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Supporting minority women and girls: key frames of reference and understanding for educators

Amanda Keddie*

Griffith Institute for Educational Research, Griffith University, Queensland, Australia

Recent high-profile rape cases in Australia involving Muslim and Indigenous minority groups have heightened contention around issues of culture, gender and justice. The article critically examines the culturalising of rape as an ethnic minority issue in the public and legal discourse associated with these cases. This examination problematises the western-driven narratives about minority women that undergird and make possible this culturalising and foregrounds Muslim and Indigenous feminist priorities concerning issues of gender equity and justice. Against this backdrop, the article draws parallels between the inferiorising of ethnic minority culture in dominant legal and public discourse and the reductionism of culture in education discourse. Towards realising the equity mandates of national schooling policy, the article outlines key frames of reference and understanding about culture, gender and justice necessary for enhancing educators' support for ethnic minority women and girls.

Introduction

The contemporary era signifies unprecedented levels of cultural diversity. The geo-political, social and economic processes of globalisation have radically altered the population demographics and cultural fabric of western liberal democracies such as Australia. While shifts in populations and new concentrations of group identity have, in many respects, enabled a generative blend of cultures, they have also generated high levels of social polarisation, discrimination, inequity and fear, particularly in urban centres. In Australia, as in other western contexts, the race, religious and gendered dimensions of this polarisation are becoming increasingly apparent. The Cronulla riots on Sydney's beaches in 2005, where young Anglo- and Lebanese-Australian men engaged in violent battles against each other to defend their 'honour'

*Griffith Institute for Educational Research, Griffith University, 176 Messines Road, Mt Gravatt, Queensland, 4122, Australia. Email: a.keddie@griffith.edu.au

and turf and protect 'their women' were potent examples of this—as were the spate of gang rapes perpetrated by Lebanese-Australian males against Anglo-Australian girls and women in suburban areas near Cronulla before these riots.

Social polarisation along racial, religious and gendered lines has been fortified by the ways in which this violence has been represented in public and legal discourse. The series of gang rape crimes, in particular, were culturalised through the legal system and through the media. Such culturalising was most evident in relation to the Skaf brothers and K brothers 'Muslim' rape trials during the period 2002–06. The brothers' crimes were particularly notorious and incited great public outrage as they were numerous, involved high levels of premeditation and coordination to trap the white Australian teenage female victims, and involved racist and sexist degradation and humiliation towards the victims (Humphrey, 2007). In terms of legal discourse, the culturalising of these crimes occurred especially in relation to the K brothers' trials with the introduction of a 'cultural defence' to explain and, in effect, excuse their behaviour. It was argued here by the K brothers' defence counsel that the boys' Muslim-Pakistani 'cultural conditioning' (particularly in relation to this culture's 'traditional views' about women) was a mitigating factor in the rapes which diminished their responsibility (see Sheehan, 2006). While this proposal was rejected by the court, it was argued that cultural difference reduced the defendant's culpability and thus should be considered in terms of alleviating the severity of his sentence (Sheehan, 2006; Humphrey, 2007).

The culturalisation of crime, and in particular rape, is, of course, not new and not restricted to Australia. There is a long history of western liberal democracies demonising minority immigrant cultures in terms of attributing blame to them for violent crimes. Such culturalising is also not restricted to immigrant groups. In Australia two recent high-profile cases involving the sexual assault of young Aboriginal girls in the Northern Territory have reignited public debate about the culturalisation of rape and sexual abuse as Indigenous issues. These cases have raised national attention to the long-held and prevailing discrimination that Aboriginal women and girls continue to encounter within Australia's legal system on the basis of their Aboriginality and gender. Along the lines of the Muslim rape trials, cultural defence was also put forth in defending the perpetrators—as a mitigating factor to diminish responsibility. Unlike the Muslim cases, however, such a defence has long been used in Australia as an effective means in reducing a defendant's culpability and alleviating the severity of his sentence, and in both of these recent cases was again used successfully to these ends.

