

## DOCTRINAL DISCIPLINING OF QUEER EDUCATORS IN CANADIAN CATHOLIC SCHOOLS

[Tonya D. Callaghan](#), *University of Calgary*

Little is known about the experiences of non-heterosexual educators in Canadian Catholic schools. This article reveals previously unreported data from a qualitative study that compares the treatment of and attitudes towards lesbian, gay, bisexual, transgender, and queer (lgbtq) teachers in publicly-funded Catholic school systems in the Canadian provinces of Alberta and Ontario. The findings paint a disturbing portrait. Of the 6 teacher participants in the study, 4 are no longer teaching in Catholic schools and 3 of those 4 lost their jobs for contravening Catholic doctrine about non-heterosexuality. The experiences of these gender and sexuality diverse teachers are theorized using various critical theories.

Some readers may be familiar with the attention the Canadian news media have been giving to Catholic schools in the province of Ontario over the struggle for gay–straight alliances (GSAs), or support groups for lesbian, gay, bisexual, transgender and queer (lgbtq)<sup>1</sup> students and their allies (Baluja & Hammer, 2011). This struggle can be cast as a clash between church and state, or Catholic canonical law vs. Canadian common law (Callaghan, 2012). For those unfamiliar with Catholic canonical law related to lgbtq people, it can be distilled into the colloquial Christian expression “Love the sinner, hate the sin.” The sin we’re supposed to hate is

---

<sup>1</sup> Researchers who examine sexual and gender diversity in a variety of contexts generally use the acronym LGBTQ (in upper case) because members of this population often use the words that comprise the acronym to describe themselves (Baird, 2007). I transform the acronym into lower case because it is less jarring to read and is less likely to linguistically set up the population as an obvious Other. In North America, the lgbtq population is also referred to as “non-heterosexuals,” “gender and sexual minorities,” or “gender and sexually diverse persons.” These latter terms are often more appropriate for those who have immigrated to North America from parts of the world that do not recognize lgbtq identities.

the wickedness, in Catholic parlance, of “homosexual acts,” which are “acts of grave depravity” that are “intrinsically disordered” and count among the list of “sins gravely contrary to chastity” (the language of the Catholic doctrine cited in Ontario Conference of Catholic Bishops, 2004, p. 53). This irreconcilable concept of it somehow being acceptable to *be* lgbq but not to *do* lgbq underlies curricular and policy decisions regarding gender and sexual diversity in Canadian Catholic schools.

The church camp has been quietly winning for many years (Callaghan, 2007) but the passing of Ontario’s Bill 13, the Accepting Schools Act (2012)—which mandates that all Ontario schools must allow students to establish GSAs—shows the state camp is now gaining ground. This important victory is limited, however, to improving the situation for lgbq *students* in Catholic schools. The same kind of progress has not been made for the health and well-being of lgbq *teachers* in Canadian Catholic schools. In light of the recent spate of lgbq youth suicides throughout North America (Savage, 2010), few would argue against the need to keep schools safe for vulnerable sexual and gender minority youth; however, the same empathy and understanding is not extended to lgbq teachers, whom many believe are free to simply change schools or leave the profession entirely. This is not a viable option for many lgbq teachers.

This article draws from my recent study (Callaghan, 2012) and highlights previously unreported data about the plight of lgbq teachers in Canadian Catholic schools. It offers a general overview of the findings of the study pertaining to queer educators and then focuses on two teachers’ experiences to illustrate the two types of circumstances the teacher participants most often faced. The queer educators’ stories are analyzed through the qualitative mode of inquiry known as narrative analysis (Clandinin & Connelly, 2000) and are contextualized within the larger study’s theoretical framework and methodology. The findings paint a disturbing

portrait, but a critical analysis shows that resistance to religiously-inspired heterosexist oppression is not futile.

