

Family, Ideology, and Gender: A Comparative Analysis of State Discourses in France and Iran

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Aile, İdeoloji ve Toplumsal Cinsiyet: Fransa ve İran'da Devlet Söylemlerinin Karşılaştırmalı Analizi

Öz

Bu çalışma, Fransa ve İran örnekleri üzerinden devlet söylemlerinin aile ve toplumsal cinsiyet rollerini nasıl yapılandığına karşılaştırmalı söylem analiziyle incelemektedir. Feminist teori ve eleştirel söylem kuramına dayanan araştırma, yasal düzenlemeler, politika belgeleri, medya içerikleri ve eğitim materyalleri üzerinden yürütülmüştür. Bulgular, İran'da devletin aileyi İslami-patriyarkal normlarla tanımladığını, Fransa'da ise toplumsal cinsiyet eşitliği vurgusu artsa da aileselciliğin sürdüğünü göstermektedir. Çalışma, siyasal rejimlerin toplumsal cinsiyet rejimlerini nasıl şekillendirdiğini ortaya koymakta ve eşitlikçi aile söylemlerinin geliştirilmesine katkı sunmayı amaçlamaktadır.

Anahtar Kelimeler: Toplumsal Cinsiyet, Aile Politikası, Feminist Teori, Fransa, İran

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Abstract

This study examines how state discourses construct family and gender roles in France and Iran through a comparative discourse analysis. Grounded in feminist theory and critical discourse theory, the research draws on legal texts, policy documents, media content, and educational materials. Findings show that Iran defines the family through Islamic-patriarchal norms, limiting women to roles of motherhood and wifehood, whereas in France, despite a growing emphasis on gender equality, the legacy of familialism persists. The study highlights how political regimes shape gender norms and aims to contribute to the development of more egalitarian family discourses.

Keywords: Gender, Family Policy, Feminist Theory, France, Iran

Makale Türü: Araştırma Makalesi

Paper Type: Research Article

1. Introduction

The family is regarded as a "fundamental" social unit in virtually every society. However, the values it embodies and the gender roles it reinforces vary significantly depending on the ideological context in which it is situated (Inglehart and Norris, 2003: 17). This article focuses on the question: *How do gender norms shape the ideological construction of the family institution?* It employs a comparative discourse analysis to examine how the state constructs its gender regime in the cases of France and Iran. By juxtaposing the official discourses on family in a secular Western democracy and a theocratic Middle Eastern regime, the study aims to expose the gender-based power strategies embedded within state ideologies.

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This inquiry holds both theoretical and societal significance. As emphasized in feminist theory, the family—often framed as part of the "private sphere"—is also a site of ideological contestation for political power (Pateman, 1989; Okin, 1989). States possess the capacity to shape citizens' values, roles, and even demographic behaviors through family structures (Korteweg, 2008). Therefore, analyzing how different political regimes define the family is critical for understanding the structural foundations of gender inequalities and the potential forms of resistance.

France and Iran are selected due to their divergent orientations regarding family and gender issues. France, grounded in the principle of secularism, has largely institutionalized gender equality through legal mechanisms and supports women's participation in public life via welfare state instruments such as parental leave, childcare services, and employment incentives. In contrast, Iran, following the 1979 Islamic Revolution, adopted a Sharia-based legal system, redefined women's rights within an "Islamic framework," and positioned the family as a moral and religious nucleus. This contrast provides fertile ground for discourse analysis: the meanings ascribed to family by a secular and egalitarian state can be compared with those embedded in the vision of a religious-patriarchal regime, revealing both commonalities and divergences.

More specifically, the selection of France and Iran follows a "most different systems design" (MDS), allowing for the comparison of two cases that differ sharply in political regime type, legal structure, religion-state relations, and historical trajectories. France represents a secular liberal democracy with institutionalized gender equality mechanisms and welfare-based family policies, whereas Iran exemplifies a religious-authoritarian system in which family law is grounded in Sharia and women's rights are explicitly conditioned by Islamic criteria. This deliberate contrast enables the analysis to move beyond contextual particularities and instead identify how the family operates as an ideological site across divergent regimes. By juxtaposing these structurally dissimilar contexts, the study seeks to reveal both regime-specific discursive formations and broader patterns in the state-led construction of gender norms.

Existing literature offers valuable insights into the relationship between the state, family, and gender (Orloff, 1993; Fraser, 1997). Feminist theory conceptualizes the family as a historical and institutional bearer of patriarchal power (Meguro, 1988; Allen, 2016), often reproducing women's subordinate status (Firestone, 1970; Hartmann, 1981). In political theory, the family is framed as an ideological state apparatus through which the ideal citizen is socialized; Althusser identified the family as one of the primary structures that subject individuals to the dominant ideology (Althusser, 2001; Smart, 1984). Nonetheless, comparative analyses of family discourse across distinct regimes remain relatively scarce. Positioned at the intersection of feminist theory and discourse analysis, this study aims to contribute to this gap in the literature.

The article is structured into six sections. The *Introduction* outlines the research question, aim, and theoretical relevance. The second section reviews the literature on the state-family-gender nexus within feminist and critical theory frameworks, alongside recent studies on family policies in France and Iran. The third section, *Methodology*, explains the theoretical foundations and research design of comparative discourse analysis, with particular reference to the contributions of Foucault, Bacchi, and Fairclough. The fourth section, *Analysis*, explores the ideological construction of the family in France and Iran through legal texts, media, education, and public discourse. The fifth section, *Discussion*, interprets the findings in light of feminist theory and compares the gender regimes of the two countries. Finally, the *Conclusion* summarizes the main arguments and offers recommendations for policy and future research.

2. Literature Review

Feminist and critical theories offer powerful conceptual tools for analyzing the ideological character of the family institution. Second-wave feminist literature, through the slogan "the personal is political," brought domestic power relations into the realm of public and political discourse (Hanisch, 1970). Theorists such as Firestone (1970) and Millett (2016) described the family as a site for the reproduction of patriarchy, while Walby (1990) distinguished between private (family) and public (state-market) forms of patriarchy, arguing that the family constitutes the core institution of private patriarchy. Pateman (1988), through her concept of the "sexual contract," emphasized that male-dominated family structures were naturalized within the foundational imaginary of the modern state. Feminist theory thus asserts that states shape gender regimes through family policies, and that this relationship is never neutral.

