LITERACY : International Scientific Journals of Social, Education, Humanities

E-ISSN: 2829-3649
P-ISSN: 2829-3908

Research Article

A Comparative Study of Contextual Feminism : Saudi Arabian and Iranian Perspectives

Vanessa P.Berry[1*], Petsy Jessy Ismoyo[2], and Novriest Umbu Walangara Nau [3]

1 Universitas Kristen Satya Wacana, Salatiga, Indonesia; Email : echaberry04@gmail.com.
2 Universitas Kristen Satya Wacana, Salatiga, Indonesia, Email : petsy.ismoyo@uksw.edu.
3 Universitas Kristen Satya Wacana, Salatiga, Indonesia, Email : novriest.umbu@uksw.edu
*Author's Correspondence: **Vanessa P.Berry**

Abstract: The Feminism movement was born to represent women's long struggle to achieve gender equality and equal rights between women and men. In the context of the Middle East, feminism exists and develops complexly and contextually, especially in countries with Islamic-based legal systems such as Saudi Arabia and Iran. This research aims to analyze the differences in the top-down approach in Saudi Arabia and the bottom-up approach in Iran in influencing the direction of the feminism movement through the lens of postmodern feminism. This research uses a qualitative approach with a comparative study research type. The data that has been collected shows that Saudi Arabia, through the Saudi Vision 2030 program, seeks to increase the role of women in the economy and the public structurally from above or top down, after previously women lived in an environment with very patriarchal policies. In Iran, women face a repressive government system, but that is where the resistance movement from civil society is created. The perspective of postmodern feminism, especially the thoughts of Luce Irigaray, is used to read how women's bodies in these two countries become a political tool as well as a means of symbolic resistance to a system that is so masculine. This research also observes how the internet, digital media, and transnational feminist networks contribute to shaping resistance and awareness in different ways across both contexts. From this study, it can be concluded that feminism cannot be seen as something universal but is shaped by power relations, culture, ideology, and national policy. The feminist movements in Saudi Arabia and Iran reflect how feminism comes in two contrasting elements: one directed by the state, the other emerging organically from society.

Keywords: Body Politics, Feminism, Iran, Postmodernism, Saudi Arabia

1. Introduction

The Feminism movement was born to represent the long struggle of women to achieve gender equality and equal rights between women and men. This movement began in the 19th century based on social and political changes that occurred in Europe and America. The dominant patriarchal culture at the time placed women as second-class citizens, women did not get the space to vote and even access to education and the economy. At that time, ideally a woman was a wife and mother who was obliged to carry out domestic roles (Taufik, 2022). The Feminism movement is divided into four main waves. The first wave started from the 19th century to the early 20th century and focused on basic legal rights such as women's suffrage. The second wave began in the 1960s to 1980s and raised issues of workplace equality, reproductive rights, and criticism of traditional gender roles. The third wave from the 1990s to the 2000s emphasized intersectionality, inclusivity, and the experiences of women from diverse backgrounds **[1]** and the fourth wave from the 2010s to the present, using digital technology to fight gender-based violence, equal pay, and fair representation in media and society.

Feminism began to develop globally as a movement to fight for gender equality. The movement developed with different nuances in different regions of the world, influenced by local social, cultural and historical contexts. One form of feminism that has developed is contextual feminism. This approach differs from Western liberal feminism, which often emphasizes individualism and secularism. Contextual feminism adjusts its struggle to be in line with prevailing social and religious norms **[2]**. Contextual feminist approaches are commonly found in countries with specific religious or cultural-based traditions and legal

Received: July 02, 2025
Revised: July 16, 2025
Accepted: July 30, 2025
Online Available: August 01, 2025
Curr. Ver.: August 01, 2025

systems such as Saudi Arabia and Iran. Both countries have legal systems and policies based on interpretations of Islamic sharia, but with different approaches to women's rights **[3]**.

Contextualized Feminism in the case of Saudi Arabia and Iran is relevant because the feminist movements in both countries have to adapt to political and cultural systems based on Islamic law. In Saudi Arabia, changes in women's rights have occurred more through state policies that regulate women's roles in society, reflecting the top-down approach envisioned in Saudi Vision 2030 that allows women to gain more rights and freedoms within the framework of Islamic law. Meanwhile, in Iran, the women's movement developed more organically and bottom-up, often in opposition to conservative government policies where women faced stricter restrictions post 1979 Islamic Revolution, so their struggles were mostly carried out through protests and social movements.

This study shows that feminism cannot be viewed as one uniform form of struggle, but must be seen within the political, social and cultural dynamics of each country. Postmodern feminism as an analytical tool helps explain how women in both countries navigate the existing system in fighting for their rights. In Saudi Arabia, women must adapt to state-controlled changes, while in Iran, they must continue to struggle against increasingly strict restrictions **[4]**. Through this comparative study, the author aims to examine more deeply how top-down and bottom-up approaches affect feminism in the context of Saudi Arabia and Iran, the author wants to see the interacting forces of the state and society in shaping the role of women in the 2 regions **[5]**.