### **Theoretical Framework**

A comparative study of the publicly-funded Catholic school systems in the provinces of Alberta and Ontario<sup>2</sup> vis-à-vis sexual minority groups, the larger study that this article is based upon has an emancipatory focus, which is connected not only to critical theory but also to the traditions of critical pedagogy and anti-oppressive research in education (Giroux, 2001). Anti-oppressive educational research exposes how racism, sexism, classism, and other forms of oppression operate in schools, and proposes ways to redress discrimination and domination in school settings (Brown & Strega, 2005). This critical approach emphasizes the potential of human agency to change oppressive structures into productive systems that thrive on diversity and difference.

The central question driving the greater study is “How does power operate in Canadian Catholic schools?” In order to answer this question, the study explores Foucault’s notion of the *micro-physics of power* (1975/1995, p. 139) or the very minute operations of power that can occur from the bottom up or among and between different constituents within a school. The study’s central question is supported by four subset questions and the one that pertains to this article is “How does power produce teachers as subjects?” The larger study is one that is as interested in charting any resistance to doctrinal disciplining as it is with describing disciplinary

---

<sup>2</sup> Ontario and Alberta can be regarded as leaders in Canadian Catholic education because of the larger populations of these two provinces, their bishops who have written prolifically on Catholic school policy regarding sexual minorities, and the long-standing historical connection between Catholicism and early Upper Canada (now known as Ontario). Therefore, Alberta and Ontario were purposefully selected (Patton, 2002) sites for this case study of homophobia in Catholic schools (Creswell, 2007; Stake, 1995).

control itself. The goals of critical, anti-oppressive research also inform the methodology and the methods used to collect data.

### **Methods and Data Sources**

The larger study employs a multi-method qualitative research framework involving 1) semi-structured interviews with 20 participants (7 current and former teachers and 13 former students), which are re-presented as vignettes using narrative analysis; 2) media accounts that illustrate the Catholic schools' homophobic environment; and 3) two key Canadian Catholic policy and curriculum documents. The methods of analysis for this comparative case study (Yin, 2009) are inductive and grounded in the data. This article restricts its discussion to the participant portion of the study by providing an overview of the findings pertaining to the teacher participants and then specifically focusing on two teacher participants who represent the two main kinds of experiences described by the teacher participants in their research interviews.

### **Some Demographic Details about the Participants**

Martin and Meezen (2009) point out that LGBTQ populations are particularly vulnerable to exploitation and harm as a result of their participation in a research study due to their marginalized and devalued position in the greater community. For this reason, I do not offer any identifying details of the participants, such as their names, the names of their schools, or the names of their cities or towns. Of the 20 participants, 10 are from the province of Alberta and 10 are from the province of Ontario. All of the 20 participants who took part in this study have had some experience in a Catholic school in the provinces of Alberta or Ontario, either as a current or former teacher or as a former student. The term *teacher* refers to the 7 participants, who are

faculty members from different Catholic schools throughout the provinces of Alberta and Ontario: 1 teacher assistant, 1 substitute teacher, 4 teachers, and 1 principal. Of the 7 teacher participants, 6 of their narratives appear in the larger study.

### **An Overview of the Study's Findings Pertaining to Queer Educators**

All of the teacher participants identify as lesbian, gay, transgender, or queer, except for 1 female teacher participant who identifies as a “straight ally.” Of the 6 teacher participants whose stories are analyzed using narrative inquiry, 4 are no longer teaching with their original Catholic school board; 3 of these 4 were fired for behaving in ways Catholic school administrators deemed to be contrary to Catholic doctrine vis-à-vis gender and sexual diversity (this involves not just *being* lgbtq but *doing* lgbtq). There is no public record of the firings of these teachers because none of them went to court or the media over the matter. One teacher was harassed about her suspected lesbianism to the point that she chose to quit the profession after she completed her temporary contract. Each participant has been given a Biblical name as a pseudonym. The following summaries are necessarily brief in order to enable a fuller examination of 2 teacher participants in an upcoming section. Each participant's story is available in greater detail in the full study, *Holy Homophobia* (Callaghan, 2012).