Similarly, critical state theories conceptualize the family as an ideological apparatus. In Althusser's (2001) theory of ideological state apparatuses, the family—like religion and education—serves as a key site through which dominant ideology is internalized by individuals. Gender norms reproduced within the family become part of the state's strategy to mold citizens (Connell and Pearse, 2009; Gal and Kligman, 2000). In nationalist regimes, motherhood is linked to the biological and cultural reproduction of the nation, whereas even in liberal regimes, policies promoting women's public participation may continue to rely on gendered assumptions that assign care work to women (Fraser, 1997; Pateman, 1988).

Discourse theory provides a crucial analytical lens for examining these ideological processes. For Foucault (1980), discourse operates at the intersection of knowledge and power, producing systems of knowledge deemed "truth." Through circulating discourses on family and gender, the state shapes individuals' subjectivities (Butler, 1997; Foucault, 1990). In this context, the state's definition of the "ideal family" establishes normative models of femininity and masculinity, thus producing a regime of truth. From a biopolitical perspective, the regulation of bodies and life is manifested through population policies, birth rates, and gender roles (Rose, 2007).

Carol Bacchi's (2009) "What's the problem represented to be?" approach reveals how policy texts construct specific problem representations. According to Bacchi and Goodwin (2016), laws and policy documents are not only tools for solving problems, but also declarations of how those problems are framed. In France, policy discourse often centers around themes such as "gender equality" or "low fertility" (Revillard, 2006; Pailhé, Rossier and Toulemon, 2008), while in Iran it is legitimized through socially conservative and religious narratives emphasizing the promotion of an "Islamic-Iranian lifestyle," resistance to Western cultural influences, and the reinforcement of traditional family values (Asadisarvestani & Sobotka, 2023: 7–8).

Fairclough (2010) and other critical discourse theorists emphasize the multilayered nature of discourse. Fairclough's model proposes that each discourse should be analyzed at the levels of textual structure, discursive practice (conditions of production and consumption), and social practice (ideological context). For instance, Iran's "Family Protection Law" should not only be examined in terms of its content, but also in terms of how it circulates through media, school curricula, and political rhetoric, and the social effects it intersects with (Wodak and Meyer, 2016; Farvardin, 2020).

In the French literature, the family is identified as a central ideological element in the construction of the Republic. Commaille (1993) describes the historical importance of the family in the French state under the concept of "familialism," an ideology that elevates the family as the foundation of social order and rests on traditional gender norms. The Napoleonic Civil Code defined the man as head of the household and made women's legal capacity dependent on their husbands (Abray, 1975: 59).

Though substantially reformed in the 20th century, traces of familialist ideology persist in policy-making processes (Revillard, 2006: 139).

Since the 1960s, the rise of the feminist movement and the establishment of governmental gender equality institutions (e.g., the Ministère des Droits des Femmes) have challenged the gendered assumptions inherent in family ideology, a development conceptualized as “state feminism” (Revillard, 2007: 211). Nonetheless, tensions persist between legal equality and social practice. Issues such as women’s disproportionate burden of domestic care, the “double shift” phenomenon, and underrepresentation in decision-making have been widely discussed in the literature (Lloyd and Bassel, 2008; Ramsay, 2008; Murray, 2012). A 2014 report by France Stratégie underscores that gender roles are shaped in early childhood and argues for transforming these norms through education policies. In this sense, France can be understood as a shifting gender regime, marked by tensions between traditional familialism and emerging equality norms (Lewis, 2006: 425-426).

In Iranian literature, the focus is on the impact of the post-1979 Sharia-based regime on women’s rights and freedoms. The Family Protection Laws of 1967 and 1975 had previously strengthened women’s legal status (Paidar, 1995), but the Islamic Republic reversed these gains and redefined the family along Islamic lines. Articles 20 and 21 of the Constitution condition women’s rights on “Islamic criteria,” a stance interpreted as subordinating women’s citizenship to the state’s religious interpretation (Shahidian, 2002; Osanloo, 2008).

The Iranian Civil Code defines the man as the head of the family (Art. 1105), conditions women’s right to work and travel on their husband’s permission, and denies alimony to women who do not fulfill their duty of “obedience” (Mir-Hosseini, 1999). These provisions are seen as the legal expression of institutionalized patriarchy (Moghissi, 1999). Messages conveyed through education policies and media also reflect this ideological framework. School textbooks reinforce traditional roles for girls and equate womanhood with motherhood, aligning with the state’s family discourse (Salami and Ghajarieh, 2016).

Population policies in Iran are also a significant component of the family ideology. While birth rates were promoted in the 1980s, they were sharply reduced in the 1990s through family planning programs (Hoodfar and Assadpour, 2000; Abbasi-Shavazi, McDonald and Hosseini-Chavoshi, 2009). However, in the 2010s, under the directive of religious leadership, pronatalist policies were reinstated. The 2021 “Law on the Protection of the Family and Youth Population” severely restricted birth control and abortion, revealing how discourse operates not only normatively but also as a biopolitical strategy.

In sum, while the literature highlights the ideological opposition between France and Iran, in both cases the family plays a central role in the construction of gender regimes. France attempts to reconcile familialism with equality norms, whereas Iran seeks to safeguard religious and patriarchal values against modern challenges. Thus, family policies must be analyzed not only as instruments of welfare or demographic control, but also as arenas of ideological struggle.

3. Methodology

This study employs a qualitative research design aiming to comparatively analyze official discourses and gender representations surrounding the family institution in France and Iran. The primary method is discourse analysis, with the analytical framework grounded in Foucault’s (1990) theory of power/knowledge, Bacchi’s (2009) problem representation approach, and Fairclough’s (2010) three-dimensional model of critical discourse analysis.