2. Literature Review

Theoritical Study

Postmodernist Feminism

Postmodernist feminism from Luce Irigaray's perspective emerged as a critique of second-wave feminism that was too dominantly concerned with the experiences of white women and how to gain equal rights. Postmodernist feminism refuses to see women statically through the same lens, instead it emphasizes the importance of seeing the diversity and complexity of gender. According to Irigaray, this will allow us not to see feminism as a universal problem, but as a contextualized and complex issue that requires a diverse and inclusive approach. Irigaray's main point through Postmodern Feminism is the recognition and appreciation of the diversity of women's identities and experiences **[6]**.

Irigaray also argues that language plays a role in placing women at the bottom, as patriarchal culture is reflected in it. Irigaray talks about the grouping of words that describe masculine and feminine **[7]**. Irigaray highlights differences that should be taken into account. While to the general public, difference is portrayed as something negative or worthless, Irigaray disputes this by arguing that difference is a positive element, that there are two differences between the sexes means there are two perspectives on knowledge and truth.

Postmodern feminism focuses on liberating women from a phallogocentric culture or a worldview defined by patriarchy that freezes women's meaning. And Irigaray argues that since all knowledge about women is shaped from a male perspective, women's views should be shaped on their own terms. But many criticisms have also come for postmodern feminist thinkers, one of which is that they are considered to only critique the dominant discourse and tell us little about what to do **[8]**.

Previous Research

The first journal, Dynamics of Gender Equality in Saudi Arabia: A New Hope in the Era of King Salman (Nevy Rusmarina Dewi, Azza Ihsanul Fikri, Afifah Febriani). This journal only analyzes the development of the discourse on gender equality in Saudi Arabia which has led to policy changes in the era of King Salman. Then the discussion explains that policy changes in Saudi Arabia are influenced by the socio-cultural conditions of Arab women, the debate of scholars on gender equality who put forward the Wassathiya point of view, and the Vision 2030 program by Prince Mohammad bin Salman as a hope for implementing policies that provide greater space for the role of women in the public sphere.

The second journal, Dynamics of Iranian Women's Social Movements (Pre & Post 1979 Revolution)" (Anis Shofiyah) it only explains how the conditions and movements of Iranian women before and after the revolution and how the forms and movements of Iranian women after the revolution. The discussion explains that the conditions and movements of Iranian

women began to appear after the discourse of modernity in Iran, which was made during the Qajar Dynasty and expanded during the Pahlevi Regime.

The third journal under, Reforming Saudi Arabian Women's Rights Through Saudi Vision 2030 in 2017-2019 (Analieza Ilmiatun Mufiedah, Setyasih Harini. S.IP. M.Si., Halifa Haqqi. S.IP. M.Si) only discusses Saudi Vision 2030 as a form of sustainable development from Saudi Arabia, one of which discusses the achievement of gender equality. The journal explains how Saudi Vision 2030 contains policies such as economic modification, political reform, and political reform where the three forms of policy are far more gender-friendly

The last journal, Efforts of the "Woman, Life, Freedom" Movement in Upholding the Protection of Women's Rights in Iran (Aura Cinta Deviana Marah, 2024) only discusses the Iranian revolution in 1979 which became the beginning of various policy changes and a series of new regulations. The journal explains that these policies tend to be patriarchal and oppressive, so that people, especially women, feel injustice. For example, the death of a girl named Mahsa Amini by moral police officers because she was considered not wearing a hijab in accordance with applicable regulations, this caused public anger which culminated in a movement called Woman, Life, Freedom to demand women's rights and equality in Iran.and liberate women **[9]**.

3. Proposed Method

This research uses a Qualitative research approach which is usually used in the world of social sciences and humanities, especially when it comes to what is behind human behavior which is usually difficult to measure with numbers **[10]**. This research is supported by the type of comparative study research using the theory of postmodernism feminism in the process of analyzing the data collected using literature study techniques and document analysis. Literature study, as explained by Zed (2008), is a method of collecting information by examining various literatures such as books, scientific journals, research reports, and academic articles in order to obtain a strong theoretical basis and in-depth understanding of the topic under study. Meanwhile, document analysis was conducted by reviewing and evaluating various official documents, including government policies, regulations, and international organization reports related to feminism in Saudi Arabia and Iran.

4. Results and Discussion

Dynamics of Feminism in Saudi Arabia and Iran

Early History of the Women's Movement

Before oil brought glory, Saudi Arabia was known as a country with a vast desert landscape. In this condition, people depended their economic life on the trade sector. Trading activities then created a habit for male-dominated traders to leave their families for long periods of time, while women would stay and take over all the housework. Due to a role limited to domestic work, women became invisible in society. Women do not have any authority over their bodies, and this rule is enforced based on Wahabi ideology **[11]**. Saudi Arabia's strict gender segregation is rooted in Wahabism. Wahabism is the main ideology that forms the basis for every policy made by the Saudi Arabian government. It has developed since the 18th century, with the aim of calling for a return to Islam in accordance with the Qur'an, the Sunnah of the Prophet, and the teachings of the Companions and previous scholars. The term wahabi is often used to represent the thinking in Saudi Arabia used by many Islamic renewal movements **[12]**.