Job was fired from his Catholic district in rural Alberta in 2008 because he was transitioning from the female to the male gender. Naarai was fired from her Catholic district in rural Alberta in 2009 because she was attempting to get pregnant so she could raise a child with her female partner. Anna was fired from her Catholic district in southern Alberta in 2004 for taking on the role of “straight ally” to the lgbtq students in her Catholic school and providing a “positive space” for them to meet in her classroom at lunchtime. Naomi was harassed because of

her suspected lesbianism by conservative residents in her northern Ontario town, and by certain colleagues at the elementary school where she had accepted a temporary teaching position. The homophobic harassment was so severe that she barely completed the school year in 2005.

The 2 other teacher participants who were not fired or forced out of their jobs are a male principal and a male teacher who have been teaching with their respective Catholic school districts since the mid-1990s, but are only able to do so by remaining closeted at work and by pretending to be bachelors unlucky in love, despite the fact that both men have long-term male partners with whom they have been living for several years. Mark is a principal at a Catholic elementary school in Alberta who has developed excellent coping skills in avoiding personal questions that might reveal his sexuality and marital status. Luke is a high school English teacher in Ontario who is fearful that the Catholicity clause in his employment contract might be used to fire him if it becomes known that he has been living with his male partner in a common-law arrangement for more than a decade. Like Mark, Luke has developed coping skills to avoid the homophobic indoctrination that pervades his school atmosphere. Unlike Mark, Luke finds covert ways to express his sense of human rights activism in his Catholic school.

### **A Closer Look at Two Teachers via the Narrative Inquiry Method of Analysis**

Qualitative educational researchers have long been concerned with striking the right balance between the three strands of quality criteria known as legitimation, representation, and praxis. These quality criteria are akin to the three pillars of validity, reliability, and generalizability known to the quantitative or “scientific” research tradition. Denzin and Lincoln (1994) identify a “double crisis of representation and legitimation” (p. 10) for qualitative researchers, which is that any representation must be able to claim legitimacy in terms of criteria

that will enable researcher and reader to make connections between the text and the world about which the text is written (Mulholland & Wallace, 2003). Narrative inquiry, also known as narrative analysis, is a form of qualitative research that involves telling stories, often called narrative vignettes. The story form holds promise as a method for qualitative researchers because it is particularly suited as a linguistic form for expressing human lived experience (Ricoeur, 1986/1991). Narrative vignettes are the tools life-narrative researchers use to transform educational practice and contribute to theory building (Chase, 2005; Ellis & Bochner, 1996; Lieblich, Tuval-Mashiach, & Zilber, 1998).

The following section showcases the narrative vignettes of 2 teacher participants: Naarai of Alberta and Luke of Ontario. Details about where these participants live and work are obscured by generalities. The participants' regular habits, such as their usual teaching assignment, volunteer commitments, or leisure activities, are changed so that they are less identifiable and the participants' confidentiality is better maintained. Further analysis of themes and messages that come out of these two narratives immediately follow in the Critical Analysis section.

### *Naarai*

A teacher assistant in Catholic community schools in rural Alberta, Naarai's tasks mainly involve tutoring students individually or in small groups to help them master assignments and to reinforce concepts presented by the classroom teacher. Naarai loves working with young people. It's the adults in the building who cause her trouble.

Naarai's first job was in a Catholic high school in 2007. She found she could be herself around the 15 to 17-year-olds; she understood their humour, laughed easily and often around the

teens, and established an enviable rapport with them. What she didn't realize, though, was that her growing comfort with her work environment meant that she was not on guard for the workplace harassment she was about to encounter.