In this context, discourse is not merely understood as a linguistic structure, but as a domain of power through which social reality is produced, reproduced, and legitimized (Foucault, 1980). Following Foucault’s emphasis on the historical and epistemological dimensions of discourse, the study

analyzes how the concept of “family” is constructed across constitutional texts, legal regulations, educational curricula, media content, and political rhetoric in both countries. The analysis also considers institutional practices (e.g., courts, education policies, media campaigns) through which these discourses are circulated.

Bacchi’s (2009) “What’s the problem represented to be?” approach guided the analysis of legal and policy documents. Following her model, the study investigates the social problem representations underlying these texts—such as fertility decline and work-family balance in France, or moral decay and Western influence in Iran—and reveals the state’s ideological positioning on the family (Bacchi and Goodwin, 2016).

Fairclough’s (2010) three-dimensional model enabled a multilayered analysis of discourses at textual, discursive, and social levels. At the textual level, the study examined linguistic structures, key terms, and rhetorical strategies used in laws and policy documents. For instance, in Iran, the frequent use of terms like “chastity,” “moral responsibility,” and “martyr’s family” was analyzed, while in France, attention was paid to the context in which concepts such as *égalité*, *laïcité*, and *libre choix* (equality, secularism, free choice) were employed. At the level of discursive practice, the research considered which institutions produced these texts and how they were disseminated (e.g., official gazettes, state television, educational directives). Finally, at the level of social practice, the study explored how these discourses relate to broader social structures, especially in terms of the reproduction of gender inequalities or forms of resistance (e.g., Iran’s 2022 “Woman, Life, Freedom” protests).

This methodological framework allows for a multilayered examination of how discourses on family are defined in legal texts, legitimized through institutional practices, and contested or accepted in social reality.

3.1. Data Collection and Sampling

This research is based on both primary and secondary sources. Primary data were derived from institutional documents that reflect the official discourses of the French and Iranian states regarding the family institution. These sources include constitutional and legal texts, policy documents, ministerial reports, speeches by state officials, media broadcasts, and educational materials. Such documents provided a basis for analyzing discursive patterns through which the state defines the concept of “family” and constructs gender norms.

Secondary sources consist of academic publications, reports by international organizations, and assessments by civil society organizations, all of which are discussed in detail in the literature review section. These materials serve a complementary function by contextualizing the findings from primary documents within theoretical frameworks and providing a historical and social background for comparative analysis.

In accordance with the principles of the comparative method, particular attention was given to selecting data from similar categories in both France and Iran. The study examined the legal definitions of the family, current family policy laws, school textbooks, and media discourses in each country, with a focus on laws and regulations enacted within the past decade. This symmetrical sampling strategy was designed to ensure consistency and balance in the comparative analysis.

3.2. Case Selection and Comparative Strategy

The selection of France and Iran for this comparative analysis is grounded in the “most different systems design” (MDSD) approach. This method involves selecting two countries that differ as much as possible in terms of their political, cultural, and legal contexts, with the aim of explaining similarities. It enables the investigation of whether certain institutional patterns can recur independently of

context or reflect broader structural tendencies. France and Iran represent starkly contrasting cases across key parameters: political regime (liberal democracy vs. authoritarian theocracy), religion–state relations (secularism vs. religious integration), legal system (secular law vs. Sharia-based law), and historical-cultural orientation (Europe vs. the Middle East).

This opposition provides an analytical opportunity to reveal both divergences and potential structural similarities in the ideological construction of the family institution. If similar discursive patterns or gender regime structures are observed across such dissimilar contexts, this may indicate broader, trans-regime ideological functions of the family institution. Conversely, marked discursive and institutional differences would underscore the importance of regime type and cultural context in shaping gender norms.

The comparative strategy is structured through both contrastive (highlighting differences) and analogical (examining similarities) approaches. In the first stage, each country was analyzed independently through discourse analysis, and major themes surrounding women, family, and gender roles were identified. In the case of Iran, key themes included: the definition of women primarily through motherhood and spousal roles; the institutionalization of male authority within the family; mechanisms of moral control exercised through the family; and emphasis on population growth. In France, the dominant themes included: support for women as both parents and workers; the constitutional and legal institutionalization of gender equality; the disproportionate burden of care work on women; and the diversification of family structures and the political tensions it generates.

In the second stage, these themes were systematically compared and interpreted along axes of similarity and difference. For instance, how has the theme of “motherhood” been constructed historically in France, and how is it being reshaped in contemporary discourse and practice? Conversely, to what extent is the notion of “women’s participation in public life” represented in Iranian discourse, and what restrictive conditions shape it? Through such questions, the comparative analysis was deepened, not only by examining the presence of discourses, but also by considering their historical transformations and contextual meanings.

3.3. Limitations

This study is subject to certain methodological and contextual limitations. First, there are linguistic and translational constraints. Since most primary sources related to France and Iran are in French and Persian respectively, the discourse analysis relied on accurate translations and academic summaries. However, it is not always possible to fully convey context-specific meanings and cultural connotations of certain terms. For this reason, some key concepts in their original languages (e.g., *laïcité*, *nezafat/iffat*) have been preserved in parentheses throughout the text.

Second, the study primarily focuses on state-centered discourse; the reception, internalization, or rejection of these discourses at the societal level is treated as a secondary concern. This is a deliberate methodological choice. Nevertheless, in order to emphasize that discourse is not a unidirectional (top-down) phenomenon, the *Discussion* section briefly addresses public reactions, alternative discourses, and practices of resistance.

A third limitation concerns the asymmetry of the comparative contexts. Given the significant historical, legal, and cultural differences between France and Iran, it is beyond the scope of a single article to analyze every layer of each case in full depth. Therefore, the analysis has prioritized the most salient aspects of each country’s family ideology, while marginal areas of debate—such as family policy discussions within the Islam–secularism axis in France or family norms among ethnic minorities in Iran—have been excluded from the scope of this study.

