UN WOMEN

Confronting Gender Apartheid: Responding To State-Enforced Dress Codes And Female Erasure In Iran And Afghanistan

Inspired by ongoing protests and systemic oppression. Can global diplomacy protect women's agency without undermining cultural identity?

I. Introduction: Confronting Gender Apartheid in the 21st Century

In recent years, women in Iran and Afghanistan have faced escalating restrictions that go far beyond dress codes. What we're witnessing is the systematic removal of women from public life: from schools and universities, from workplaces, from media, and even from the street.

In Iran, the death of Mahsa Amini in 2022 after her arrest by the "morality police" triggered widespread protests. These demonstrations, led by women and joined by students, workers, and artists, were not simply about the hijab. They were a rejection of a broader system of control over women's autonomy, visibility, and agency.

In Afghanistan, the return of the Taliban in 2021 marked a turning point. Women and girls were banned from secondary schools and universities. They were pushed out of most jobs and told to stay home. Dress codes were imposed with the threat of punishment. In some cases, they were even ordered to erase themselves from the public sphere altogether, to remain unseen, unheard.

This reality has led many international observers to refer to these policies as a form of gender apartheid: a system of governance that enforces the segregation and subordination of women based on gender. Though not yet recognized under international law as a distinct crime, the term reflects a growing understanding that gender-based oppression can be structural, deliberate, and sustained by the state.

For UN Women, a body dedicated to advancing gender equality and empowering women globally, this raises urgent questions. How can the international community respond to these situations without reinforcing stereotypes or imposing external frameworks? Can diplomacy promote universal rights while respecting cultural complexity? And how can multilateral institutions act when governments themselves are the architects of exclusion?

II. Conceptual Foundations: Understanding the Structures Behind the Crisis

Before examining the policies and consequences in Iran and Afghanistan, it's essential to understand the underlying frameworks that shape this crisis. Gender-based exclusion is not an isolated phenomenon. It is often legitimized through legal systems, reinforced by social norms, and protected by state power.

1. Gender Apartheid

The term gender apartheid describes a state-enforced system of segregation, exclusion, or subordination based on gender. Though not formally recognized as a crime under international law, it is increasingly used by scholars, lawyers, and human rights advocates to describe the deliberate removal of women from public and political life.

2. State-Enforced Dress Codes

Dress codes in both Iran and Afghanistan are more than matters of tradition or religion: they are instruments of state control. What women wear becomes a way to regulate where they can go, what they can do, and whether they are allowed to participate in public life. In Iran, the mandatory hijab is legally enforced, with consequences ranging from fines to imprisonment. In Afghanistan, policies have mandated full-body coverings and restrictions on women's movement without a male guardian. These regulations are often presented as cultural or religious obligations, but they are enforced through state power, not personal choice.

3. Erasure from Public Space

In both countries, restrictions extend beyond clothing. Women have been removed from classrooms (bans on secondary and university education), workplaces (especially in NGOs, media, and government), and media visibility (faces blurred or removed from television, advertising, and even social media). This form of erasure is not only about controlling behavior, it is about removing women as visible, active participants in society. It poses long-term consequences for gender parity, economic development, and civic representation.

4. Cultural Relativism vs. Universal Human Rights

This debate lies at the core of international responses. Can one standard of gender equality be applied globally, or must human rights be interpreted differently in each cultural and religious context? Cultural relativism argues that international norms should be flexible enough to respect cultural and religious traditions. Universalist perspectives hold that basic rights, including freedom of expression, education, and bodily autonomy, must be upheld regardless of local customs.

5. Intersectionality
Not all women experience oppression in the same way. Ethnic and religious minorities (for example, Hazara women in Afghanistan, or Kurdish women in Iran), as well as LGBTQ+ individuals, often face multiple layers of exclusion. Understanding gender apartheid requires acknowledging how oppression is structured by gender, ethnicity, religion, class, and geography; how urban women may resist differently from rural women; and how the digital divide shapes who can organize, speak out, or be heard.

6. Language and Legitimacy
Finally, language matters. The way we describe these policies, as "conservative," "traditional," or "oppressive", can either mask or expose their political intent. We should be aware of how terms like freedom, respect, morality, and agency are used, by states, by protestors, and by international actors, to justify or challenge power.

III. Country Contexts: Iran and Afghanistan

The cases of Iran and Afghanistan are often discussed together, yet each country's trajectory reflects a distinct political system, historical experience, and relationship between religion, law, and gender. Understanding these contexts is key to grasping the complexity of the issue, and to avoid oversimplified comparisons.

🇮🇷***Iran****: Between Resistance and Repression*
In the Islamic Republic of Iran, the control of women's bodies has been a cornerstone of the state's identity since the 1979 revolution. The mandatory hijab law, passed shortly after the establishment of the Islamic Republic, became one of the regime's clearest symbols of ideological authority. Refusing to comply is treated not simply as a cultural offense, but as a political act.
The enforcement of these laws, often through the *Gasht-e Ershad*, or morality police, has led to decades of tension between the state and society. While some women comply, others resist in subtle or overt ways: loosening their headscarves, posting videos online, organizing flash protests. This quiet resistance came into full public view in 2022, following the death of Mahsa Amini, a 22-year-old woman detained for "improper hijab." Her death triggered protests across the country, led largely by women and young people. The slogan "Woman, Life, Freedom" became a rallying cry not just against clothing laws, but against the broader system of gender-based control.