This understanding gave birth to various forms of restrictions on women. Many restrictions are present in policies, such as women being obliged to be under male authority or guardianship, ranging from fathers to husbands. Women are also required to wear a black abaya and niqab veil as a symbol of compliance with the dress code. In addition, women's access to education and employment is also restricted. Even in everyday life, women are required to subordinate their personal desires for the benefit of their husbands, including in terms of fulfilling sexual needs, even in situations that are unfair or emotionally and physically coercive **[12]**. The existence of women in Saudi Arabia began to be taken into account during the leadership of King Abdullah, he appointed a woman to be appointed as deputy Minister of Education in 2009, indirectly redefining gender roles that had been formed in Saudi society. Then in 2010, the UN adopted the 17th Sustainable Development Goals (SDGs), of which Saudi Arabia is a member state.

Agenda 5 of the SDGs specifically emphasizes the importance of gender equality and in support of this agenda, Saudi Arabia participated as one of 45 countries in the UN WOMENS RIGHT COMISSION panel, an international forum that aims to promote gender equality and women's empowerment. Saudi Arabia also gained the support of 47 other member states in an effort to reduce things that are contrary to gender equality. In addition, Saudi Arabia was also elected to the executive board of the UN Entity For Gender Equality and has been actively making policies from 2019 to 2021 **[13]**. In line with international commitments, Saudi Arabia launched Saudi vision 2030, a framework of long-term goals and was formed based on the strengths and capabilities of the Kingdom of Saudi Arabia. The background to the emergence of this policy is due to the drastic decline in oil prices in the 2014-2015 period, Saudi Arabia itself is the largest petroleum exporting country and has 18% of the world's oil reserves so this has a very significant effect on the economy and social situation of the Kingdom of Saudi Arabia. Saudi Vision 2030 emerged to reduce Saudi Arabia's dependence on natural resources, especially oil. Saudi Vision 2030 includes political reform, economic modification and social reform. The policies included in social reform are the policies that have the most influence, especially for women **[13]**.

Meanwhile, in Iran, the government system operates under the concept of Wilayatul Faqih or the government of the ulama, which originates from the doctrine of Imamah in Shia theology. This concept places the ulama or faqih as the highest center of leadership, followed by the concept of trias politica whose members are elected through general elections as a democratic country should. The concept of Wilayatul Faqih integrates a system with the authority of theocracy (God) and democracy (humans) or known as a theo-democratic system. Although it has 2 government systems, the most dominant authority is theocracy, as regulated in the Constitution of the Islamic Republic of Iran article 56. Having the same pattern as wahabism, the concept of Wilayatul Faqih with Wali Faqih as the leader has the highest authority to regulate all aspects of social and state life including the pillars of government in Iran. With this, Iran truly represents Islam in a state. But this is quite polemical, because many policies restrict women. Among the most controversial are the forced use of the hijab, marriage, divorce and child custody laws. Not only that, women who want to travel with the opposite sex must show proof of kinship.

And after Ahmad Dinejad assumed the presidency in 2004, the moral police was established with the task of enforcing rules regarding modesty of dress and social vices. The moral police have access to power, weapons, detention centers and have control over education centers **[14]**. As is the case in Saudi Arabia, society in Iran is very attached to its religious traditions, namely the Islamic Mahzab Jafari or Shia Twelve Faiths. Within Iran itself, women are divided into three categories, traditional, Islamist, and secular. Traditional people are those who support the Islamic system of government and have given themselves to live according to Islamic law and are willing to undergo domestic customs. The Islamist community consists of people who believe in the teachings of Islam but have the view that any gender roles established in policies based on Islamic understanding do not actually come from Islam but from the influence of patriarchal culture. So the goal of this group is to make efforts to reinterpret gender roles that are actually in accordance with Islamic principles. The last category is secular society, which is completely opposed to Wali Faqih as a state system. Secular societies feel that women are the most disadvantaged in government and propose to separate religion from politics **[14]**.

The Iranian women's movement continues to grow today. Several organizations, media publications and women's journalism were formed to fight for women's rights and freedom through various means. There are several women's organizations, such as Ettehade Melli Zanan, Anjimane Rahiae, Jamiate Bidarie Zan, Jaminate Zanane Mobarez, and Etehade Engelabie Zanane Mobarez, each of which has a published paper or magazine. Along the way, all women's organizations came under pressure from the government and were considered stooges of western imperialism and tended not to have access to politics. However, the fate of Iranian women began to change after the 1997 elections, when Mohammad Khatami became president. Mohammad Khatami, who came from reformist circles, appointed several female figures to important positions in the government, such as vice president, head of the women's protection organization, women's relations bureau, and presidential advisor for women's affairs. Iranian women's self-confidence has also increased, as evidenced by the proliferation of organizations, conferences and seminars related to women's issues. On the other hand, the enforcement of the dress code continues, which is counter to the progress of Iranian women in terms of education, politics, economy and national development.