Finally, the interpretive nature of discourse analysis inherently carries the risk of researcher bias. The themes and interpretations highlighted in the analysis have inevitably been influenced by the researcher's theoretical positioning. To mitigate and render this influence transparent, all interpretations have been substantiated as much as possible with direct quotations, primary documents, or academic sources, and subjective judgments have been carefully avoided.

4. Comparative Analysis of Family Discourse in France and Iran

This section presents a comparative analysis of state discourses and policy instruments related to the family institution in France and Iran. Grounded in discourse analysis, the examination aims to uncover how ideological meanings attributed to the family, legal regulations, and cultural representations are shaped in each country. The analysis is organized under structured subheadings to enhance the systematic rigor of the comparative method.

The investigation is framed around four key dimensions:

- (1) Official ideology and constitutional discourse on the family,
- (2) Legal framework and the substance of family policies,
- (3) Educational discourse and media representations,
- (4) Social norms and current public debates.

This analytical distinction allows for the deconstruction of how the state constructs meaning around the family across different discursive domains, while also making visible the convergences and divergences in the gender regimes of the two countries. Each subheading begins by describing the country-specific discourses, followed by a comparative evaluation of their historical development, normative content, and social impact.

4.1. Official Ideology and Constitutional Discourse on the Family

In France, family discourse is shaped by the principles of secularism (*laïcité*) and republican citizenship. Although the French Constitution does not explicitly reference the family, the preamble to the 1946 Constitution states that France is a secular, democratic, and social Republic, and that all citizens are entitled to equal rights (Constitution of France, 1946). Within this framework, the state tends to approach the family through an individualist republican lens rather than as an autonomous institutional entity (Prost, 1984: 8).

Nevertheless, historically, the Republic has established a tacit ideological alliance with the family. Since the Third Republic, the "family–nation" relationship has been a central theme in French political rhetoric (Offen, 2000). The family has been portrayed as a unit in which the man is protector and the woman a fertile mother, idealized through pronatalist ideals favoring large families. Post–World War II pronatalist policies reinforced this ideology (Revillard, 2007; Morgan, 2006), positioning the family as both the bearer of national identity and the guarantor of demographic continuity.

Although French secularism formally excludes religious references, it has nonetheless produced an implicit conservatism in terms of gender roles. The figure of the "French mother" exemplifies how women were historically defined not by their presence in the public sphere, but by their role in ensuring national continuity within the private domain (Scott, 2005). Thus, French official discourse, while not religious, long presupposed a patriarchal model of the family.

Beginning in the 1960s, however, social transformations led to fractures in this family ideology. Legal reforms such as women's suffrage (1944), the removal of restrictions on married women's employment (1965), and the abolition of the "head of household" status (1970) reflect this evolution (Scott, 2005). A major shift occurred with the 1999 constitutional amendment, which established

gender equality not merely as an objective but as a constitutional obligation to be actively promoted through public policy.

Consequently, the definition of family diversified: the state began to recognize not only traditional heterosexual marriages but also non-marital partnerships and same-sex families. The principle of *laïcité* was reinterpreted to justify the protection of women's rights as part of the secular mandate (Fernando, 2014). Notably, in the context of headscarf debates, *laïcité* was invoked to legitimize state intervention in the name of women's "liberation" (Bowen, 2008; Scott, 2007), revealing how secular ideology itself can function as a discursive mechanism for regulating women's bodies.

In contrast, in Iran, the family is defined constitutionally and ideologically through patriarchal norms rooted in Islamic law. Article 10 of the 1979 Constitution describes the family as "the foundation of the Islamic society" and mandates the state to protect it in accordance with Islamic principles (Islamic Republic of Iran Constitution, 1979/1989). Article 21 further states that women's rights shall be protected only within the framework of "Islamic criteria," effectively reducing women's subjectivity to their familial roles.

The official ideology of the Islamic Republic frames the family as a strategic domain for the production and preservation of Islamic collective identity (Shahidian, 2002; Paidar, 1995). Through the metaphor of the "fortress," the family is portrayed as the stronghold of moral resistance, and the woman as its protective walls. In the discourses of Ayatollah Khomeini, women are defined primarily through motherhood and chastity, serving the dual cause of Islam and the state (Afary, 2009; Mir-Hosseini, 1999). This rhetoric was part of a broader ideological transformation aimed at reducing women's public visibility and returning them to domestic roles.

The Islamic Republic sought not only to reject Western values but also to break ideologically with the secularizing legacy of the Pahlavi era (Keddie, 2006; Moghissi, 1999). This rupture was evident in family policies as well. Measures such as the mandatory hijab, restrictions on birth control, and the prohibition of abortion constituted direct interventions in personal freedoms but were framed in official discourse as moral obligations to "protect society."

The 2024 Law on the Protection of the Family through the Promotion of the Culture of Chastity and Hijab must be understood within this context. By invoking concepts such as "the establishment of chastity" and "the preservation of the family institution," the law illustrates how constitutional ideology is encoded into legal discourse. The control over women's bodies and family life is not only enacted through practice, but explicitly legitimized at both normative and constitutional levels.

In conclusion, the official ideological approaches to the family in France and Iran diverge sharply: France, under a secular and pluralist model of citizenship, has gradually moved toward a more neutral stance on family matters, while Iran continues to define the family as the cornerstone of Islamic order and imposes a normative model of womanhood. Nonetheless, in both contexts, the family functions not merely as a social unit but as a strategic ideological regulator. In France, this regulation is framed through the discourse of rights and freedoms; in Iran, through the discourse of duties and moral values.

4.2. Legal Framework and Contents of Family Policies

This subsection provides a comparative analysis of how discourses on the family are embedded in legal regulations and public policy in France and Iran. Drawing on Bacchi's (2009) "problem representation" approach, it examines how family policies in each country are legitimized through specific constructions of social problems, and evaluates legal frameworks as extensions of broader discursive structures.