Such cases bring to light the disjuncture between seemingly sympathetic liberal tolerance discourses to understanding and addressing cultural difference and endorsing gender and racial dominance and oppression. In this article, these discourses are interrogated. In particular, the article draws attention to, and problematises, the western-driven misogynistic and racist narratives about ethnic minority women that underpin and make possible these discourses; for example, how dominant constructions of Muslim and Indigenous women's gender and sexuality as deviant from the white Anglo 'norm' support a tolerance for abhorrent minority male behaviour. The

ways in which liberal tolerance discourses have amplified gender injustices has generated much contention, particularly amongst feminists who are concerned that efforts to preserve minority group cultural traditions have strengthened patriarchal cultures (see Okin, 1999; Shachar, 2001). Certainly such tolerance discourses are seen as undermining the social status of ethnic minority women and thus as compromising their 'parity of participation'. Fraser (2007, p. 27) defines such parity as a qualitative condition of being on par with others. She argues that this is possible only when 'social arrangements permit all (adult) members of society to interact with one another *as peers*'—as full partners in social interaction.

Within the unprecedented diversity, complexity and social division of liberal democracies like Australia, such issues pose new equity challenges for educators committed to supporting ethnic minority women and girls. The imperative of addressing issues of equity and social justice, while well established in the national schooling agendas of western liberal democracies, has gained increasing salience in recent times (see Department for Education and Skills [DfES], 2007; Ministerial Council on Education, Employment, Training and Youth Affairs [MCEETYA], 2008). As a response to the broader multicultural change context, the most recent national policy in Australia, *Educational Goals for Young Australians*, for example, points to the heightened need to 'nurture an appreciation of and respect for social, cultural and religious diversity and a sense of global citizenship' (MCEETYA, 2008, p. 4). The policy is explicit in its positioning of education as central to building socially cohesive societies through teaching about democracy, equity and justice. It is also explicit in positioning teachers as fundamental to achieving this goal through their capacity to inspire and nurture active, responsible and critically informed citizens.

While strongly supporting these positionings, the article acknowledges that schooling processes continue to reinforce and perpetuate the inequities of the broader social world and that teachers remain ill equipped for addressing issues of diversity and justice (see Hayes *et al.*, 2006). Westernised, classed and gendered versions of autonomy and success continue to be privileged in schools and continue to circumscribe the ways in which minority students are constructed and supported by teachers (see Archer & Francis, 2006; Keddie, 2009). In particular, ethnic minority girls' voices continue to be silenced and their marginal status reinscribed.

The article critically examines the culturalising of crime associated with the recent rape trials to draw attention to the 'grave political consequences' of such culturalising (see Benhabib, 2002) in perpetuating inferiorising narratives about Islam, indigeneity and women. Moving beyond these reductionist narratives towards greater equity for ethnic minority women and girls, the article foregrounds Muslim and Indigenous feminist[1] priorities concerning issues of equity and justice and how such priorities shape their activism against sexual abuse and rape. The article refers to Fraser's parity of participation principle to draw attention to activism that is generative for gender justice—activism that seeks to change the social arrangements that deny minority women a voice, respect and social esteem—and that supports the self-determination and cultural/religious integrity of Muslim and Indigenous women. The article thus

provides an important counterpoint to the enduring marginalising and distortion of minority women's culture in public, legal and educational discourse. This counterpoint is an important backdrop for the article's articulation of some of the requisite understandings necessary for educators to better support ethnic minority women and girls. While imperative in realising progressive equity and schooling mandates, such understandings tend not to be articulated in educational policy.

As a white Anglo-Australian and middle-class feminist, I am acutely aware of my privileged position and the problems this standpoint generates in writing about ethnic minority women. The politics of representation continue to be a matter of concern for minority feminists, who remain highly critical of western feminists' imperialist and paternalistic misrepresentations of their culture. In particular, white-Anglo feminism is criticised as silencing minority women's concerns for religious and racial equity (see Mirza, 1997; Huggins, 1998; Mohanty, 2003). In examining issues of representation and textual authority Bulbeck (1998), drawing on Alcoff, asks: 'should white feminists remain silent concerning the experiences of others, leaving them to tell their [own] truth?' She argues that they should not remain silent because 'refusing to speak for others may refuse a powerful platform from which to support struggles against oppression' (p. 208). Bulbeck notes, however, the imperative of white feminists, as members of the dominant group, critically reflecting on the power relations between themselves and marginalised women. In this article I attempt to adopt this stance in ways that decentre western misrepresentations of ethnic minority women.