The main difference in the dynamics of feminism in the two countries is the ideological foundation that influences the power system. Saudi Arabia, with its conservative Wahabist values, has established boundaries for women in the domestic and social spheres, which then reached a turning point with the emergence of Saudi Vision 2030. In the context of this change, the state clearly creates a narrative of gender equality as a political and economic strategy, in other words, feminism develops top down through global agendas such as the SDGs. Meanwhile in Iran, the political system is based on the concept of Wilayatul Faqih. Just like Wahabism in Arabia, the concept of Wilayatul Faqih also presents a system that limits women. The difference is that the women's movement in Iran is much more organic, moving from the grassroots or bottom up because it faces such a repressive state. In short, feminism in Saudi Arabia and Iran developed into two contrasting elements. In Saudi Arabia, feminism is directly constructed by the state to support modernity but still wrapped in a patriarchal system, and in Iran, feminism emerges as a form of grassroots resistance to repressive state ideology, which limits the meaning of women's bodies and voices. This difference in approach demonstrates how power structures and religious interpretations influence the direction of feminist movements in both countries, shaping different paths for women in negotiating their rights and identities in each.

Figures, thoughts and struggles of women in Saudi Arabia and Iran over time

In Iran, several female figures play an important role in the struggle for gender equality. One of them is Shirin Ebadi, a Nobel Peace laureate, who is determined to fight for women's rights through legal channels. In his book "Iran Awakening: A Memoir of Revolution and Hope," Ebadi interprets the country's religious and legal system as discriminatory against women and children. Initially, Ebadi supported the Islamic Revolution, but later became disillusioned when she realized that women were not allowed to become judges. He lost his post as chief justice and was transferred to an administrative position as secretary. This condition forced him to fight for his rights, even against the policies of the conservative post-revolutionary government **[15]**. After experiencing various pressures, in 1993, he finally regained his professional rights when the Iranian Ministry of Law allowed him to officially open a lawyer's office. Her struggle in the field of law has had a major impact, especially in paving the way for women to return to work as judges in Iran. As a result of her struggle, the ban on female judges changed. As of 2010, more than 300 women were serving as judges. However, they still face restrictions, which only allow them to handle family law cases such as marriage, divorce, and inheritance, and they have not occupied a strategic position as court leaders **[15]**.

While in Saudi Arabia, Amina Wadud became one of the figures who actively fought for the rights of women. Her studies of women in the Qur'an are rooted in the social and historical context of African-American women struggling for gender justice. The main objective of her research is to formulate objective criteria to evaluate whether the position of women in Muslim culture truly reflects Islamic values regarding women in society. More specifically, Amina Wadud wants to show that the worldview promoted by the Qur'an can be adapted to the problems of women in the modern era **[16]**. In its Tafsir approach, each verse is analyzed based on five aspects: the historical context of the verse, the relationship with similar themes in the Qur'an, linguistic and syntactic aspects used in other verses, Qur'anic principles that may reject it, and based on the Qur'anic worldview as a whole. Amina Wadud's thought, ranging from the narrative of the creation of man to the issue of women's testimony, aims to reject traditional interpretations that contain patriarchal biases. He criticized interpretations that did not reflect basic Islamic principles such as justice, equality, and universal humanity. According to him, equality between men and women does not mean that they must be identical in everything, but rather that they recognize the existence of natural differences without making them the basis of injustice **[16]**.

Women in Saudi Arabia and Iran are fighting for the right to education, employment, mobility, and participation in the public sphere as well as politics. These demands reflect the basic need to be recognized as full citizens with equal rights and responsibilities. Education is the key to the beginning of the struggle, because access to knowledge opens up space for critical awareness and the ability of women to demand their rights **[17]**. In Saudi Arabia, women's struggles revolve around the elimination of the male guardianship system and restrictions on mobility. Meanwhile, in Iran, women's struggles revolve around the representation of Islamic law on the position of women in the family and society. The struggle of women in these two countries reflects two forms of resistance to patriarchal domination over the body, language and representation of women. Ebadi uses legal representation

strategies to reclaim women's autonomy in the judicial system and demands recognition of women as equal subjects of law. Instead, Amina Wadud seeks to recreate women's symbols and language by directly attacking patriarchal roots in religious interpretation. Her feminist exegetical approach can be read as the practice of écriture féminine (writing of the female body and experience) proposed by Irigaray, i.e., the creation of a new discourse that is not subject to masculine logic.

Shirin Ebadi and Amina Wadud show two different forms of feminism in an Islamic context, Ebadi-based legal resistance within the state, while Wadud-based theological and symbolic reconstruction. In Irigaray's perspective of postmodern feminism, Ebadi represents women's struggle to fit into an oppressive symbolic system, while Wadud seeks to reinvent language and meaning as an autonomous subject. Both show that feminism in the Islamic world deals not only with political structures, but also with symbols, discourses, and meanings about the body and the role of women themselves.