France

Since the second half of the twentieth century, France's legal framework has been progressively stripped of patriarchal norms. In 1965, the requirement for married women to obtain their husband's permission to work was abolished; in 1970, paternal authority was replaced with the gender-neutral concept of "parental authority." The 1975 law enabling consensual divorce marked a symbolic transition toward a family law centered on individual autonomy. Throughout the 1980s and 1990s, the rights of children born out of wedlock were equalized with those of children born within marriage, reflecting the law's adaptation to evolving social realities and an expanded definition of the family (Dekeuwer-Défossez, 2003: 44–46).

A pivotal legal shift occurred with Law No. 2013-404, which legalized same-sex marriage and adoption rights, producing a structural transformation in family law (Legifrance, 2013). Marriage was redefined as a union "between two persons," marking a legal break with heteronormativity. The reform sparked intense public debate: the government framed it as a fulfillment of republican ideals of equality, while conservative groups opposed it as a threat to the "natural family." This conflict illustrates that the law is not merely a technical instrument, but a terrain of ideological contestation.

Alongside civil law, France's social policy regime plays a significant role. Since 1945, family allowances (*allocations familiales*) have been provided to families with children regardless of income, and entitlements such as paid maternity leave and a paternity leave extended to 28 days in 2021 support caregiving responsibilities (Thévenon, 2011; ADEP, 2021). These policies are justified both in terms of gender equality (e.g., women's employment, fathers' caregiving roles) and pronatalist concerns (e.g., the need for population growth).

France is among the countries where women are widely able to combine employment with motherhood. However, feminist scholarship has critiqued this dual-role expectation through the concepts of the "double burden" and the "superwoman" ideal (Fagnani, 2005), revealing the tension between gender equality goals and the demands of social reproduction.

Iran

In Iran, the legal framework was restructured after the 1979 Islamic Revolution based on Sharia principles. The Family Protection Laws of 1967 and 1975 were repealed, and provisions from the 1930s Civil Code were reinstated (Paidar, 1995; Mir-Hosseini, 1999). Men were granted the unilateral right to divorce without cause, and restrictions on polygamy were removed. Custody rights were prioritized for male relatives, and the legal age of marriage for girls remained at 13.

Women's rights in the public sphere are also significantly constrained. The 1983 Penal Code mandated veiling, and in areas such as testimony and inheritance, women are legally valued at half the weight of men. These legal arrangements are underpinned by an ideological framework that legitimizes control over women's bodies and conduct.

In Bacchi's (2009) terms, Iranian discourse does not frame gender inequality as a problem; rather, it constructs women's presence in public life as a threat that "weakens the family". This framing was further solidified by the 2021 Law on the Protection of the Family and Youth Population, which severely restricted access to contraception and abortion, defined population growth as a matter of national security, and promoted large families (ImpactIran, 2024).

The 2024 Law on Chastity and Hijab reinforces this control by directly targeting women's bodies. Arguing that unveiled hair undermines the family institution, the law codifies strict dress norms (CHRI, 2024). These regulations reflect a patriarchal regime that uses family protection discourse to curtail women's visibility and autonomy.

Criminal law also contains provisions shaped by “honor”-based norms. For instance, sentences for “honor killings” committed by fathers or husbands may be reduced (Islamic Penal Code, 2013). The case of Romina Ashrafi illustrates the public outrage provoked by such laws, though legislative reforms have remained limited.

In sum, France and Iran exhibit stark contrasts in their legal frameworks and family policies. While France has expanded its legal definitions in favor of gender equality and family diversity, Iran has reinforced a normative, religion-based family ideology through law. Yet, in both cases, law serves not merely as a regulatory instrument but as a mechanism for shaping society. In France, this process is constructed around egalitarian citizenship norms; in Iran, around religious morality and patriarchal values.

4.3. Educational Discourse and Media Representations

Education and media constitute two primary channels through which the state constructs and reproduces family and gender norms. This section offers a comparative analysis of how these norms are produced and reinforced in France and Iran through these two domains.

France adopts a secular and coeducational system, with republican values occupying a central place in the national curriculum. The education system was secularized at the end of the 19th century through the Jules Ferry laws, effectively removing overt religious references from curricula. Nevertheless, historical accounts show that curricula and instructional materials were not gender-neutral. Until the 1960s, primary school textbooks typically portrayed mothers in domestic roles and fathers in positions of authority and public responsibility (Lelièvre and Lelièvre, 1991). From the 1970s onward, feminist critiques and pedagogical reforms prompted the development of policies addressing gender representation.

In the 1980s, commissions were established to eliminate sexist language, and in the 1990s, the integration of “gender equality education” into national policy became institutionalized (Rogers, 2007; Ministère de l'Éducation nationale, 2015). In 2013–2014, the *ABCD de l'Égalité* program launched pilot initiatives to teach gender equality from an early age, introducing pedagogical activities designed to challenge stereotypes (SBS News, 2014; France Stratégie, 2014). However, conservative backlash against so-called *théorie du genre* led to the program's cancellation; its content was subsequently continued in more subdued forms. Today, themes such as gender equality, anti-homophobia, and family diversity are officially integrated into the curriculum through the *enseignement moral et civique* course (Ministère de l'Éducation nationale, 2015).

In Iran, by contrast, the education system was restructured along religious lines after the 1979 Islamic Revolution. Coeducation was abolished, and curricula were gender-segregated. For girls, the curriculum emphasized domestic preparedness (e.g., “home management,” “family health”), while boys were offered science- and sports-oriented subjects. Textbooks reinforce traditional gender roles: fathers are depicted as breadwinners and mothers as confined to household responsibilities (Moinipour, 2022). The removal of the mother figure from the cover of a primary school mathematics textbook in 2020 sparked public criticism, which officials dismissed as a simplification for aesthetic purposes—though many viewed it as an ideological intervention.

Similar tendencies are observed in textual content: girls' textbooks emphasize themes such as motherhood, chastity, and obedience (Paivandi, 2019; Foroutan, 2021). At the university level, gender-based quotas were implemented in the 1980s, later partially lifted, but reintroduced in the 2010s in some institutions. Justifications often relied on normative discourses regarding “female nature” and appropriate fields of study (Shavarini, 2005; Rezai-Rashti, 2015). These developments show that even higher education is shaped by family-based gender policies.

