom of expression, school supervision and legal responsibility as educators strive to respond to new technologies. In the face of unprecedented and emerging educational challenges, educators need guidance to address, accommodate, and negotiate students' social realities and education in cyber-space.

Emerging litigation suggests that parents of cyber-bullied victims are increasingly willing to sue schools for failing to protect their children from tortuous school-mates. Our objective is to develop guidelines for schools on educational and legally defensible approaches to addressing cyber-bullying. First, we identify forms and conditions of cyber-bullying. We then address the hierarchies of

power and institutional responses to cyber-bullying (particularly as they relate to gender discrimination on the Internet). We also consider emerging and established law to suggest the most applicable legal avenues to inform educators' legal obligations and resulting policy approaches.

Forms and Conditions of Cyber-Bullying

Cyber-bullying takes many forms, and adolescent behaviour is influenced by a range of environmental and biological influences (Salmivalli et al. 1996; Shariff 2003). However, research discloses gendered and sexual harassment as prevalent forms of cyber-bullying among adolescents and adults. To understand these forms of harassment, it is important to provide background on general conditions of bullying (physical or virtual).

CONDITIONS OF BULLYING

Several conditions are present when bullying occurs in schools (during physical, verbal or virtual social interactions among school-mates). These conditions distinguish bullying from friendly teasing and horseplay and establish a power imbalance between perpetrator(s) and victims(s). First, bullying is always unwanted, deliberate, persistent and relentless. Victim blame appears to justify social exclusion from the peer group (Artz et al. 2000; Katch 2001). Victims might be excluded for looking different; for their sexual orientation, or simply for appearing to be gay (Jubran 2002); for their clothes, accent or appearance; for being intelligent or gifted and talented; for having special needs or disabilities (Glover et al. 1998).

To complicate the problem, popular adolescent discourse often includes sexual insults as terms of endearment among friends. Students might jokingly call a friend "homo" or "ho." This makes it difficult for teachers to identify the difference between banter and serious harassment. Consequently, the saying "Sticks and stones may break my bones but words will never hurt me" appears to be tacitly condoned by teachers (Shariff 2004). Glover et al. (1998) for example, found that teachers respond to physical bullying more frequently than verbal (although 90% of children they interviewed experienced verbal bullying). Physical injuries are tangible and more easily substantiated by victims. Moreover, they are more likely to result in school liability and litigation

(Shariff 2004). Hence verbal bullying in any form appears to receive less attention in schools than physical bullying. Lack of attention to adolescent conversation is dangerous, because this is when they learn to negotiate social relationships and struggle with insecurities, self-consciousness, independence and power (Boyd 2000). The Internet provides a perfect battle ground for adolescent power relationships to become established.

COVERT AND INSIDIOUS

Cyber-bullying consists of covert, psychological bullying, conveyed through electronic mediums such as cell-phones, web-logs and web-sites, on-line chat rooms, "MUD" rooms (multi-user domains where individuals take on different characters) and Xangas (on-line personal profiles where some adolescents create lists of people they dislike). It is verbal (over the telephone or cell phone), or written (flaming, threats, racial, sexual or homophobic harassment) using the various mediums available.

VIRTUAL IDENTITIES

Disturbingly, most cyber-bullying is anonymous because perpetrators are shielded by screen names. Preliminary research discloses that 74% of girls aged 12-18 spend more time on chat rooms or instant messaging than doing homework; one in every seventeen children is threatened on the Internet; and, one in four youth aged 11-19 is threatened via computer or cell phone (Cyber-libel Website 2004; Leishman 2002; Mitchell 2004). A recent survey of 3,700 middle schoolers disclosed that 18% experienced cyber-bullying (Chu 2005). A similar Canadian study of 177 middle school students in Calgary, Alberta (Li 2005), revealed that 23% of the respondents were bullied by email, 35% in chat rooms, 41% by cell phone text messaging, 32% by known school-mates, 11% by people outside their school, 16% by multiple sources including school-mates. Not surprisingly, 41% did not know the identity of their perpetrators.

Although cyber-bullying begins anonymously in the virtual environment, it impacts learning in the physical school environment. Fear of unknown perpetrators among classmates and bullying that continues at school can be psychologically devastating for victims. It is socially detrimental to all students (victims, bystanders and perpetrators) detracting them

from schoolwork (DiGuilio 2001; Olweus 2001). It creates unwelcome physical school environments where equal opportunities to learn are greatly reduced (Shariff 2003).