The culturalising of crime: western frames inferiorising minority femininities

The culturalising of the recent rape crimes in media and legal discourse as Muslim and Indigenous issues is a potent example of the ways in which ethnic minority cultures in Australia, as elsewhere, tend to be essentialised and inferiorised. Such culturalising illustrates the taken-for-grantedness of western epistemic privilege in mainstream discourse and the inequitable power relations that constitute whiteness as the unmarked deracialised subject against which all 'others' are judged. In terms of media discourse associated with the K brothers and Skaf brothers gang rapes, for example, this culturalising was evident in an emphasis on cultural explanations for the crimes, as if the young men's cultural or religious background was the cause of their heinous behaviour (Ho, 2006, 2007). Prevalent here was an association of the crimes with the boys' ethno-religious identities—their Muslim-Pakistani backgrounds. The effectiveness of culturalising rape as a Muslim issue can be associated with specific dominant framing narratives about Islam and gender relations that portray Muslim men as inherently misogynistic and, by binary inference, Muslim women as submissive and controlled by these men. For many in the west such narratives are potently illustrated in the image of the covered Muslim woman, and the popular notion of the veil as a symbol of female oppression. In these dominant narratives Muslim women's covering of their bodies, their seclusion and their sexual virtue are seen as determined by Muslim men and a misogynistic religion. Through these reductionist lenses,

Muslim women's sexuality is constructed as other and inferior, in opposition to a more enlightened and progressive view of women and sexuality in the west. These narratives were certainly prevalent in the media and public discourse associated with both the Skaf and K brothers' cases; for example, the K brothers' upbringing was seen to condition them towards sexual violence against women (see Sheehan, 2006). These dominant narratives were also endorsed by the K brothers themselves in terms of how the young males constructed their Anglo victims in opposition to Muslim women; as unveiled, they were seen to be sexually promiscuous and thus easy prey.

Further strengthening these dominant framing narratives about Islam and gender relations, media and public discourse associated with these crimes highlighted a 'clash of cultures' between dominant Anglo-Australian values about women and Muslim-Pakistani values. Indeed, the crimes were represented as 'un-Australian', with the mistreatment and disrespect of women positioned as alien and threatening to mainstream Anglo culture. Illustrating this point, Ho (2007) refers to radio talkback commentator Alan Jones's comment that 'Lebanese Muslim gangs' were 'showering their contempt for Australia and our police on these young [Anglo-Australian] girls'. Ho (2007, p. 290) notes how this clash of cultures discourse enables 'an essentialist bifurcation of "egalitarian West" versus "oppressive Islam" [that] obscures the misogynistic elements of mainstream Australian culture'. The ongoing countless sexual attacks perpetrated against women by Anglo-Australian men within Australia's football culture are clear illustrations of this misogyny. It is telling that media discourses around these attacks are silent about the culture, race or ethnicity of these perpetrators.

Similar cultural inferiorising was evident in the public and legal discourses associated with the Indigenous rape cases. Both of these cases involved the violent beating and sexual assault of young Aboriginal girls (14- and 15-year-olds) by Indigenous men in their fifties. In these cases, rape charges were reduced to unlawful intercourse with a minor in consideration of the 'traditional parameters' of the defendants' culture. Weight was given in particular to the 'customary law' of promised marriage, with one defendant eventually being sentenced to 12 months' imprisonment (to be suspended after a period of only one month) (McGlade, 2006). In both cases, the judges did not examine the origin of Aboriginal customary law but instead routinely imposed their understandings of Aboriginal culture (McGlade, 2006).

Referring to such cases, Payne draws attention to the imperialist and racist discourses within the Australian legal system. She describes three types of law that Indigenous women are subject to: 'white man's law, traditional law and bullshit law' (1990, p. 10). Bullshit law refers to the ways in which Aboriginal traditional law continues to be distorted to justify the violence against, and rape of, Indigenous women. As Moreton-Robinson (2000, p. 170) states:

> In court Indigenous women who have been raped are subject to white male lawyers who argue what they claim to be the 'traditional law' line. They also argue that rape by Indigenous men is part of 'murri lovemaking' and not as hurtful or serious for Indigenous women as it is for white women.