One of her co-workers started to gather, through conversational details and daily observations, that Naarai is a lesbian who lives with her female partner. During lunch breaks, Naarai's co-worker would expound at length on her disapproval of same-sex marriage and speak in other disparaging ways about homosexuality. Naarai noticed that her co-worker never brought these kinds of topics up around other staff members. Naarai started to get the feeling that her co-worker might somehow blackmail her at work, so she became more guarded about her personal life and called her union for advice. A union representative advised her that, in Canada, people cannot lose their jobs due to their sexual orientation. With this news, Naarai relaxed somewhat. However, when other job opportunities became available within the district, Naarai jumped at the opportunity to switch jobs and take a teacher assistant position at another school.

Not wanting to expend so much energy hiding her life from her new colleagues, Naarai made a conscious decision to be open about her sexuality in her new job. She and her partner were contemplating starting a family and Naarai excitedly shared this journey with some of her co-workers. A bond developed between Naarai and her colleagues and they invited her out to the local pub, a regular Friday after-school gathering for faculty. Not one for normally socializing with co-workers, Naarai reluctantly agreed. When her partner later came to collect her from the pub, various staff members managed to cajole her into visiting with them for a bit. It was not long before the principal of the school began to grill the couple about their plans to start a family. He claimed the Church would not approve of their constructed family, and they should therefore consider adoption.



On the way home, Naarai and her partner fumed about the audacity of this man telling them how to plan their family. In the months that followed that one-time pub visit, Naarai started to see a fertility specialist and had to book an afternoon off work for an appointment. The day before the appointment, her principal called her into his office and asked, “What is the nature of your medical condition?” Naarai told him it was none of his business, other than that it was female in nature. The principal stood over Naarai, crossed his arms, and said, “I know what is going on with you and your medical condition. I warned you that the Church does not approve of this.” Naarai protested that she thought she would be safe, considering that a union representative told her she could not be fired for being a lesbian, the school is publicly funded, and it incorporates Aboriginal teachings into its Catholic ethos. He icily responded, “Well, you are not safe and you assumed wrong.”

Naarai contacted her union again and they arranged an out-of-court cash settlement in exchange for Naarai’s quiet departure from the Catholic system. Nevertheless, this abrupt job loss has devastated Naarai.

### *Luke*

Luke has been teaching English in a Catholic high school in Ontario since the mid-1990s. He is more relaxed now about the conflict between his homosexuality and his workplace than he was in his first few years of teaching. “My first year of teaching,” Luke remembers, “I was completely naïve.” Like many beginning teachers who are lgbtq, Luke assumed there would be no problem with his sexuality at school, even at a Catholic school, because he was able to be out in every other sphere of his life and he thought, “This is Canada, after all, right?” In his first year, Luke volunteered to help out with the school play and on opening night he brought his

partner Anthony. From the moment they entered the school, Luke sensed he was going to have to hide their relationship.

He has not brought Anthony to any school function since, because he is too worried people will realize they are partners and he will be fired for living outside of Catholicity. It's not that he's completely in the closet. He is able to be out to some of his colleagues. His "nightmare scenario" is that one of his teacher friends may let something slip about his gayness when speaking with members of the administration. This is what he calls his "Oh, God. This is the day I'm going to be fired" nightmare. Luke knows this is a very real fear because of the Catholicity clause in teachers' employment contracts requiring them to uphold Catholic doctrine—a clause that has been successfully used in Alberta and Ontario to get rid of gay teachers who live with their partners.

Luke knows he can only control himself, not others. When he had to teach the homophobic human sexuality component of religion class, which condemns homosexuals to a lifetime of celibacy, he decided to call in sick. Likewise, when the school chaplain wanted to engage the whole school in a public Catholic procession to the nearby church for the first of many school Catholic Masses (which involves getting students to carry Catholic banners and walk reverently to the church), Luke also called in sick because he could not square publicly endorsing a Church that reviles him. He feels guilty about this, though, because he sees himself as letting down the LGBTQ students in the school who cannot so easily absent themselves from homophobic curriculum or faithful activities because they do not have the benefit of knowing what is coming up in the schedule.