The state's response was severe. Security forces cracked down, internet access was restricted, and protesters were arrested or killed. Yet the movement marked a turning point: the issue of women's rights, long marginalized in official discourse, became central to a wider debate about freedom, governance, and Iran's future.

Importantly, Iran has a large, well-educated female population and a history of women's activism. This creates a tension between formal legal restrictions and a society that, in many parts, pushes back.

🇦🇫***Afghanistan****: The Total Erasure of Women*

Afghanistan presents a starkly different context. The fall of Kabul in August 2021 and the return of the Taliban to power marked a near-total rollback of the rights Afghan women had gained over two decades. Within months, girls were banned from secondary schools. Women were told to stay home from work. Travel without a male guardian became forbidden. In many parts of the country, even parks and gyms were declared off-limits.

The Taliban operate through a combination of decrees, intimidation, and theocratic rule. There are no clear checks on power, no space for protest, and few avenues for public dissent, particularly for women. Enforcement varies by region, but the message is consistent: women should be invisible.

This erasure extends beyond policy. In many media outlets, female news anchors were removed from the air or forced to appear fully covered. Government buildings eliminated roles for women. Even international NGOs, once a lifeline for Afghan women's employment, were pressured to dismiss female staff or cease operations altogether. The Taliban justify these actions by referencing their interpretation of Islamic law - yet Afghan women's rights activists, both inside the country and in exile, argue that these policies are not rooted in religion, but in ideology and the consolidation of power.

What makes Afghanistan's situation particularly complex is the near-total isolation of the regime. Sanctions, diplomatic breakdowns, and the absence of formal recognition have limited the leverage of international actors. At the same time, the humanitarian crisis worsens, and women are increasingly cut off from aid, education, and support.

IV. International & Historical Precedents

Understanding the global response to gender apartheid in Iran and Afghanistan requires looking beyond the immediate moment. Neither the repression of women nor the international struggle to address it is new. Throughout history, the treatment of women has been both a symbol of political ideology and a battleground for international legitimacy.

One of the most powerful comparisons often made is with racial apartheid in South Africa. That system, formally in place from 1948 to 1994, was eventually condemned by the United Nations as a crime against humanity. The world responded with diplomatic isolation, sanctions, and a global civil society campaign that linked internal resistance with external pressure. Although the context was different, the core idea, that systematic exclusion based on identity is not simply unjust but illegal, continues to influence today's discussions around gender apartheid.

However, applying the apartheid framework to gender presents legal and political challenges. The term gender apartheid has no formal standing in international law, even though it is widely used in advocacy, journalism, and academic literature. The Rome Statute of the International Criminal Court defines apartheid in terms of race, not gender. Some experts and activists argue that this gap in the law reflects a deeper problem: that violations of women's rights are often seen as cultural issues or secondary concerns, rather than as structural violence deserving the same level of global response as racial oppression or ethnic cleansing.

Despite this, the United Nations has taken positions on state-enforced discrimination against women. In the 1990s, during the Taliban's first period of rule in Afghanistan, the UN General Assembly passed several resolutions condemning gender-based restrictions. Similar statements have been made in recent years, though their legal weight remains limited. UN Women, along with other agencies, has issued strong statements calling for women's full participation in Afghan society and for accountability in Iran. These declarations raise awareness but have little enforcement power.

Additionally, in Sudan, before the fall of the al-Bashir regime, public order laws were used to arrest women for clothing deemed inappropriate. In Saudi Arabia, until recently, women could not drive or travel without male permission. In both countries, international pressure, economic shifts, and internal advocacy contributed to gradual change, but not without backlash or unintended consequences. Sanctions or condemnations can raise global awareness but may also deepen authoritarian resistance or harm local populations. Symbolic actions, such as denying seats to governments on UN bodies, can signal disapproval, yet their impact depends on broader diplomatic alignment. In short, there is no single precedent that offers a clear path forward.

V. Key Challenges & Debates

The issue of gender apartheid in Iran and Afghanistan raises more than concern - it demands reflection on the boundaries of global diplomacy, the meaning of solidarity, and the cost of silence. At its core, this crisis confronts the international community with the challenge of responding to systemic gender-based exclusion without resorting to simplifications or imposing one-size-fits-all frameworks.

Universal Rights or Cultural Imperialism?
At what point does the defense of women's rights cross into the territory of cultural intervention? Who defines cultural identity: the state, the people, or the individuals affected? Can international diplomacy protect women's rights without being viewed as neo-colonial or selective? Is there a universal threshold of human dignity that should never be negotiable?

Visibility, Advocacy, and Representation
How can international actors amplify local voices without distorting them? What role can civil society, diaspora communities, and social media play in bridging the visibility gap? When women are legally silenced, who gets to speak on their behalf, and who should?