Media also represent a domain of stark contrast between the two countries. In France, the media operates within a pluralistic and liberal framework. Public broadcasters such as France Télévisions are legally obligated to promote gender equality and combat discrimination in representations of women (CSA, 2021; Vrain, 2015). The growing visibility of feminist perspectives and the institutionalization of the term *fémicide* following the #MeToo movement highlight the media's role in strengthening egalitarian discourses (Zadeyeh, 2021; Gaillard, 2023). Nonetheless, critiques persist—such as the ongoing male dominance among expert commentators (CSA, 2019).

In Iran, by contrast, the media operates largely under state ideological control. State broadcasters like IRIB promote the “Islamic family model,” portraying women as obedient and confined to domestic roles (Nashat, 2021). Divorced women are often subjected to negative stereotypes, and women's aspirations for independence are framed as deviant by the media (Afary, 2022: 11).

In conclusion, both France and Iran use education and media as tools to shape state-sanctioned family and gender norms. However, while in France these tools are increasingly aligned with the institutionalization of egalitarian values, in Iran they serve to reproduce traditional and conservative norms.

4.4. Social Norms and Contemporary Public Debates

In France, family structures have undergone significant transformation over the past half-century. As of 2021, 62.2% of children were born outside of marriage, and by 2023, 23% of children were living in single-parent households (Jacobs, 2023; INSEE, 2025). These figures indicate that the nuclear family no longer constitutes the societal norm and that diversification in family forms has become widespread.

While women's participation in the labor force has increased, gender inequalities in domestic labor persist. Women are responsible for 71% of household chores—a phenomenon described in feminist literature as *persistent patriarchy* (*patriarcat persistant*) (Kandil and Périvier, 2021: 154). To address this imbalance, the state extended paternity leave to 28 days in 2021 and launched public campaigns such as “Sharing is Strength” to encourage men's involvement in caregiving (Lockton, 2021).

In the context of immigrant families, polygamy is prohibited under French law, and individuals maintaining such unions may face revocation of residence permits. The 2019 Law for Gender Equality (*Loi pour l'égalité entre les femmes et les hommes*) includes comprehensive measures aimed at combating forced marriage, virginity testing, and discriminatory practices targeting women's bodies (Arretons Les Violences, n.d.).

Under the principle of *laïcité*, the 2004 law banned conspicuous religious symbols (e.g., headscarves, kippahs) in public schools, and in 2010 a law was enacted prohibiting full-face coverings (burqas and niqabs) in public spaces (Legifrance, 2011; 2020). While officially justified in the name of protecting women's rights and preserving the neutrality of public space, these measures have been criticized by Muslim communities as discriminatory.

In Iran, a growing tension exists between evolving family patterns and the state's normative interventions. Rising divorce rates, delayed marriage, and a declining fertility rate—down to 1.7—have emerged despite state efforts to lower the age of marriage and promote large families (ESCAP, 2023; Povey and Rostami-Povey, 2012).

The increasing educational attainment of women has encouraged their greater participation in public life, creating a structural contradiction with state discourse that positions women primarily in the role of housewives. This tension highlights the conflict between patriarchal norms and educational achievements.

The 2022 uprising symbolized by the slogan “Woman, Life, Freedom” (*Zan, Zendegi, Azadi*) began as a protest against mandatory veiling but quickly evolved into a broader movement demanding women’s right to self-determination (JBI Human Rights, 2023). The movement can be read not only as resistance to religious impositions but also to state control over women’s bodies and the continuity of patriarchal order.

In major cities, alternative practices such as cohabitation without formal marriage have become more common. However, these relationships are not legally recognized in Iran and therefore receive no legal protection. The state seeks to suppress such trends—particularly on university campuses—through gender segregation policies, yet younger generations often devise informal strategies to circumvent these restrictions in their private lives.

The Iranian state’s implementation of a “minimum three children” policy has failed to gain widespread traction. Structural factors such as economic instability, housing shortages, and precarious employment directly influence young couples’ decisions regarding childbearing; many couples choose to have only one child or postpone parenthood altogether (Aloosh, Tabriz and Meysamie 2016; Behjati-Ardakani, Navabakhsh and Hosseini, 2017).

In conclusion, France demonstrates a degree of adaptability, with state discourse evolving in response to changing social norms—albeit with continued efforts to preserve certain traditional aspects of the family institution. In contrast, Iran’s state policies resist societal change, normatively imposing a traditional family model in the face of modernizing individual practices. In both contexts, the family institution is being reshaped along a complex fault line between state intervention and social realities.

5. Comparison and Discussion

This section brings together the comparative findings from France and Iran and situates them within feminist theoretical debates on patriarchy, state power, and gender regimes. This comparative discourse analysis of France and Iran reveals that the ideological function of the family institution is closely intertwined with gender norms. Findings aligned with feminist theory demonstrate that patriarchy is reproduced in both countries, albeit in distinct forms.

Walby’s (1990) distinction between public and private patriarchy is particularly instructive: in France, women live under a regime of legal equality, yet caregiving responsibilities remain disproportionately assigned to them, revealing the persistence of patriarchy in the private sphere. In Iran, patriarchy is not only entrenched in the private domain but also explicitly institutionalized in the public sphere and reinforced through state policies.

In France, the “modified male breadwinner model” (Dang and Monnier, 2011: 2) encourages women to participate simultaneously in the labor market and in motherhood. This dual-role expectation creates a structural “double burden,” echoing Pateman’s (1988) concept of the “patriarchal contract,” wherein women’s controlled participation in the public sphere is contingent upon the continuation of their domestic roles. As Fraser (2016) notes, even under the discourse of equality, care work continues to be socially coded as “women’s work.”