To make up for this, Luke encourages student influences on curriculum. For example, during a unit about diverse marriage in the course Anthropology, Psychology, and Sociology,

some of his students asked to do a project on same-sex marriage, Luke did not object or give them the usual Catholic rationale as to why it would be offensive in a Catholic school. Instead, he let the students do their presentation in front of the class and he later put their poster about it up on the multi-use classroom wall.

Luke also spars with school administrators over their indoctrinating methods. One of Luke's greatest outlets for expressing his sense of human rights activism was the student Amnesty International club. Bishops informed Catholic schools throughout Ontario that Amnesty International was at odds with the Vatican on the topic of abortion and therefore could no longer operate in Catholic schools. Luke strenuously protested the removal, but to no avail. Similarly, during the 2011 provincial election in Ontario, the school chaplain sent out e-mails to all faculty urging them not to vote for the Green Party because they support abortion. Luke met with the principal to point out the blatant misuse of the chaplain's leadership role within the workplace to try to influence voting but the principal said she disagreed with Luke and saw no problem with the chaplain's e-mail.

Luke is certain that his increasing boldness regarding the injustice he sees around him is making him a more authentic classroom teacher and, for him, that's what counts.

### **A Critical Analysis of the Teachers' Experiences**

In order to help explain the phenomenon of holy homophobia in Canadian Catholic schools, I theorize the teachers' experiences using the following critical theories: Gramsci's (1971) notion of *hegemony*, Althusser's (1970/2008) concept of the *ideological state apparatus*, and Foucault's (1975/1995) theory of *disciplinary surveillance*.

Gramsci theorized that consent is as vital as coercion if ideological hegemony is going to function. Luke believes he must closet or hide his non-heterosexual identity in order to keep his job. He strategically acts out his consent to his own domination by pretending to live within the confines of Catholicity as a normal heterosexual man who just happens to be without a female partner. He experiences a form of doctrinal disciplining in the tremendous amount of emotional and psychological energy he feels obligated to expend in order to pretend to be heterosexual and single. This dissimulation robs this teacher of one of the privileges taken for granted by most heterosexuals in contemporary North American society—sharing information about the source of their romantic love and happiness with others. Gramsci’s writings on hegemony do not necessarily assume individuals undergo complete psychological acceptance of dominant ideologies. Given that Luke has a long-term male partner (thereby disregarding Catholic doctrine that confines homosexuals to a lifetime of chastity and celibacy) and that he chose to participate in a study about homophobia, he clearly has not consented entirely to Catholic heterosexist domination. Gramsci’s theories account for the ideological domination of Catholic doctrine about non-heterosexuality in Catholic schools, but they also allow for acts of resistance to Church-sanctioned homophobia.

Like Gramsci, Althusser posits that repression on its own cannot reproduce the existing social relations of production in any given culture and that ideology plays a vital role in the reproduction of the status quo. According to Althusser’s concept of the ideological state apparatus, the “state” that is operating in the Catholic schools of this study, in relation to sexual minority groups, is the Vatican, and the dominant ideology being circulated is Catholic doctrine. As Althusser (1970/2008, p. 19) explains,

The Ideological State Apparatuses function massively and predominantly *by ideology* [italics in the original], but they also function secondarily by

repression. . . . Thus Schools and Churches use suitable methods of punishment, expulsion, selection, etc., to “discipline” not only their shepherds, but also their flocks.

The Catholic Church’s position on sexual diversity is circulated in Catholic schools primarily by ideology (i.e., via curriculum taught through a Catholic filter) but also secondarily by repressive policy (informed by Catholic doctrine) that directs school administrators to fire lgbtq teachers for behaving in ways deemed contrary to Catholicity. In Althusser’s framework, resistance to ideological domination appears to be impossible.

Examples of Althusser’s ideological state apparatus functioning secondarily by repression can be seen in the stories of the 4 teacher participants in this study who were ousted from their jobs. Each of these teachers experienced the discipline of the repressive arm of Althusser’s ideological state apparatus in the form of the Catholic Church and its doctrine because they were too open about their non-heterosexuality, or about their support for lgbtq students, in their Catholic schools. Space limitations do not permit me to share each of the dismissed teachers’ narrative vignettes, but Naraai’s story is representative of the kinds of repressive tactics experienced by the majority of teacher participants.