The judges' gross leniency on the Indigenous men in these cases, in terms of understanding culture to mitigate the severity of these rapes (as in the Muslim cases), is underpinned by dominant framing narratives about indigeneity, gender relations and sexuality. The key issue here, as Moreton-Robinson (2000), and many others argue (see O'Shane 1976; Huggins, 1994), is how Indigenous women have been, and continue to be, constructed within white racist discourse as other and inferior. Within these discourses Indigenous women's bodies are positioned as sexually deviant, available and expendable. Moreton-Robinson (2000), drawing on hooks (1997), argues in this regard that understandings of Indigenous women's bodies as exotic and primitive and thus naturally predisposed to promiscuity have long undergirded the tolerance of the rape and sexual abuse of Indigenous women by white men. This discourse understands Indigenous women's sexuality in opposition to, and disconnected from, ideologies of white women's sexuality, and is both racist and patriarchal in its exercise and reinforcement of white male privilege.

Similar to the clash of cultures discourse evident in media representations of the 'Muslim' rape cases (where binaries between an oppressive Islam and the egalitarian West obscured the misogynistic elements of mainstream Australian culture), Indigenous male sexuality has also long been constructed in opposition to a more 'civilised' white Anglo masculinity in Australia. Resonating with how Indigenous women have been constructed, Indigenous male sexuality has been understood as primitive in its natural predisposition to sex; along these lines, Indigenous men have been constructed as sexual threats both to white and Aboriginal women (see Ho, 2007).

In these cases cultural diversity is homogenised and pathologised within a white western and patriarchal frame. Turner (1993) refers to this as deploying a reductionist sociology of culture that essentialises culture as the property of an ethnic group or race as a distinctive, bounded and internally unified entity. The political implications of the media and legal discourses culturalising these crimes as associated with religion or race (and thus somehow more excusable or tolerable than if the crimes were committed by the mainstream Anglo-Australian population) are significant in terms of how injustices are understood and pursued (Benhabib, 2002). In these cases the homogenising and pathologising of minority religion and culture have the effect of criminalising the entire Muslim and Indigenous male community. Such criminalising is fallacious; as is well established, there are no simple correlations between crime and cultural background in Australia (see Poynting, 2002) and, while many minority groups have misogynistic views regarding crimes such as rape, majority groups do also. As Hussein (2006) points out, referring to the K brothers case, their crimes were not Muslim crimes, any more than Anita Cobby's murder[2] was a Catholic crime.

In their reinscribing of dominant narratives that inferiorise Muslim and Indigenous females, such culturalising has the effect of strengthening patriarchal discourse and amplifying gender injustice. Under these circumstances, ethnic minority women and girls' parity of participation is severely impeded; the social arrangements that might permit their interaction with others on an equal footing—

as full partners 'on parity'—are clearly undermined (Fraser, 2007). In particular, such circumstances position ethnic minority women as passive and in need of being saved or liberated from their plight, silence their equity priorities and activism, and ignore the positive gender and ethno-religious discourses and spaces within these groups that have long supported justice for women and girls (see Al-Hibri, 1999; Moreton-Robinson, 2000).

Listening to marginalised feminist voices

Minority feminists are highly critical of cultural reductionism within western representations of their equity and justice concerns. In particular, the dominant western frames of white middle-class feminism are seen as exclusionary in their silencing and misappropriation of minority women's issues and in their imperialist and paternalistic approaches to 'supporting' minority women (see Mirza, 1997; Al-Hibri, 1999; Moreton-Robinson, 2000). Al-Hibri (1999), for example, is highly critical of western secular feminists' arguments that are intolerant of important religious and cultural values among Muslim immigrant communities. Resonating with the culturalising of the so-called 'Muslim' gang rapes, such intolerance, she argues, inaccurately positions Islam, rather than cultural interpretations of Islam, as patriarchal, backward and inferior to a more progressive white western culture. It thus fails to recognise the gender justice principles within Islam and how Islam is being embraced in highly positive and agentic ways by minority women.

Indigenous Australian feminists, for example, Moreton-Robinson (2000) and Huggins (1998), have similarly been critical of western distortions of Indigenous culture and their ignoring of Indigenous equity priorities and concerns. In particular, white middle-class western feminism is criticised as complicit in colonial discourses and as silencing Indigenous women who speak out for an anti-racist feminism (see also Huggins, 1994). Many Indigenous feminists argue that it is racism and not sexism that is the primary form of Indigenous oppression. As such, white feminism, in its attempts to control and assimilate Indigenous women, is seen as undermining Indigenous women's political priorities (Moreton-Robinson, 2000).