AN INFINITE AUDIENCE

Research on bullying finds that 30% of by-standers support perpetrators instead of victims (Salmivalli et al. 1996). The longer it persists, the more by-standers join in the abuse, increasing the power imbalance between victim and perpetrators. Isolation renders victims vulnerable to continued abuse, and the cycle repeats itself. What might begin in the physical school environment as friendly banter can quickly turn into verbal bullying that continues in cyber-space as covert psychological bullying. The difference in cyber-space is that hundreds of perpetrators can get involved in the abuse, and class-mates who may not engage in the bullying at school can hide behind technology to inflict the most serious abuse. Power imbalances between victims and perpetrators are intensified by the extent of the audience available to aggressors.

Racist, sexist or homophobic statements and compromising sexual photographs (emailed in confidence to friends), can be altered and sent to unlimited audiences once relationships sour (Harmon 2004). Cyber-space facilitates relentless bullying by increasing numbers of peers. Take for example, the case of 13 year-old Taylor Hern who was added to a "List of Hos" found on a peer's Xanga. The perpetrator (who went by the screen name Immsgirlsgot2hell) had left Taylor a message suggesting: "go to my Xanga, bitch" (Chu 2005, 42). Cyber-space also provides the venue for other lists, including death lists. As Chu (2005) explains: "Cyber-bullying can mean anything from posting pejorative items like the List of Hos to spreading rumours by e-mail to harassing by instant messaging. And incidents of online bullying are like roaches: for every one that's reported, many more go unrecorded (42)."

Gendered Violence in Cyber-space

It has been argued that children who engage in any form of bullying are victims. They are influenced by biological and environmental forces, including intersecting and interlocking systemic barriers

of oppression based on race, gender, sexual orientation, (dis)abilities, cultural hegemony, androcentrism and Eurocentrism that continue to pervade many institutions including schools and courts (Razack 1999; Shariff 2003). It appears however, that girls and women emerge as the primary targets in cyber-space. Given that preliminary research on cyber-bullying discloses a significant amount of sexual harassment and gender differences in the way Internet harassment is engaged in, we outline and define manifestations of online violence. We draw on examples and statistics impacting young women and school environments. Later, we highlight initial court responses to legal claims of sexual harassment in cyber-space to illustrate the judicial system's reluctance to open the floodgates to litigation.

Numerous scholars have written about online gender harassment (Finn 2004; Herring 1999), including unwanted sexual coercion (Barak 2005), virtual rape (Dibbell 1993; MacKinnon 2001), cyber-stalking (Adam 2001; 2002), cyber-bullying (Shariff 2004; Ybarra & Mitchell 2004a, 2004b) and general cyber-violence (Herring 2002). The studies discussed below illuminate ways in which gender-based cyber-bullying or violence differs from and is linked to what occurs in physical (non-virtual) space.

CYBER-VICTIMS

Barak (2005) defines three categories of sexual harassment: 1) gender harassment; 2) unwanted sexual attention; and 3) sexual coercion. These break down into verbal sexual harassment, which includes offensive sexual messages; gender humiliating comments; offensive nicknames; and online identities (such as wetpussy, xtargetool). Active graphic gender harassment includes unwanted erotic and pornographic content through mail or online postings; and 4) passive graphic gender harassment such as pornography on pop-up windows and web-sites. Barak also discusses unwanted sexual attention - uninvited behaviors that communicate sexual desires or intentions. Finally, online sexual coercion that pressures victims into sexual co-operation is also considered on-line violence. Although the use of physical force is not possible on-line, victims often perceive on-line threats as no different from a face to face threat. This is illustrated by the telephone threat that caused Canadian teenager Dawn Marie Wesley to

commit suicide. The words "You're f...g dead!" by a classmate caused her to believe real harm would come to her. Her perpetrator was convicted of criminal harassment because the court observed that perceived harm by the victim amounts to the same thing as actual harm (Shariff 2004).