Naraai thought she could be open about her lesbianism at her Catholic school and spoke freely with her work colleagues about her happy plans to raise a baby with her female partner. This caught the attention of the principal of the school who monitored her behaviour closely. When Naraai started taking time off of work to see a fertility specialist, the principal reminded her that he had warned her earlier about how the Catholic Church would not approve of her constructed family with her lesbian partner and initiated the process of terminating her employment on these grounds. Here, the principal was operating as a member of the repressive

force of Althusser's ideological state apparatus by crafting school policy that would align more closely with Catholic canonical law than with Canadian common law.

It is hardly a coincidence that, historically, the Catholic Church has explicitly operated as an Althusserian *repressive state apparatus*. As a government/state, it acted and ruled through its religiously sanctioned military campaigns known as the Crusades, and also through its *Inquisitio Haereticae Pravitatis* (inquiry on heretical perversity) known as the Inquisition. The Catholic Church's historical RSA status can still be seen today in the repressive arm of its ideological state apparatus, the Catholic school, which effectively punishes and otherwise disciplines teachers and students who do not conform to Catholic doctrine.

Luke is not only subject to the wiles of Althusser's ISA the Catholic school, but he also experiences a kind of Foucaultian disciplinary surveillance known as the Panopticon. In his book, *Discipline and Punish*, Foucault (1975/1995) draws upon the work of 18th century British utilitarian philosopher Jeremy Bentham (1748–1832) who describes the Panopticon as an architectural device that can be used in institutions such as prisons to observe all the prisoners without the observer being seen. Prisoners never know if they are being observed or not, and therefore must act as though they are always being observed. The power of the Panopticon is its ability to cause those being observed to discipline themselves and to “induce [within them] a state of conscious and permanent visibility that assures the automatic functioning of power” (Foucault, 1975/1995, p. 201). The Panopticon reveals how the repressive force of Catholic doctrine causes teachers in Catholic schools to conform to the disciplinary regime required of them.

This form of disciplining surveillance is not entirely successful, however, as Luke is able to be open about his sexuality with select colleagues at work, and he is also able to express

his commitment to social justice activism through various acts of subversion. Furthermore, Luke is not totally dominated by the doctrinal disciplining of his Catholic school in that he has a live-in, long-term partner, despite the fact that this is decidedly against Catholic doctrine. Through the power of personal will, Luke has managed to not fully internalize the disciplining gaze of the Panopticon. Unlike Althusser, Foucault does not overlook the possibility of resistance; he also theorizes the productive force of power, which can explain how the heteronormativity of the Catholic school unexpectedly invites new acts of resistance.

### **Conclusion**

An analysis of the teachers' experiences through the lens of critical theories reveals that the Vatican is able to assert a dominant and hegemonic power within Catholic schools. In terms of disciplining the sexual conduct of queer educators, the Vatican's power prevails over other governments such as provincial ministries of education and, by extension, the Canadian government in the publicly funded institution of the Canadian Catholic school. The Vatican's power is "panoptic" (Foucault, 1975/1995, p. 201) and operates by means of discipline, surveillance, and self-regulation. Resistance on the part of teacher participants is less pronounced than that of the students in the study. This is largely due to the fact that the majority of the teacher participants were swiftly fired for behaving in ways that are perceived to contravene Catholic doctrine about non-heterosexuality and so had no opportunity to resist the systemic homophobia of their Catholic schools. Overall, the teacher participants in the study experienced greater degrees of doctrinal disciplining regarding non-heterosexuality than the student participants. All of the participants experienced some form of homophobia in their Catholic schools and none described a Catholic school environment that was accepting and welcoming of

sexual and gender diversity. Although the Vatican's power is clearly a dominant force, it is not entirely successful in achieving total domination over sexual minority groups. This is evident in the instances of resistance, particularly among students, that the full study also documents.