The Sanctions Dilemma
Do sanctions help pressure regimes to change, or do they entrench them further? Can targeted sanctions, such as travel bans on officials, offer a middle ground? What alternatives exist when engagement is impossible and isolation proves harmful?

Gender Apartheid and International Law
Should gender apartheid be codified in international law? If so, how, and by whom? What mechanisms (ICC, special tribunals, UN resolutions…) would be needed to enforce such a designation? Does naming a crime without enforcing accountability weaken the legitimacy of international institutions?

Internal Resistance and Global Solidarity
What forms of resistance are already happening, and how can they be supported without putting people at greater risk? Is solidarity more effective when it's symbolic, financial, diplomatic, or legal? Can meaningful support come from institutions that have themselves struggled with gender equality?

VI. Stakeholders & Actors

State Governments

Iran and Afghanistan: As primary enforcers of gender-based restrictions, their leadership structures (such as Iran's Supreme Leader and Guardian Council or the Taliban's Emirate system) are key to understanding the implementation and justification of exclusionary policies.

Regional Powers (Pakistan, Saudi Arabia, Turkey…): These states may exert influence through religious alliances, border control, or economic ties. Some have complex relationships with gender norms themselves, positioning them as both enforcers and reformers.

Western Democracies (such as the US, EU countries, Canada): Often vocal on women's rights, these states face criticism over selective engagement and their own historical roles in the region, including military interventions and foreign aid policies.

International Organizations

UN Women: The primary body tasked with advocating for women's rights within the UN system. Its mandate includes coordination, research, and policy guidance, but it lacks enforcement powers.

Human Rights Council, UNHRC Special Rapporteurs, OHCHR: These actors have issued country-specific reports and thematic alerts on gender discrimination, though their recommendations are non-binding.

UNESCO & UNICEF: Focus on education and cultural rights, especially where school bans and erasure from the public domain are involved.

UN Security Council: While its influence is more political than gender-focused, its silence or action on Afghanistan and Iran carries symbolic weight.

Civil Society & Local Activists

Grassroots women's movements: In Iran, decades of activism, often unofficial and informal, have played a critical role in resisting control. In Afghanistan, networks of underground schools and women-led NGOs operate in secrecy, often at immense personal risk.

Exiled activists and diaspora networks: These groups often serve as vital conduits of information and advocacy, but they also raise questions of representation. Are they speaking for, with, or instead of women still inside the country?

Media & Information Ecosystems

State media in both countries reinforce narratives of morality and order, often erasing or criminalizing dissent.

Independent journalists, especially women, have faced imprisonment or exile. Yet their work remains crucial in documenting abuses and mobilizing attention.

Social media platforms play a dual role: they enable protest visibility (#MahsaAmini, #LetAfghanGirlsLearn), but are also tools of surveillance and misinformation.

Donors, NGOs & Humanitarian Agencies

International NGOs: Many organizations focusing on education, health, and women's rights have been expelled from Afghanistan or restricted in Iran. Those that remain often operate under strict limitations or in partnership with local actors.

Development agencies and donors: Governments and philanthropic foundations fund programs aimed at supporting women - but funding can become politicized, misdirected, or inaccessible in contexts where women are barred from public work.

Legal and Academic Communities

International legal scholars are driving the campaign to recognize gender apartheid as a crime under international law.

Think tanks and universities produce analyses, legal proposals, and advocacy tools, but their role often remains indirect or advisory.

FURTHER RESOURCES

Iran's Faces Of Anger: An Inside Look At The Lives Of Iranians Who Say No
https://www.youtube.com/watch?v=fEO8hJwqLk4

Why Women Are Leading The Fight In Iran
https://www.journalofdemocracy.org/why-women-are-leading-the-fight-in-iran/

How Mahsa Amini's Death Sparked The Hijab Protests That Changed Iran
https://www.youtube.com/watch?v=Ml1VwwQaSDo

Men In Iran Are Wearing Hijabs In Solidarity With Women
https://time.com/4430645/iran-hijab-morality-police/

Inside Iran: What Happened To Iran's Women-Led Uprising
https://www.youtube.com/watch?v=VAQRCCWsi-s

Radio Begum
http://www.begum.fm/

The Taliban's Rules For Women In Afghanistan
https://www.youtube.com/watch?v=L0VYaRHoqBI

Study Findings: Over 77% Of Gender-Based Violence In Afghanistan Traced To Taliban Decrees
https://8am.media/eng/study-findings-over-77-of-gender-based-violence-in-afghanistan-traced-to-taliban-decrees/

Spotlight On Women's Rights Under The Taliban
https://podcasts.apple.com/us/podcast/spotlight-on-womens-rights-under-the-taliban/id1466658814?i=1000621701519

Rukhshana Media
https://rukhshana.com/en/

"Silenced" With Afghan Journalist Zahra Joya
https://www.article19.org/resources/podcast-afghan-journalist-zahra-joya/

Iranian Women's Identity And Cyberspace: Case Study Of Stealthy Freedom
https://www.macrothink.org/journal/index.php/jsss/article/view/6284/5399