For educators working to support ethnic minority women and girls in a broader climate of cultural reductionism and liberal tolerance that is undermining their status, these equity concerns bring to light the prevailing importance of listening to feminist voices from marginalised groups (see Mirza, 1997; Bulbeck, 1998; Mohanty, 2003). The following articulates some of the key equity priorities of Muslim and Indigenous feminists and how these priorities shape their activism against violence and sexual abuse. These priorities and activism focus on transforming the social arrangements in Australia that impede minority women and girls' parity of participation, and their capacities to participate with other members of society as full partners in social interaction (Fraser, 2007). Foregrounding such priorities and activism enables a deconstruction of the inferiorising narratives about minority women that undergird and make possible the culturalising of crime as an ethnic minority issue.

Equity priorities of minority women and girls: religion and race

Given the unprecedented diversity and complexity within contexts like Australia, where population shifts and new mobilisations of group identities are constantly recreating cultural and social profiles, an approach that listens and responds to the equity priorities of minority women is far from simple. Minority women, their sense of cultural identity, their views of empowerment and their avenues for agency and activism, of course, respond to and reflect such complexity and change in their 'hybridity' and 'in-betweeness' (see Mookherjee, 2005; also Werbner & Modood, 1997). As Andrews (1997, p. 924) illustrates, for example, in relation to the vast diversity in the geographic location, economic status, lifestyle and age of Indigenous women, 'it is unclear how many Aboriginal women continue to have large parts of their personal lives governed by aspects of traditional law, or whether they live a customary lifestyle'. Supporting and working with minority women and girls thus requires recognition of the complexity and historical locatedness of the race, ethnicity, gender, class and religious relations in Australia that have produced different gender equity priorities for different minority groups. These circumstances have accorded salience to particular differences and identity relations (Bulbeck, 1998).

Muslim feminists' equity priorities and activism.   Listening to the narratives of Muslim women in anglophone contexts such as Australia highlights equity priorities associated with oppressive race/religious relations. While globally there has been a long history of antagonistic relations between the west and Islam, racial hatred directed towards Muslims in terms of demonising them as terrorists and suicide bombers, and their faith as violent and misogynistic, has risen sharply following the 9/11 terrorist attacks in the USA and the subsequent London and Bali bombings. In Australia, research presented to the Human Rights and Equal Opportunities Commission (Poynting & Noble, 2004) reported that religion, and in particular, the wearing of the hijab, was the most common reason cited in terms of the provoking of racist abuse. Veiled Muslim girls and women have thus been the primary targets for racial abuse and attacks in Australia, with most of these perpetrated by white Australian males and many explicitly sexualised; for example, involving indecent exposure, offensive sexual suggestions and threats of sexual assault (see also Poynting, 2002). Many attacks have involved Australian men pulling or ripping girls' and women's headscarves from their heads. Given that misogyny is often culturalised by the west as Islamic, such intolerance from Anglo men is ironic (Poynting & Noble, 2004). While this irony is most likely to be lost on these men, what this intolerance illuminates is how the bodies and sexuality of Muslim women continue to symbolise for many in the west the oppressiveness, backwardness and inferiority of Islam.

For many Muslim women of course, Islam is far from oppressive and backward. Muslim feminists have long argued that it is not Islam that subjugates women; it is patriarchal cultures that have exploited Islam (Karmi, 1996; Wadud, 1999; Al-Hibri, 1999; Barazangi, 2004). Along these lines, Muslim feminists stress the gender justice principles in the Qur'an where men and women are fundamentally equal before God.

Writers such as Afshar (1996) and Mir-Hosseini (1996), for example, foreground how Muslim feminists use arguments based on their faith, rather than arguments based on western notions of equity, to fight against patriarchal cultures. Al-Hibri (1999) draws attention here to the Islamic principles of shura (consultation) and the individual right to ijihad (jurisprudential interpretation of religious text) that offer women agency and empowerment. Given that in Islam, as she points out, there exists no central authority charged with the task of interpreting the religion to the faithful, women's entitlement to engage in shura and ijihad enables them to challenge inequitable treatment through feminist interpretations of religious texts. Such challenging can also draw on Islamic principles that recognise laws as historically located and as such flexible and amenable to revision in order that they reflect and serve the maslaha (public interest) of a particular context. Against this backdrop, new understandings that better reflect women's public interest are made possible (Mir-Hosseini, 1996; Al-Hibri, 1999; Wadud, 1999; Barazangi, 2004; Marcotte, 2006).