This article opened with a description of the struggle for GSAs in the province of Ontario, which was a hard-fought battle initiated by students in Ontario Catholic schools. The struggle was particularly difficult because of the backlash from Ontario Catholic bishops who tried to squash the student movement at every turn. For example, in his letter to all Ontario Catholic school board directors, Bishop Paul-André Durocher, the chair of the Education Commission of the Assembly of Catholic Bishops of Ontario, discouraged the establishment of GSAs in Catholic schools claiming that they “imply a self-identification with sexual orientation that is often premature among high school students” (as cited in Hammer, 2011, p. 1). Catholic bishops, who prefer to refer to non-heterosexuals as “persons with same-sex attraction” also objected to the use of the word “gay” in GSA because they regard it as a problematic, politically-charged, and reductionist term (Ontario Conference of Catholic Bishops, 2004, p. 26). Nevertheless, the students and their supporters persisted and subsequent iterations of Bill 13 now include a notable provision that requires schools to allow students to use the word “gay” in the name of their GSA. The widespread acceptance of Bill 13 shows that Ontarians recognize that the Roman Catholic Church is not the only authority on Catholic education in Ontario.

Some Catholic school administrators are now acknowledging the authority of Canadian law and the impact it can have on the daily operations of Catholic schools. A case in point is Windsor-Essex Catholic District School Board in Southwestern Ontario, which became the first Catholic board in Ontario to allow secondary students to form gay–straight alliances and to name them as such (“Gay–Straight Alliance,” 2012). Commenting on Bill 13's new bullying and



discrimination amendments to Ontario's School Act, Windsor-Essex Superintendent, Mike Seguin, recognized the Roman Catholic Church was not the only authority on Catholic education in Ontario: "Our position is to be fully compliant with the law. We're law-abiding citizens and it's important as adults and as leaders in the school system to show that and to follow the mandate based on the Bill 13 guidelines" (cited in "Gay–Straight Alliance," 2012, p. 1).

More Catholic school administrators ought to follow Superintendent Mike Seguin's lead and recognize the authority of the Canadian Charter of Rights and Freedoms (1982), specifically Section 15—the equality rights provision—that protects against discrimination on the basis of sexual orientation. This Charter protection is also expressed in provincial and territorial human rights codes and in many teachers' codes of professional conduct throughout Canada. Queer educators have a right to pursue their teaching careers in publicly-funded Canadian Catholic schools free from fear of religiously-inspired heterosexist oppression. The time has come for Catholic education leaders and school administrators to respect Canadian law vis-à-vis gender and sexual minorities in publicly-funded Canadian Catholic schools. After all, Canadian Catholic separate schools are publicly-funded and are accordingly operated by civil authorities, which makes them accountable to provincial governments rather than church authorities.