The Iranian case reflects what Hartmann (1981) describes as a structure in which patriarchy is supported by both economic and ideological apparatuses. Women’s participation in public life is restricted by legal, cultural, and economic mechanisms, while family policies institutionalize traditional gender roles. The Civil Code reinforces male authority both normatively and institutionally, and in Connell’s (2005) terms, Iran’s model of masculinity aligns with the state’s religious and patriarchal ideology. In contrast, in France, egalitarian aspirations continue to compete with traditional forms of masculinity.

Through the lens of Foucault's (1990) power-resistance framework, it becomes evident that forms of social resistance emerge in both countries in response to state intervention in family life. In France, conservative backlash against gender equality policies—such as opposition to “gender theory”—signals symbolic struggles over power. In Iran, women develop micro-level resistance strategies, such as rejecting compulsory veiling in everyday life or negotiating marital contracts. These examples illustrate that power is not monolithic but subject to ongoing negotiation and reproduction.

Bacchi's (2009) “What's the problem represented to be?” approach is also illuminating in this context: in both countries, discourses surrounding the family are shaped not only by existing social problems but also by the normative projections of the state. In France, problem representations such as “declining fertility” or “gender inequality” frame the discourse, while in Iran, concerns about “moral decline” or “erosion of women's roles” justify family policies as ideological tools.

Both countries are concerned with declining fertility, but their responses diverge sharply: France seeks to boost birth rates by expanding women's social rights and autonomy, while Iran pursues the same demographic goal by restricting women's freedoms. As highlighted in feminist demographic literature, particularly by McDonald (2000), this contradiction underscores the core finding that women's public autonomy does not undermine fertility; on the contrary, it may support it.

Finally, viewed through Althusser's (2001) theory of ideological state apparatuses, the family operates as a key site of ideological reproduction in both countries. In France, it functions within an egalitarian discourse to regulate women's labor across private and public domains. In Iran, the family serves as a central instrument for reproducing the ideological coherence of the state, grounded in religious and nationalist foundations. When Esping-Andersen's (1990) welfare regime typology is expanded to include a gender dimension, France may be characterized as undergoing a transition toward an “egalitarian conservative” model, while Iran represents a hybrid configuration where patriarchal–neopatrimonial and neoliberal tendencies coexist.

In conclusion, the cases of France and Iran demonstrate that family policies are not merely demographic or economic instruments but also sites of ideological and normative construction. These policies provide critical insights into whether the reproduction of gender regimes is maintained through democratic negotiation or enforced through ideological domination.

6. Conclusion

This study employed a comparative discourse analysis to investigate the role of gender norms in the ideological construction of the family institution, focusing on the cases of France and Iran. The findings reveal that the meanings attributed to the family and the policies implemented around it vary significantly across secular-democratic (France) and religious-authoritarian (Iran) political contexts.

In France, the state discourse seeks to balance the historical legacy of familialism with the principles of gender equality. Family policies have evolved from promoting a singular nuclear family model toward recognizing plural family forms, and legal and social reforms have been undertaken to reinforce gender equality. In contrast, in Iran, the family is positioned at the center of state ideology, grounded in Islamic and patriarchal norms. Women's public rights are restricted, and their roles as mothers and wives are attributed a “sacred” meaning. Recent pronatalist and moral legislation has further entrenched this framework.

Educational and media policies serve opposing functions in the two countries. In France, curricula and public broadcasting formally support gender equality, though social resistance has limited the scope of transformation. In Iran, educational content and state media actively reproduce patriarchal norms by rigidly enforcing traditional gender roles.

These divergent policy orientations reflect broader global polarization in gender regimes. France is developing inclusive and egalitarian policies aligned with human rights norms and social demands, while Iran is reinforcing a conservative model that restricts women's rights and defines the family in narrow ideological terms.

The findings also make significant theoretical contributions. They affirm that the family operates as an ideological state apparatus and plays a central role in reproducing official ideologies. The French case illustrates how family ideology remains a site of historical and political tension even in modern nation-states, while the Iranian case reveals how gender inequality can become a systematic state strategy. Nevertheless, even within the most repressive regimes, social norms remain open to contestation—women and younger generations in particular have demonstrated resistance to state policies.

These findings provide a foundation for policy recommendations aimed at developing gender-equitable family frameworks in both contexts.

Policy Recommendations for France: To fully achieve the goals of gender equality in family policy, France must adopt stronger measures to increase men's participation in domestic responsibilities. These may include extending and mandating paternity leave under a "use it or lose it" scheme, aligning working hours with parental responsibilities, and strengthening gender equality education and media campaigns. Moreover, engaging in sustained dialogue with conservative communities is essential to raise awareness that egalitarian policies do not weaken the family but instead reinforce it.

Policy Recommendations for Iran: Although Iran's current political structure may not permit sweeping reforms in the short term, a long-term transformation strategy is still viable. As a first step, Iran should ratify international agreements such as CEDAW and align domestic laws with these standards. Women's access to education, employment, and public life must be treated as foundational. Family law reforms should raise the legal age of marriage to at least 18 and eliminate practices such as polygamy and unilateral divorce, bringing legislation in line with modern legal norms. While these proposals may appear to contradict the prevailing ideological framework, growing social demands and international pressure could compel the regime to adopt incremental changes.

In conclusion, the relationship between gender norms and the family institution should be understood as a deeply political matter—one that not only affects individual lives but also reflects a society's level of democratization and commitment to human rights. The French and Iranian cases demonstrate that family ideologies are not static; they are redefined in relation to shifting political and economic contexts. The family should not be viewed as merely a private domain or immutable structure, but rather as a dynamic social space where power relations and collective values intersect. In this regard, family policies play a decisive role in shaping a more just and inclusive social order. The steps taken in France, Iran—and globally—will shape the trajectory of future gender regimes and human development.

Statement on Research and Publication Ethics

This study does not require ethics committee approval and has been conducted in accordance with the principles of scientific research and publication ethics.

Authors Contributions

This study was conducted by a single author. All aspects of the research design, analysis, writing, and revision were carried out by the author.