Herring (2002) agrees that online behavior leading to assault against the physical, psychological or emotional well-being of an individual or group in effect constitutes a form of violence. She distinguishes four types of cyber-violence: 1) online contact leading to off-line abuse (misrepresentation leading to fraud, theft, unwanted sexual contact); 2) cyber-stalking, which comprises online monitoring or tracking of users' actions with criminal intent; 3) online harassment, which consists of unwanted, repeated and deliberate threats, abuses and alarms; and 4) degrading on-line representations of women through words or images that invite disrespect or put-downs.

Studies disclose that teenage girls are more often at the receiving end of cyber-violence. According to Herring (2002), 25% of Internet users aged 10-17 were exposed to unwanted pornographic images in the past year; 8% of the images involved violence, in addition to sex and nudity. Quing Li's Alberta study of middle school children (Li 2005) disclosed that boys more frequently victimize girls. Furthermore, Barak (2005) cites a survey of American teenagers in which 19% of girls had received online sexual solicitations in the preceding year. Cyber-violence studies disclose that most online perpetrators are men and their victims most often women (Adam 2001). He reports that one out of three female children reported being harassed on-line in 2001. Although there is sufficient evidence in the research to suggest that homophobia directed at male victims is prevalent on the Internet (Harmon 2004; Leishman 2002), we cannot ignore the larger gender pattern associated with violence against females that perpetuates societal gender inequalities (Herring 2002).

FEMALE PERPETRATORS

While girls are generally targets of cyber-violence, adolescent girls are increasingly surfacing as active instigators of cyber-bullying. A recent study of 3,700 adolescents (Kowalski, as cited in Chu 2005) found that 17% percent of the girls surveyed confessed to on-line bullying compared to 10% of the

boys. Given that girls aged 12 to 18 spend at least 74% of their time on chat rooms or instant messaging (Shariff and Gouin in press), these results are not surprising.

One plausible explanation might be that girls, who may be more submissive in face-to-face communications, may not feel so constrained by online communications. Ybarra and Mitchell (2004a) found that youth who are victims of bullies in offline environments are significantly more likely to harass others in online environments (51%). This issue is further complicated by caregiver-child relationships, delinquency, psychosocial challenges, and Internet use. Similarly, Wolack, Mitchell and Finkelhor (2003) found that children who had high levels of conflict with parents and those who were highly troubled (with higher levels of depression and victimization or troubling life events), were more likely to engage in close online relationships, increasing their vulnerability to online exploitation. They observe that adolescents who are relying on online relationships to fill a void in their lives may find that such relationships complicate their lives.

Hierarchies of Power and Institutional Responsibilities HIERARCHIES OF POWER

We have explained earlier that bullying in any form involves power. Gender and race are not only matters of representation and performance - they are intimately linked to power structures in society. Patriarchy and White supremacy maintain a hierarchy that places certain people in power and oppresses others. One need only look at who profits from the Internet, who participates and who puts computer pieces together to expose this hierarchy of power (Apple 1990 & 2000; Gramsci 1995).

The Internet is a textual space and it makes sense to use textual approaches to analysis. We need to keep in mind the structures behind the on-line texts which perpetuate violence against women and girls. Gender in cyber-space is not virtual. It is evident in the choices people make about which gender they "choose" online. Curtis (1997), the creator of LambdaMOO, a popular multi-user domain, observes that the majority of male players present themselves as male characters or choose a female gender out of curiosity, to stand out, deceive others, or to entice men into sex talks. Real power is exerted in the

virtual world in multiple ways. It is expressed in various electronic mediums through controlling topics available for discussion, posting inflammatory messages, and flaming. MUD wizards, often men, have more power over controls, commands, toading (transforming a player into a toad, the equivalent of a death sentence) and kicking (booting a player out of a room or out of the MUD, forcing the player to sign in again). Herring (1999) comments that "The Internet itself is organized hierarchically, with certain individual system operators, Usenet administrators, IRC administrators, MUD wizards, etc. empowered to make policy decisions that affect thousands of users. The people who occupy these administrative positions are also overwhelmingly middle-class, white, English-speaking males" (163).