Challenges faced by women

Saudi Arabia

Women in Saudi Arabia have for decades faced a variety of institutionalized structural barriers in the legal system and social norms. One of the biggest challenges is the male guardianship system, which requires women to obtain permission from a male guardian to perform basic activities such as traveling, getting married, or working. Although some of these regulations have been relaxed in recent years, their influence is still felt strongly in everyday life and often reinforces the dependence of women on male figures in the family **[17]**. In the education and employment sectors, despite progress, gender-based discrimination still occurs. Women have only begun to be allowed to work in certain sectors more openly since the Vision 2030 reforms. Women's participation in the economy is increasing, but they still face challenges in obtaining leadership positions as well as access to equal economic rights. Unequal pay and limited access to strategic areas of employment show that structural discrimination persists. Women's political participation is also limited. The government has allowed women to participate in local elections and hold certain positions in government institutions, but access to higher office remains restricted.

Women were often appointed in symbolic or administrative roles, rather than in strategic positions of substantive power. This shows that although political reforms are taking place, their impact on women's empowerment is still partial.In addition, many of the changes that have occurred are top down, which means that reforms are carried out at the initiative of the government and not through civil society pressure. Social transformation does not always go hand in hand with formal policy changes. Many conservative societies still hold traditional values that limit women's space, so even when new regulations are implemented, their implementation is often hampered by cultural resistance. Finally, psychosocial barriers and socio-cultural pressures also exacerbate women's limitations. Stigma against women who are active in the public sphere, gender stereotypes, and social discrimination make women reluctant or even afraid to demand their rights openly. This shows that the challenges facing Saudi women are not only structural and legal, but also cultural and psychological.

Iran

In Iran, the main challenges facing women are rooted in state regulations that curb individual freedoms, especially in terms of dress and participation in the public sphere. Mandatory hijab rules have been strictly enforced since the 1979 Islamic Revolution, and any violation of them can lead to imprisonment or a fine. This control over the manner of dressing is not only a symbolic form, but also a means of state domination over the body and expression of women in public space. Family law in Iran also reflects the apparent inequality between men and women. In cases of marriage, divorce, and child custody, women are in a legally weaker position. For example, men can divorce their wives more easily, while women have to go through a complicated and restrictive legal process. This inequality is compounded by the lack of legal protection against domestic violence, as well as restrictions on inheritance rights and legal testimony for women. Women activists demanding equality often faced harsh repression from the state apparatus. Movements such as "My Stealthy Freedom" and protests against the mandatory hijab have often been met with arrests, torture and media silence. The state not only limited the space of women's civic organizations, but also actively monitored and suppressed any form of resistance to the patriarchal system legitimized by conservative interpretations of Islam **[18]**.

From Irigarat's point of view, the condition of women in Saudi Arabia and Iran illustrates the restrictions on women's bodies and identities and is always presented through a patriarchal system. In Saudi Arabia, women do get space by the state, but only within the confines of the male narrative institutionalized in patriarchal power structures, they are not given the language to be full subjects in the system. According to Irigaray this is a form of assimilation without articulation, where women do not create their own meaning for their bodies and existence. While in Iran, despite the harsher repression, women's resistance through the removal of headscarves or online campaigns is a form of rewriting women's identity and language by using the body as a political articulation space. Iranian women created alternative symbols, narratives, and discourses that challenged patriarchal symbolic structures, in keeping with Irigaray's idea that true emancipation demanded the creation of a new system of meaning, rather than mere involvement in the old system.

Thus, Saudi Arabia and Iran represent two forms of dynamics in the direction of feminism where one shows a form of freedom dating and governed by the state, and the other shows a symbolic resistance by women. Both underscored that women's struggles are not just about the law or formal access, but primarily about who has the power to define women's bodies, identities, and voices in society.

Dynamics and direction of reform

The women's movement in Saudi Arabia is characterized more by a top-down approach, that is, changes initiated by the state through policy reforms, rather than from the collective demands of the women's society directly. This approach can be traced back to the launch of Saudi Vision 2030, a national development blueprint announced by Crown Prince Mohammed bin Salman in 2016. In this vision, the issue of women's empowerment becomes one of the important pillars of social reform. The country has gradually relaxed a number of policies that have limited women's mobility, such as a ban on driving, the need to get permission from a male guardian to travel, and limited access to the world of work. One of the symbolic moments of this top-down policy was the abolition of the driving ban for women in June 2018, a decision announced directly by the Kingdom and welcomed as a symbolic victory. Furthermore, in 2019, Saudi Arabia lifted a ban on women from traveling abroad without the permission of a male guardian, as well as giving them the right to register child births, marriages and divorces rights that previously belonged only to men. In the economic sector, the government is opening up more opportunities for women to work in sectors that were previously only reserved for men, such as hospitality, retail, and creative industries **[19]**.

However, this top-down approach does not necessarily indicate that women have the power to negotiate their rights independently. Many reformist policies that seemed progressive actually went hand in hand with repressive measures against women activists who fought for these rights before the state regulated them. For example, some women activists, such as Loujain al-Hathloul, known for her campaigning for the right to drive, were jailed even though the state eventually lifted the ban. This shows that despite the reforms undertaken, state control over the direction and narrative of the women's movement remains strong. Change does not come from grassroots pressure, but from political elites who want to shape a new, more modern and moderate international image.Thus, women's reform in Saudi Arabia reflects the dynamics of state-directed institutional feminism rather than grassroots feminism. States are major actors in defining the boundaries and content of so-called "Women's empowerment", and these movements often serve as strategies for gaining international legitimacy and attracting global investment, rather than for substantively liberating women. This top-down approach deserves criticism because it opens up a space for conditional participation, while maintaining patriarchal structures in a new, more disguised form **[12]**.