## References

- Accepting Schools Act*. (2012). Royal assent received chapter number S. O. 2012 C. 5. Retrieved from [http://ontla.on.ca/web/bills/bills\\_detail.do?locale=en&BillID=2549](http://ontla.on.ca/web/bills/bills_detail.do?locale=en&BillID=2549)
- Althusser, L. (2008). *On ideology*. London, UK: Verso. (Original work published in 1970)
- Callaghan, T. D. (2007). *That's so gay: Homophobia in Canadian Catholic schools*. Saarbrücken, Ger.: Verlag Dr. Müller.
- Callaghan, T. D. (2012). *Holy homophobia: Doctrinal disciplining of non-heterosexuals in Canadian Catholic schools* (Doctoral dissertation). University of Toronto. Retrieved from <http://hdl.handle.net/1807/32675>
- Baird, V. (2007). *The no-nonsense guide to sexual diversity* (rev. ed.). Toronto: New Internationalist.
- Baluja, T., & Hammer, K. (2011, March 18). Mississauga high school bans gay-straight alliance. *Globe and Mail*, p. A13.
- Brown, L., & Strega, S. (Eds.). (2005). *Research as resistance: Critical, indigenous, and anti-oppressive approaches*. Toronto: Canadian Scholars' Press/Women's Press.
- Canadian Charter of Rights and Freedoms. (1982). Part I of the Constitution Act, 1982, RSC 1985, app. II, no. 44. Retrieved from <http://laws-lois.justice.gc.ca/eng/Const/index.html>
- Chase, S. E. (2005). Narrative inquiry: Multiple lenses, approaches, voices. In K. Denzin & Y. Lincoln (Eds.), *The Sage handbook of qualitative research* (3rd ed., pp. 651–679). Thousand Oaks, CA: Sage.
- Clandinin, D. J., & Connelly, F. M. (2000). *Narrative inquiry: Experience and story in qualitative research*. San Francisco: Jossey-Bass.
- Creswell, J. W. (2007). *Qualitative inquiry and research design: Choosing among five traditions* (2nd ed.). Thousand Oaks, CA: Sage.
- Denzin, N. K., & Lincoln, Y. S. (Eds.). (1994). *Handbook of qualitative research*. Thousand Oaks, CA: Sage.
- Ellis, C., & Bochner, A. (Eds.). (1996). *Composing ethnography: Alternative forms of qualitative writing*. Walnut Creek, CA: AltaMira Press.
- Foucault, M. (1995). *Discipline and punish: The birth of the prison* (A. M. Sheridan Smith, Trans.). New York: Vintage. (Original work published 1975)

- Gay–straight alliance now accepted by Windsor’s Catholic board. (2012, August 14). CBC News. Retrieved from <http://www.cbc.ca/news/canada/windsor/story/2012/08/14/wdr-gay-straight-alliance-catholic-board.html>
- Giroux, H. A. (2001). *Theory and resistance in education: Towards a pedagogy for the opposition*. Westport, CT: Bergin and Garvey.
- Gramsci, A. (1971). *Selections from the prison notebooks*. New York: International.
- Hammer, K. (2011, February 15). Halton Catholic school board policy on gay straight alliances side steps issue. *Globe and Mail*. Retrieved from <http://www.theglobeandmail.com/news/toronto/halton-catholic-school-board-policy-on-gay-straight-alliances-side-steps-issue/article580835/>
- Lieblich, A., Tuval-Mashiach, R., & Zilber, T. (1998). *Narrative research: Reading, analysis, interpretation*. Thousand Oaks, CA: Sage.
- Martin, J. I., & Meezan, W. (2009). Applying ethical standards to research and evaluations involving lesbian, gay, bisexual, and transgender populations. In W. Meezan & J. I. Martin (Eds.), *Handbook of research with lesbian, gay, bisexual, and transgender populations* (pp. 19–39). New York: Routledge.
- Mulholland, J., & Wallace, J. (2003). Strength, sharing and service: Restorying and the legitimation of research texts. *British Educational Research Journal*, 29(1), 5–23.
- Ontario Conference of Catholic Bishops. (2004, August 3). *Pastoral guidelines to assist students of same-sex orientation*. Toronto: Author.
- Patton, M. Q. (2002). *Qualitative research and evaluation methods* (3rd ed.). Thousand Oaks, CA: Sage.
- Ricoeur, P. (1991). *From text to action: Essays in hermeneutics, II* (K. Blamey & J. B. Thompson, Trans.). Evanston, IL: Northwestern University Press. (Original work published 1986)
- Savage, D. (2010, September 21). *Welcome to the It Gets Better Project*. Retrieved from <http://www.itgetsbetter.org/blog/entry/welcome-to-the-it-gets-better-project/>
- Stake, R. E. (1995). *The art of case research*. Thousand Oaks, CA: Sage.
- Yin, R. K. (2009). *Case study research: Design and methods* (4th ed.). Thousand Oaks, CA: Sage.