Herring (1999), who conducted a study of two extended Internet interactions - an Internet relay chat and an asynchronous discussion list - demonstrates how power is used to limit girls' and women's participation by presenting them with limited, undesirable choices: conform or be kicked out and vilified. As Herring (1999) explains:

Thus, a context for gender disparity on the Internet is present in preexisting social and historical conditions that accord greater privilege and power to males. The playing field is not level, even when it might superficially appear that every user has an equal opportunity to participate in any given interaction. The larger context helps to explain the female-discriminatory outcomes of the specific interactions analyzed here. Since women do not control the resources necessary to insure equal outcomes, it is hardly surprising that such outcomes are not achieved, despite the efforts of outspoken and persistent female participants. (163)

The virtual world is eerily similar to the real world, forcing us to reconsider such a dichotomy. This division is further challenged when we consider the violence that occurs in cyber-space and its very real consequences. Research suggests that new technologies build on, rather than reinvent patriarchal society. This does not exclude the possibility of resistance. In one example, a grade 5 girl responded confidently to

flaming that occurred on a newsgroup her teacher had set up for the class. She posted a polite request that people respond politely to posts. The flaming stopped (Evard 1996). The teacher's presence on the newsgroup may have contributed to reducing an adversarial atmosphere, which often causes flaming to get out of hand. A polite response may in some cases (not all), work to reduce the impact and take the wind out of the perpetrators' sails. This takes us to the issue of how schools as educational institutions can contribute to the reduction of cyber-violence and bullying.

INSTITUTIONAL RESPONSIBILITIES

Research suggests that schools perpetuate hierarchies of power and tacitly condone cyber-bullying by refusing to address it (Dei 1997; Giroux 2003; Larson 1997; Razack 1999). While its nebulous nature and ability to spread like wildfire are indeed challenging, school responses to reports of cyber-bullying do not differ significantly from reported reactions to general forms of bullying (Harmon 2004; Shariff 2004). Over the last decade, schools have grappled with solutions for reducing bullying in the physical school setting. Shariff's (2003) doctoral review of emerging litigation on bullying, disclosed common patterns in school responses to victim complaints. Plaintiffs explained that when approached for support, school administrators and teachers put up a "wall of defence" (Shariff 2004). According to some parents surveyed, school administrators allegedly: a) assumed that the victims (plaintiffs) invited the abuse; b) believed parents exaggerated the problem; and c) assumed that written anti-bullying policies absolved them from doing more to protect victims. Emerging litigation against schools suggests that parents of victims are increasingly seeking compensation and protection from courts. And, while parents unquestionably have a supervisory and educational role to play, few researchers have investigated the role that can legitimately be expected of schools. Schools are faced with difficult policy and programming issues. They must balance legal constraints such as equality and freedom of expression through innovative, educational responses to address bullying.

We believe the wall of defence by some school officials stems from a fear of litigation and lack of knowledge about the complexities of bullying -

particularly cyber-bullying. That fear is driven by a lack of clarity about the legal boundaries of their responsibilities to students. These boundaries are increasingly blurred as technology and diversity change the landscape of North American schools. Shariff's earlier research suggests that schools have too much information on how to handle bullying, but insufficient knowledge about its complexities (LaRocque & Shariff 2001). Larson (1997) observes that when school administrators are confronted with unprecedented problems, they ignore the root causes and redefine the problem to fit traditional policy approaches. When this does not work, they find it easier to blame victims for inviting the problem; or worse, do nothing in the hopes that the problem will simply go away.

To date, the academic study of bullying in general has focused on developmental psychology and the study of children's behaviour as bullies or victims (Peplar 2001; Pepler, Walsh and Levene 2002). This perspective has captured the attention of primary media outlets across Canada, conferences on bullying (National Conference on Bullying "Beyond Rhetoric," Ottawa, Canada 2005); and, important political bodies such as the United Nations holding consultations on violence against children, for example the conference held in Toronto in 2005. While developmental psychology has made important contributions to our understanding of its forms and nature, we observe a significant knowledge gap in the bullying research resulting from inadequate attention to the role of schools in sustaining power relationships.

From birth, children's actions are informed and influenced by a variety of social influences (Garbarino 1999; Pollack 1998; Ross-Epp 1996). They attend institutions in which power pervades every aspect of school life, and where racism, sexism, homophobia, and ableism often continue to marginalize some students more than others (Dei 1997; Razack 1999). Thus, it is important to consider cyber-bullying in the larger social context of adult and media-modeled standards of acceptable behaviour, attitudes and acceptance of differences; corporate interests that capitalize on children's vulnerability; and ever-increasing thresholds for violence (DiGuilio 2001; Johnson et al. 2002).