Some of the policies that influenced the reform and women's rights include :

a) 2017, elected Sarah Al Suhaimi as the head of the Saudi Arabian stock exchange and made her the first woman to serve in the government.
b) May 2017 saw the first time Saudi women were able to access health facilities without the consent of a male companion or guardian.
c) November 2017, saudi Arabia issued a Wusool transportation program designed specifically for female workers.
in 2018, women are no longer excluded as spectators in sports courts.

e) 2018, women have been allowed to launch their own businesses and even given support in the form of electronic services from the government without the need for a male guardian's permission.
f) 2018, Women are allowed to drive and drive private vehicles legally.
g) 2019, the entrance of each restaurant is no longer differentiated by gender.
h) 2019, women over the age of 21 are already allowed to travel without the official permission of a male guardian.
i) 2019, a new visa program that no longer requires female tourists to wear abayas remains remain modestly dressed including around the beach.

This form of expansion of women's movement space in saudi Arabia is the impact of changes in the identity and interests of the country. Recognizing that oil is a resource that can run out at any time, a new policy was designed involving women so that the whole society can take a role in the development of Saudi Arabia **[12]**.

The Saudi Vision 2030 policy is evidence that Saudi Arabia is shifting its attention away from oil to more profitable sectors. A process that certainly takes a lot of effort in terms of any kind of political, religious, social and economic culture. Cultural and religious factors always put women in a position behind men. Saudi vision 2030 is the key to the kingdom of saudi Arabia. This vision is an opportunity for saudi women to develop and invest in their capabilities. Before there was this vision, women always tried to show their talents in different corners of the room but still did not improve their performance and percentage in the realm of employment. This policy is also a tool that helps release the dependence of the government that has been leaning on the economic sector, certainly an impressive economic reform challenge.

Then in Iran, the women's movement developed in a bottom-up manner, characterized by the active involvement of the female community in expanding the space of participation without relying on state initiatives. Although the Islamic post-revolutionary regime implemented Sharia law-based policies that restricted women's roles in public spaces such as the obligation to veil, the Prohibition of singing in public, and the restriction on traveling without the permission of male guardians, Iranian women showed forms of symbolic and structural resistance that grew from the grassroots. One of the most prominent forms of resistance is their successful access to higher education. According to UNESCO data (2015), more than 60% of university students in Iran are women, even in formerly male-dominated fields such as engineering and medicine. It shows that Iranian women use the educational path as a strategy of social mobility and a subtle form of defiance against restrictive structures.

Furthermore, Iranian women's activism is also seen in the field of law and Human Rights. Nasrin Sotoudeh, a prominent civil rights lawyer, became a symbol of Iran's women's struggle as she defended activists and women arrested for refusing to wear headscarves in public. Despite being sentenced to 38 years in prison and 148 lashes in 2019, her struggle still inspires many women to fight legalistically. The One Million Signatures Campaign (2006) is also evidence of the collective mobilization of women to reform discriminatory family law through petitions and door-to-door Legal Education.

In the digital age, Iranian women's resistance is transforming into a more fluid and massive movement, such as through the "My Stealthy Freedom" campaign launched by Masih Alinejad in 2014. The campaign encourages Iranian women to share photos or videos of themselves without a headscarf via social media, in a form of rejection of state control over their bodies. This action later developed into the "White Wednesdays" movement, in which women wore white every Wednesday as a symbol of peaceful protest. In these actions, digital power is harnessed as a new space to expand solidarity and fight against the single narrative of the state. When the tragedy of the death of Mahsa Amini on September 16, 2022 of a young woman who died in the custody of the moral police for not wearing the hijab properly, huge protests broke out throughout Iran. Women took to the streets, removed their headscarves, cut their hair in public, and led the masses in demonstrations that later spread internationally (The Guardian, 2022; Amnesty International, 2022).

Despite the country's repressive response, Iran's women's movement continues to strengthen through non-confrontational channels such as women's cooperatives, locally-based educational communities, and participation in micro and social enterprises. It affirms that Iranian women are not merely victims of a theocratic patriarchal system, but also active actors strategically developing contextual forms of feminism. By leveraging local resources and global technology, Iranian women have managed to craft a model of resistance that targets not only symbolic change, but also slow but sustained structural transformation.