Through these lenses many patriarchal mobilisations of Islam have been effectively challenged as cultural distortions that have no basis in Islam. In this way Muslim feminists have provided a counter-narrative to dominant western constructions of Islam as misogynistic and backward. A key part of this counter-narrative centres upon constructions of female sexuality, and, inevitably, Muslim women's defence of the veil. Many Muslim women have long argued the sense of liberation the veil offers them, especially as a form of protection in the public sphere; as a refuge from the 'male gaze'. While it is a symbol of personal religious commitment, the veil is also a political statement against the colonisation and influence of the West (see Bulbeck, 1998). In contrast to the sexual respect seen to be offered to women in Islam, this political statement is undergirded by notions of the West as sexually exploitative of western women (see Karmi, 1996). Through such counter-narratives, arising from feminist readings of religious texts, Muslim women worldwide have challenged patriarchal mobilisations of Islam that have legitimised violence and sexual abuse against them. Violence against women is argued to have no religious legitimacy within Islam and, indeed, is condemned; as is forced sexual relations and understandings of women as sexual objects to be manipulated and used (see Mir-Hosseini, 1996).

Indigenous feminists' equity priorities and activism.   Listening to the narratives of Indigenous women also highlights, albeit from a different historical trajectory, the primacy of equity priorities associated with oppressive race relations. As noted earlier, many Indigenous women have long argued that it is racism—with its historical roots in colonialism—that is primarily responsible for their enduring subjugation and oppression (see O'Shane, 1976; Halliday, 2000). Such racism, as Halliday (2000) notes, has produced immeasurable suffering for Indigenous women through dispossession from their families and communities, lost knowledge of their cultural heritage, their languages and connection to their land, the continuing impact of the forced removal of Indigenous children and their subjection to ongoing physical, sexual and emotional abuse.

Self-determination and cultural integrity are thus key equity priorities for many Indigenous women. In terms of self-determination, Indigenous feminists strongly argue that solutions to problems such as intra-racial rape and sexual abuse in their communities must be initiated and implemented by Indigenous people (see Lucashenko & Best, 1995; Huggins, 1998; Moreton-Robinson, 2000). Many commentators (see Andrews, 1997; Halliday, 2000; Keel, 2004; Kapululangu Aboriginal Women's Association, 2007) note Indigenous women's collective resistance and activism against violence and abuse within their communities through, for example, organising Aboriginal community policing initiatives and justice groups that increase women's access to security, welfare and justice systems; family violence initiatives such as 'women's night patrols' led by recognised authority figures to defuse potentially violent situations; programmes preventing alcohol and drug abuse in communities (e.g. 'sobering-up' facilities) as such abuse is seen as a major factor escalating violence against women and girls; and campaigning for and running Indigenous-led dedicated sexual assault services, particularly safe houses for women and girls (see also Blagg, 2008).

Notwithstanding the importance of these initiatives, many Indigenous feminists understand much of the violence and sexual abuse in their communities as associated with the broader disenfranchising effects of colonisation on their people in terms of a loss of spirituality; replaced by white norms, including white colonisers' glorification of violent masculinity (see Lucashenko & Best, 1995; Bulbeck, 1998). With this in mind, redress for many Indigenous feminists must involve rebuilding connections to and pride in Aboriginality as part of working with violent men to challenge and change their sexist behaviours. An apt example of this in practice is evident in the activities of the Kapululangu Aboriginal Women's Association in remote Western Australia and, in particular, their Women's Law Camp, organised in response to concerns about violence and sexual abuse against women and children in Indigenous communities. The Camp's main focus was to build awareness and respect for Aboriginal Law (i.e. philosophy) and Culture (i.e. customs or practices anchored by that philosophy), through revitalising Women's Law, which is based around 'living the "right way" according to respectful relationships with land, kin and self' (Kapululangu Aboriginal Women's Association, 2007). The Camp centred upon the strength and healing power of Women's Law through cultural learning that focused on developing the younger generation's strong sense of pride in their Aboriginality; a key imperative of this cultural learning involved calling on Indigenous men to honour their traditional supportive responsibilities towards women.