Consider for example, a new computer game designed by Rockstar entitled "Bully." The focus of the game is to bully classmates. The BBC reports

game-developer Rockstar's response to anti-bullying protesters as nonchalant. The company wants to wait and see whether this game will encourage "real" bullying ([http://news.bbc.co.uk/2/hi/uk_news/education/4135988.stm], August 10, 2005, accessed August 18, 2005). Freedom of expression rights allow adults to capitalize on profitable children's games without properly researching potential effects. The challenge comes in helping children arrive at their own value decisions about the social messages such products carry when they make their choices. While parents undeniably have an obligation to monitor their children's activities on the Internet, the fact that schools use technology to deliver curriculum and assign homework makes it imperative that attention is paid to how their students use it. They need to establish standards and codes of conduct on Internet and cell phone use, and define acceptable boundaries for their students' social relationships in cyber-space. The role of educators in fostering inclusive school environments would benefit from legal and policy guidelines.

Legal Obligations and the Educational Policy Vacuum

To address the policy vacuum and develop guidelines to help schools, we examine the emerging legal stance adopted by the courts towards cyber-harassment. We then draw from established law to demonstrate applicability of existing legal standards as they relate to sexually charged cyber-harassment.

JUDICIAL RELUCTANCE TO OPEN FLOODGATES

Although statutes relating to Internet issues are beginning to materialize, the judicial record for supporting cyber-victims is dismal. Cyber-threats are considered fictional and the aggressors have generally been found innocent of wrongdoing. This is problematic given that women are most often victimized. Consider a number of American cases cited by Wallace (1999).

In United States of America, Plaintiff v. Jake Baker (June 21, 1995, as cited in Wallace 1999), Jake Baker posted a story to the newsgroup alt.sex.stories. His story graphically described the rape and torture of a university classmate. He also communicated (via email to a friend), his plans to actually carry out the rape. Students who read the story were outraged and

charged him with criminal harassment. The district court threw out the claim holding that because there was no possibility of physical rape on the Internet, there could be no claim for harassment. Moreover, the court was reluctant to infringe on Baker's freedom of expression rights. The precedents set by these courts were followed in *The People vs. B.F. Jones* (Wallace 1999). The case involved sexual harassment of a female participant in a MUD group by Jones, a male participant. This is what the court had to say: "It is not the policy of the law to punish those unsuccessful threats which it is not presumed would terrify ordinary persons excessively; and there is so much opportunity for magnifying undefined menaces that probably as much mischief would be caused by letting them be prosecuted as by refraining from it" (quoted in Wallace 1999, 228).

This reluctance by the courts to avoid involvement in the quagmire of cyber-space is not surprising. The courts have typically adopted a hands-off approach in matters that might open up the floodgates to litigation. In the realm of physical violence in schools for example, American courts have set a very high threshold for plaintiffs to bring claims for negligence against schools, in some cases even when students have been shot or knifed (Shariff 2003; 2004; Shariff & Strong-Wilson 2005).

The worrisome aspect regarding the failure of claims for criminal harassment is that pedophiles and predators gain significantly easier access to Internet "Lists of Hos," for example, and capitalize on them. This takes adolescent cyber-bullying into the more dangerous adult realm of pornography. For example, in one case reported by Harmon (2004), photographs of a young girl who masturbated for her boyfriend were dispersed on the Internet once the relationship ended. The boundaries of this type of harassment need clarification. Laws against the distribution of pornography have been in existence for many years. Moreover, once in the hands of sexual predators such photographs could result in life threatening circumstances for teenage victims if they are contacted and lured into a physical relationship.

APPLICABILITY OF ESTABLISHED LAW AND JURISPRUDENCE

Elsewhere Shariff (2003; 2005; manuscript in progress) outlines legal considerations in greater detail. For the purposes of this paper we briefly

present examples of how established law, especially related to the feminist movement in human and civil rights can inform the void in policy guidelines that relate to protection and education of victims in cyber-space.

Canadian Human Rights and American Civil Law

Canadian human rights law and American civil rights law relating to sexual harassment in institutional settings (Title IX) are highly applicable to gendered cyber-bullying. To illustrate, we present two case examples. The first involves a Canadian sexual harassment case involving harassment by a co-worker outside the workplace (*Robichaud v. Canada* (Treasury Board) [1987] 2 S.C.R.).