All the policies contained in the framework of Saudi Vision 2030 show the reconstruction of the meaning of the position of women in Saudi society, even if it is top-down. Looking from Irigaray's point of view, the whole policy is still said to be a framework of male symbols, because every definition of the policy towards women's freedom comes and is controlled by the state. As it is written in one of his works, Irigaray considers women always positioned as "the Other" or as a complement of men rather than as a whole object. The main narrative in women's policy in Saudi Arabia is the modernization of the state controlled by the state itself in the interests of the economy and global image, not because of the demands of feminism or grassroots pressure. The country is using women's issues as part of a social transformation project embodied in Saudi Vision 2030, aimed at reducing dependence on oil and opening up new economic sectors. In this narrative, women are positioned as agents of development, but within symbolic limits and frameworks that remain controlled by the state. Gender reform did not fundamentally change patriarchal structures, but accommodated women to the extent that they could contribute to the vision of the state.

While in Iran, every grassroots movement reflects the resistance of the female body to a repressive symbolic system, one of them is the public response to the death of Mahsa Amini. This is in line with Irigaray's concept of the body as the ultimate symbolic space for usurping autonomy, where Iranian women do not wait for legalization from the state but instead use their bodies directly as a political tool and expression of identity. The main narrative of women's policy in Iran is ideological control over women's bodies and living space as part of the project of Islamization of the country. In the Wilayatul Faqih system, women are placed as moral guardians of society through symbolizations such as compulsory hijab and social restrictions. However, continuous repression only fuels resistance. Feminism in Iran exists as a resistance to the state, with the body as the main symbol of defiance, and continues to develop through education, grassroots organizations, and social media. The state seeks to maintain its symbolic power, while women create alternative spaces through activism, reinterpretations of Islam and secular movements.

Social and cultural perspectives

The differences in women's policies in Saudi Arabia and Iran cannot be separated from the social and cultural structures that shape both. Saudi Arabia has a historically very conservative and Wahhabist-oriented society. Despite this, the state elite is now working to encourage a gradual transformation of values through the media, education and state regulation. One of the key moments was when Saudi Arabia lifted its ban on women driving, which was part of the economic modernization outlined in Saudi Vision 2030.

In Iran, patriarchal culture is wrapped within the framework of a revolutionary Islamic ideology that emphasizes piety as a national identity. The imposition of symbols such as the hijab, gender segregation, and control over the media helped cement the state's hegemony over women. On the other hand, urbanized societies in Iran show stronger resistance to traditional norms, creating a conflict of values between the state and the younger generation (Shirazi, 2020). The level of public acceptance of the changing role of women in the two countries is also different. In Saudi Arabia, change is easier to accept when it comes from state authorities. In contrast, in Iran, society is more critical of the state, but also more fragmented in accepting the idea of gender equality, depending on social, geographical and ideological background.

Impact and implications

Policy reforms in Saudi Arabia have opened up a number of new spaces for women, especially in education, the economy, and limited participation in government institutions. Women can now work in the public and private sectors, travel without a guardian's permission, and attend public forums that were previously closed to them. Although not fully equitable and still facing cultural resistance, these advances reflect how the state can be a motor of change in creating opportunities for women through top-down reforms **[17]**. Meanwhile, in Iran, the space for women's participation, especially in politics and policy-making, is still very limited. Although women managed to occupy important positions in academic and professional worlds such as medicine, they remained constrained by patriarchal legal frameworks and strict social supervision. The women's movement in Iran is more informal, grassroots, and fraught with risk as the state actively controls and represses forms of expression that challenge the institutionalized patriarchal order.

This comparison shows that top-down change strategies in Saudi Arabia and bottom-up in Iran directly shape the effectiveness, wiggle room, and security level of different women's movements in each country. From the point of view of Luce Irigaray, the situation in Saudi Arabia reflects the symbolic assimilation of women into the patriarchal system through state-regulated representations. The reforms provided by the state allowed women to enter the public structure, but still through the logic and language of men, a symbolic system that had not been designed to accommodate women's differences. Irigaray mentions that as long as women are given space only within the framework of men (Law, economy, government), without creating their own symbols and language, then they become only a reflection of men, not an autonomous subject. Saudi Arabian women, in this case, have not been given the space to define themselves symbolically, but rather have only been facilitated within limits that remain patriarchal.

In contrast, in Iran, although formal space for women is limited and fraught with risks, it is precisely from the oppression that a deeper form of resistance is born symbolically and politically. Iranian women's movements, such as the anti-hijab movement or the "My Stealthy Freedom" Campaign, are a form of rejection of the masculine representation system, as well as an attempt to build alternative narratives about the female body and identity. In Irigaray's perspective, it is a manifestation of feminine écriture or female body writing and expression against male dominant language. By taking over their bodies as a political space, Iranian women deconstruct the hegemonic narrative of the state and try to create a discourse about their existence as women. Thus, through Irigaray's point of view, it can be judged that the struggle of women in Iran, although more repressed, actually has greater radical potential because it seeks to challenge oppressive symbolic logic, not just enter its space. In contrast, Saudi women may gain faster access to the public sphere, but still within the confines of a system that has not really changed in the way it defines and defines women.