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Extended Summary

This article offers a comprehensive comparative analysis of how the institution of the family is ideologically constructed through gender norms within state discourses in two structurally divergent political systems: secular-democratic France and religious-authoritarian Iran. Anchored in feminist theory and critical discourse analysis, the study interrogates the multifaceted ways in which the state regulates, defines, and legitimizes family structures as instruments of ideological reproduction. It investigates the institutional, legal, educational, and media-based mechanisms through which states enforce gendered visions of citizenship and social order.

Theoretically, the article draws on key concepts from feminist political thought (Pateman, Okin, Fraser), the theory of ideological state apparatuses (Althusser), and discourse theory (Foucault, Fairclough, Bacchi). The family is understood not as a natural or apolitical unit, but as a historically contingent and ideologically saturated site of power. Feminist scholarship has long emphasized that the personal is political, and this research operationalizes that principle by examining how gendered state discourses on the family function to reproduce broader ideological regimes.

Methodologically, the article employs a qualitative, comparative discourse analysis. The core analytical framework combines Foucault's conception of discourse as a knowledge/power nexus, Bacchi's "What's the problem represented to be?" approach for decoding policy texts, and Fairclough's three-dimensional model (textual analysis, discursive practice, social practice). The empirical corpus consists of legal documents, constitutional provisions, public policies, state-authored educational materials, and media content from both France and Iran, with a focus on the period from the 1980s to the 2020s. A symmetrical sampling strategy ensures balanced treatment of both cases across institutional and cultural contexts.

France is analyzed as a secular-republican state that has formally institutionalized gender equality while continuing to negotiate with the legacies of familism and traditional gender norms. The study traces a historical evolution in French family policy—from patriarchal foundations in the Napoleonic Code to egalitarian reforms in the late 20th and early 21st centuries. Legal milestones such as the 1975 divorce reform, the 1999 constitutional amendment on gender equality, and the 2013 legalization of same-sex marriage are interpreted not only as juridical events but as discursive shifts in the state's gender ideology. Nevertheless, despite these advances, France remains entrenched in a "modified male breadwinner" model that reproduces private patriarchy. Public policies, including parental leave and childcare provision, while promoting female labor force participation, have not substantially transformed gendered divisions of domestic labor.

Iran, by contrast, represents a theocratic state where family policy is embedded in Islamic jurisprudence and patriarchal doctrine. Following the 1979 Revolution, the state reoriented family law around Sharia, repealing progressive legislation and instituting gender-differentiated legal norms. Women's rights to divorce, child custody, inheritance, and employment were restructured to reinforce male authority within both public and private spheres. The family is enshrined in the Constitution (Article 10) as the "foundation of the Islamic society," and women's rights are conditioned by "Islamic criteria" (Article 21). The ideological function of the family is further articulated through the state's pronatalist and moral policies, including the 2021 Law on the Protection of the Family and Youth Population and the 2024 Hijab and Chastity Law. These laws underscore a biopolitical strategy wherein the regulation of women's bodies is directly linked to the preservation of religious-national identity.

In the realm of education and media, France has progressively incorporated gender equality into national curricula and public broadcasting standards. The 2013 "ABCD de l'Égalité" initiative and reforms to civic education are emblematic of the state's attempt to challenge gender stereotypes through pedagogical intervention. However, these initiatives have faced conservative backlash,

illustrating that egalitarian discourse remains contested terrain. Meanwhile, French media exhibits both progress and limitations: while it includes feminist voices and recognizes phenomena like *féminicide*, it continues to reflect structural imbalances, particularly in the visibility of women experts and leaders.

In Iran, the education system and media are central to the reproduction of patriarchal norms. Curricula are gender-segregated, and textbooks depict women in domestic roles emphasizing obedience, chastity, and motherhood. State-controlled media reinforces these ideals, marginalizes dissenting voices, and presents alternative family models as threats to national and moral stability. The removal of maternal figures from textbook illustrations and the ideological vetting of university disciplines for women further reveal how gender and knowledge are tightly policed in the Islamic Republic.

The study also explores how family discourse intersects with broader social dynamics. In France, transformations in family forms—such as rising rates of cohabitation, single parenthood, and births outside marriage—have led to policy adaptations that reflect a pluralistic understanding of kinship. Yet persistent inequalities in care work and gendered expectations around motherhood illustrate the endurance of traditional gender regimes beneath progressive legal frameworks. In Iran, resistance to state-imposed gender norms has taken both collective and individual forms. The 2022 “Woman, Life, Freedom” protests, sparked by the death of Mahsa Amini, signaled a broader demand for bodily autonomy and an end to patriarchal governance. Informal practices, such as cohabitation and defiance of dress codes, indicate that the state’s ideological hold is increasingly at odds with the lived realities of younger generations.

By juxtaposing these two cases, the article demonstrates that while France and Iran differ dramatically in regime type, religion-state relations, and legal systems, both utilize the family as a crucial ideological mechanism. In France, the regulation of the family occurs under the discourse of rights and neutrality; in Iran, under the discourse of virtue and divine law. Nevertheless, both contexts reveal that gender equality is not automatically secured by liberalism nor entirely suppressed by authoritarianism—rather, it is negotiated within specific discursive formations and institutional configurations.

The study contributes to feminist political science by offering a theoretically grounded and empirically rich account of how gender regimes are constructed through family discourse. It argues that family policies are not ideologically neutral but deeply political artifacts that reflect and reproduce broader power structures. The family functions as a site of both domination and resistance, as states seek to shape the ideal citizen through gendered scripts of kinship and care.

Key policy implications include the need for France to address the “double burden” on women by expanding structural support for care work and promoting gender-transformative norms among men. For Iran, the article calls for aligning national law with international human rights standards, beginning with the ratification of CEDAW and the revision of family laws that institutionalize gender inequality.

In conclusion, the article affirms that the ideological construction of the family is not incidental but foundational to state power. Gender norms, far from being peripheral, lie at the heart of how modern states define citizenship, moral order, and national identity. Understanding the family through a comparative, discursive, and feminist lens is therefore essential for developing equitable and inclusive social policies in diverse political contexts.