The Supreme Court of Canada ruled that institutions are responsible for providing safe environments for their employees even if the sexual harassment by a co-worker occurs outside of the workplace. The fact that the victim must face their tormentors in the workplace imposes an obligation on the employer to address the problem effectively. This case is very relevant to cyber-bullying because school officials often maintain they are not responsible for harassment by school-mates that occurs virtually and outside school hours. As the high court confirmed in *Robichaud*, if the victim has to face the perpetrator within the institution, the institution is responsible for correcting the problem no matter where the harassment actually takes place.

In a controversial landmark decision in 1998, the American Supreme Court broke tradition with avoiding the floodgates. *Davis v. Munroe* (1988) involved the persistent sexual harassment of a grade 5 girl, Lashonda Davis, whose parents informed teachers and the school principal numerous times to no avail. Lashonda's health and grades were negatively affected. The court ruled that in failing to protect Lashonda, the school created a "deliberately dangerous environment" preventing "equal opportunities for learning." It can be argued that cyber-bullying creates a similarly dangerous environment for victims in the physical school setting. Fear and distraction from cyber-bullying reduces opportunities for victims to learn.

Perceived Intent: Criminal Harassment in Canada
While the cases of criminal harassment in

cyber-space have not been successful, an example we provided earlier, involving the suicide of Dawn Marie Wesley is relevant (R. v. D.W. and K.P.D. 2002 BCPC 0096). Dawn Marie's perpetrator was convicted with criminal harassment because the "perceived intent to harm" was taken seriously by the victim as actual intent to harm, resulting in suicide. This lower court ruling may have opened the door to future claims, including those involving cyber-bullying, where perceived intent of harm is very real. For example, misogynist comments, including unwanted sexual harassment, were rated as more threatening when made on-line (Biber et al. 2002, cited in Glaser & Kahn 2004). The online discourse medium may intensify perceived harassment, instead of lessening it. This suggests that the "real" school environment becomes very frightening for victims who no doubt share the same class, hallway and schoolyard with their aggressor.

Conclusion and Implications

Our paper draws attention to a range of important issues facing schools with the advance of new technologies. By presenting our preliminary research findings, we have demonstrated that not only is cyber-bullying prevalent among adolescents, it also occurs among adults. Of significant concern is the fact that gendered cyber-harassment is prevalent. Moreover, the research suggests that schools, as educational institutions, are reluctant to carry out their responsibilities to protect and educate students in inclusive electronic discourse. It is imperative that schools understand and work towards creating equal opportunities for students to learn a right that is guaranteed within our Canadian constitution (1982). To this end, school environments must be free of violence and discrimination, virtual and physical.

We have explained that the law is unclear regarding unprecedented issues of harassment in cyber-space; yet, there is existing law that focuses on institutional responsibilities to address harassment. We have explained that sexual harassment jurisprudence clearly supports the argument for institutional responsibility, regardless of whether the harassment takes place within the work or learning environment. Finally, we have observed that the criminal law supports victims when threats are perceived to be real.

Our ongoing research will continue to disclose emerging litigation and multi-disciplinary research relating to cyber-bullying. These findings, together with qualitative research conducted in schools will inform a set of guidelines that is under development to fill the current policy vacuum in schools. Ultimately, we need to address the shifting community standards of acceptable behaviour in cyber-space by adults and young people.

With 79% of youth knowing their victims (Ybarra & Mitchell 2004a), schools are implicated in the harassment, if only as a place where youth socialize. Their implication does not end there. Schools make use of technology and we contend that they also have a responsibility to protect youth who are making use of this technology. If "virtual" realities are difficult to address in schools, then "real" hierarchies of power in the classroom and the school must be addressed to reduce the incidence of cyber-violence. We hope that the guidelines developed from our research will go some way towards reducing cyber-bullying by informing teacher education and professional development of school administrators. The rest is up to the schools. To succeed, they will need to let down their wall of defence, do away with blanket zero-tolerance policies and traditional anti-bullying programs, and meet the challenges of cyber-bullying with open minds, legally defensible policies, and inclusive educational practices.

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