6. Conclusions

A comparative study of women's policies in Saudi Arabia and Iran shows how ideological and political structures shape the way the state regulates women's bodies, spaces and roles. In Saudi Arabia, women's policy operates within a state-controlled modernization framework. Through Saudi Vision 2030, women are given the space to work, drive and participate in public spaces as part of an economic transformation project. The main narrative in this policy is the state as the pioneer of reform, where women's involvement is seen as an instrument of achieving national development, not as the result of an independent feminist struggle. Feminism in Saudi Arabia comes in an accommodating and top-down form, institutionalized within a masculine system and only given space to the extent that it does not challenge existing political and religious authority.

Meanwhile, in Iran, the state exercises control over women through the Wilayatul Faqih ideology, where religious leaders have absolute authority over the laws and morals of society. Policies such as compulsory hijab, social restrictions, and the establishment of a moral police reflect an ideological project to regulate women's bodies as symbols of state piety. However, the main narrative in Iran is not reform, but repression and control, which triggered the birth of forms of resistance feminism from below. Sections must summarize briefly and concisely the contents of the document or essay. Iranian women use education, law, and social media to resist the patriarchal symbols of the state, making the body and digital space the main arenas of resistance.

In terms of Luce Irigaray's postmodern feminism, these two contexts reflect how women are constantly constructed by masculine symbolic systems that erase their bodily and linguistic autonomy. In Saudi Arabia, women's reform does not dismantle patriarchal structures, but rather assimilates women into the masculine system for the benefit of the state-a simulation of freedom without true autonomy. In Iran, women created forms of écriture féminine, the "writing of the female body", as symbolic and political resistance. When the body is used as a tool of expression such as removing the hijab, cutting hair, and uploading protest photos, the resistance creates a new language that is not subject to state symbols. This form of postmodern feminism does not simply demand rights in patriarchal language, but forms an alternative symbolic structure through women's own experiences. Thus, feminism comes in two contrasting elements. The top-down approach in Saudi Arabia produces a state-dependent, institutionalized feminism that is limited to the boundaries set by the political elite, while the bottom-up approach in Iran produces a feminism that is more radical, based on direct experience, and grows as a form of resistance to the patriarchal state. This difference

shows that gender politics in contemporary Islamic states is largely determined by the state's position towards women, whether it is merely a tool in the development narrative, or an enemy rather than an ideology.

REFERENCE

[1]. Hamdan, "Women and education in Saudi Arabia," 2005.

[2]. I. F. A. F. Nevy Rusmarina Dewi, "Dinamika Kesetaraan Gender di Arab Saudi: Sebuah Harapan Baru di Era Raja," 2024.

[3]. K. U. W. W. H. J. Nahdhiyatus Sholihah, "TRANSFORMATION OF THE ROLES OF SAUDI ARABIAN WOMEN," 2023.

[4]. M. C. ANAM, "PERAN PEREMPUAN DI IRAN PASCA REVOLUSI 1979," 2022.

[5]. D. Yuliani, "DARI KARTINI KE POSTMODERNISME: EVOLUSI PEMIKIRAN FEMINISME," Jurnal Ilmiah Ilmu Administrasi Negara, 2025.

[6]. H. D. H. Z. A. A. W. P. Idha Ismalia Rohmatika, "Perlawanan dan Pemberontakan Perempuan Iran dalam Perspektif Feminis dan Islam," 2022.

[7]. H. Hoodfar, "The Women's Movement in Iran: A Historical Perspective," 1997.

[8]. K. Mikail, "POLITIK DAN PEREMPUAN: Perjuangan Politik Perempuan di Iran," 2015. https://doi.org/10.21043/addin.v9i2.615

[9]. K. Thompson, "Feminisme Postmodern," 14 Augustus 2023.

[10]. L. A. Zendo, "Pandangan Luce Irigaray Tentang Feminisme," 2023.

[11]. M. Dr. Nursapia Harahap, "Penelitian Kualitatif," 2020.

[12]. M. Lingga, "Kasus Jilbab Masya Amini: Dinamika Gerakan Feminisme di Negara Islam," 2024. https://doi.org/10.47766/saree.v6i1.2386

[13]. N. K. Suwastini, "PERKEMBANGAN FEMINISME BARAT," 2013.

[14]. R. R. Y. F. R. Nursyahbani, "FEMINISME BARAT DAN TIMUR (studi komparasi pemikiran Simone De Beauvoir dan Murthdadha Muthhari)," 2023.

[15]. S. A. A. M. F. K. Saepudin, "Gerakan Sosial Wanita Iran Pasca Kematian Mahsa Amini," 2024. https://doi.org/10.31605/lino.v4i1.3462

[16]. S. Assa, "Unveiling a Feminist Strike: The Case of 'Woman, Life, Freedom' in Iran," 2023. https://doi.org/10.7202/1109372ar

[17]. S. H. S. M. H. H. S. M. Analieza Ilmiatun Mufiedah, "REFORMASI HAK-HAK PEREMPUAN ARAB SAUDI MELALUI SAUDI VISION 2030 TAHUN 2017-2019," 2021.

[18]. U. I. Muttaqin, "PEMIKIRAN FEMINISME AMINA WADUD," 2020.

[19]. Z. S. Salhi, "Striving for autonomy and feminism: What possibilities for Saudi Women?," 2024.