Supporting minority women and girls: key frames of reference and understanding for educators

Foregrounding these equity priorities and areas of activism provides an important backdrop for articulating the frames of reference and understanding about culture, gender and justice necessary for enhancing educators' support for ethnic minority women and girls. The marginalised voices in this article illuminate in particular the

imperative of disrupting reductionist assumptions about gender and culture and, more specifically, decentring the epistemic privilege of western narratives that inferiorise ethnic minority culture. For educators such frames of reference are crucial because they enable a commencement with the particular; a location of the 'other' at the centre. This standpoint draws attention to the imperialism and racism undergirding the culturalising of rape in legal and media discourse that enables a demonising of Muslim and Indigenous males as misogynistic and backward. It also draws attention to the dominant narratives about minority women that make possible this demonising, and indeed, support the tolerance discourses associated with abhorrent minority male behaviour. Within understandings of Muslim and Indigenous women's gender and sexuality as deviant from the white Anglo 'norm', these narratives position ethnic minority women as passive and in need of being saved or liberated from their plight. They also silence Muslim and Indigenous women's equity priorities and activism and ignore the positive gender and ethno-religious discourses and spaces within these groups associated with, for instance, Islam and Aboriginal Law that have long supported justice for women and girls (see Al-Hibri, 1999).

Frames of reference that decentre western epistemic privilege along these lines are particularly important in bringing to light the historical, cultural and situational factors that currently challenge Muslim and Indigenous communities in Australia (see Keel, 2004). Sensitivity to such factors is central to providing a space for ethnic minority women's voices to be heard. As Keel (2004) notes, rape and sexual abuse in minority communities (to a greater extent than in the broader community) remains grossly under-reported. While Indigenous and Muslim women are increasingly building solidarity in raising their voices publicly, and acting against such abuse (see Keel, 2004), it is important to recognise that a key reason for their silence has been their fear of reinforcing imperialist understandings about their culture as inferior especially in relation to issues of gender (see Moreton-Robinson, 2000). As Ho (2007, p. 296) points out:

> Muslim women seeking to critically discuss sexual violence and attitudes toward women find it virtually impossible to do so without fuelling further racism against their community. As one Muslim feminist expressed it, Muslim women become 'trapped' between the media and politicians on one side, and 'misogyny from elements in their own community' on the other.

Sensitivity to such factors is also imperative in identifying culturally appropriate and inclusive support for ethnic minority women. With regard to Indigenous issues, for example, Keel (2004) foregrounds some of the tensions between Indigenous and non-Indigenous approaches to understanding and responding to sexual abuse and violence. Counter to the individualised rights discourses of crime, justice and accountability within non-Indigenous culture, Keel argues that Indigenous solutions tend to favour a communitarian redressing of violence and sexual abuse. Such solutions move away from the traditional adversarial legal model of white Australia in attending to the needs of the community and particularly in 'healing' rather than punishing the perpetrators. The emphasis here is on maintaining family and community relationships, with the victim often central to resolving the conflict (see

Lucashenko & Best, 1995; Keel 2004). Such an emphasis reflects the collective and community ideals of female agency and empowerment that tend to be important within many Indigenous and Muslim cultures and which are often at odds with western notions of female agency and empowerment (which tend to be informed by humanist ideals of individual autonomy, choice and freedom). These differences also bring to light the importance of decentring western-driven assumptions that understand that there is a progressive or enlightened reality for ethnic minority women and girls to discover, that such a reality will be shared and embraced by these women and girls, and that the empowerment process requires varying stages of consciousness-raising (Yuval-Davis, 1994). Yuval-Davis (1994; see also Haw, 1998) argues that empowerment, far from being an 'enlightened' reality that will be discovered and shared by ethnic minority women and girls, is created and recreated according to specific material, historical, and cultural processes and in relation to particular positionings, interests and agendas. Such processes and positionings impact on the ways in which minority women and girls understand, negotiate and take up positions of agency and empowerment (Mohanty, 2003).

The imperative of these frames of reference for supporting minority women and girls is recognised within education contexts (see Haw, 1998; Shain, 2000). However, it remains that cultural reductionism, as with legal and public discourse more broadly, is also highly prevalent in education discourse. Schooling and teacher practice continues to homogenise gender and cultural diversity and to pathologise student difference (see Doherty & Singh, 2007). Resonating with the tenor of the media and legal discourses critiqued throughout this article, educators' gendered, racialised and western-centric understandings continue, for instance, to position Muslim girls as passive victims of their 'backward' culture who need to be liberated (see Haw, 1998); Muslim and Indigenous boys as dangerous and in need of policing and controlling (see Archer, 2003; Martino, 2003); and Indigenous girls along deficit lines as academically and socially less capable than their white female counterparts (see Keddie, forthcoming). As in broader social discourse, discourses within schools and classrooms thus also remain distinct in their inferiorising of minority culture and in their lack of recognition of the spaces of gender agency and empowerment within minority groups (see Shain, 2003). Such inferiorising and lack of recognition are, moreover, characteristic of equity and schooling policy. While equity and justice continue to be key platforms of national schooling policy in Australia and other anglophone contexts, issues associated with equity for girls, and especially minority girls, continue to be sidelined (see Martino & Pallotta-Chiarolli, 2005; Francis & Skelton, 2005). This is perhaps not surprising given the current climate where boys' issues continue to colonise the space of gender equity policy debates.

Moving beyond such exclusionary schooling discourses towards greater equity for minority girls and women represents increasing urgency amid the broader social change context, the continued salience of cultural reductionism in public and legal discourse, and the new equity challenges for educators arising from these conditions. While equity for minority women and girls has been a priority of educational research for some time (see Basit, 1997; Haw, 1998; Shain, 2003; Keddie, 2009), this article

supports a renewed focus on strengthening this priority. Haw's research (1998) in UK schools, remains highly insightful in drawing attention to the significance of the frames of reference highlighted in this article to these ends. Her research 'commences with the particular' of Muslim schoolgirls' femininity and ethnicity and brings to light important understandings for supporting these girls to take up positions of self-determination or empowerment. Such understandings involve both respecting and giving status to the range of cultural/religious discourses shaping their lives, and presenting spaces of empowerment within the possibilities of these discourses. In practice, and consistent with the Muslim feminist priorities articulated earlier, this involves appreciating the cultural and religious significance of particular Islamic customs, and identifying the ways in which Muslim girls are understanding and enacting such customs in empowering ways (see also Basit, 1997). Important here, and similar to the arguments presented earlier about Muslim women's support of the veil, are teachers' disruptions of dominant western narratives of female empowerment that position Islamic customs such as *izzet* (family honour) as necessarily oppressive and disempowering for women and girls. In Haw's research, giving status to the emotional and material reciprocities of such customs, in terms of recognising the strong sense of belonging and acceptance they represented for the girls, was central to supporting spaces of gender equity (see also, Basit, 1997; Shar, 1998).

Conclusion

This article has problematised the reductionism of culture in public, legal and education discourse through a critique of the western-driven narratives about ethnic minority women. Dominant constructions of Muslim and Indigenous women and girls within these narratives, as deviant and 'other' from the white Anglo 'norm', were seen as undermining the social status of minority women in terms their parity of participation (Fraser, 2007). Towards realising the progressive mandates of current national equity and schooling frameworks, the article has highlighted specific frames of reference and understanding about culture, gender and equity necessary to enhance educators' efforts to support ethnic minority women and girls. Of central importance here, as this article has illustrated drawing on the work of minority feminists, is a critical approach that disrupts the epistemic privilege and reductionism of dominant western discourses about ethnic minorities. This disruptive frame of reference enables a commencement with the particular that problematises imperialist and racist discourses and illuminates the ways in which minority women and girls are mobilising spaces of agency and empowerment for themselves.

Such frames of reference are central to supporting greater parity of participation for minority women and girls. While sensitive to the different ways that gender justice might be engaged, they enable a commitment to norms of justice and well-being that will apply to all women which relate to ensuring their personal agency, autonomy, independence, freedom, respect and recognition (Nussbaum, 2000; Fraser, 2007). They are thus also central in beginning to reconcile the enduring contention within

western liberal democracies between preserving minority group cultural traditions, on the one hand, and the protection of women's rights, on the other. As Al-Hibri (1999) argues, in relation to distortions of Islam such as those discussed in this article, cultural reductionism prevents an accurate diagnosis of the problems at hand and delays productive dialogue towards remedying such problems. Moving beyond a reductionist sociology that inferiorises minority culture, these frames of reference deconstruct the myths and misconceptions that distort equity priorities towards more generative, productive and just understandings.

Notes

1. The term 'feminist' is used in this article to mean women working for gender equity—it is acknowledged, however, that minority women may not label themselves 'feminist' because this term is invariably associated with western or Anglo feminism.
2. Anita Cobby was a young Anglo-Australian woman who was abducted, brutally raped, tortured and murdered by a gang of white Anglo men in Blacktown, NSW in 1986.

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