Policing Violence Against Minority Women in Multicultural Societies: "Community" and the Politics of Exclusion[•]

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In an era oriented toward community policing, police face the complex dilemma of respecting differences while enforcing laws in a non-discriminatory fashion. In light of the recent push to criminalize domestic violence, community policing may be particularly problematic in multicultural   societies in which police, reflecting the dominant community ideology, characterize subordinated or minority communities as inherently primitive or violent. To explore these theoretical and pragmatic tensions, the authors examine the gendered meaning of "community" in community policing, and link the new emphasis in policing on local values, multiculturalism, diversity, and cultural sensitivity with the invisibility of gender differences within these minority communities. Drawing on the literature on policing violence against minority women, including their work on Arab women in Israel, they argue that gendered racism and racialized sexism shape victims' and police responses to domestic violence resulting in the culturalization and underpolicing of violence against women in minority communities. The authors recommend that police should seek out non-traditional community leaders and organizations that challenge rather than reinforce myths and stereotypes about minority women and men.

Key Words: policing domestic violence, violence against minority women, culture, feminism, racism, multiculturalism, community policing, Israeli Arab women

Introduction

Within the past decade, feminists have transformed violence against women from an individualized personal problem to a globalized social issue requiring state-based interventions. Transnational bodies such as the Council of Europe have charged their member states to address violence against women. More than 165 nation-states have ratified the United Nations Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW). Since 1992, CEDAW has explicitly obliged its signatories to consider violence against women as a violation of women's human rights. In most democratic states across the globe, the solution to violence against women has been operationalized primarily through the criminalization model. As a result, domestic violence is now under the jurisdiction of the police in various countries. This raises a set of critical questions regarding criminalization and community policing, particularly in multicultural[1] societies.

We raise and address these questions by focusing on the literature on domestic violence and "difference", drawing primarily on our studies of the policing and politics of domestic violence in Israel[2], specifically against Arab women[3]. Given the state's radically diverse and politically polarized population, Israel provides a particularly illustrative, if not extreme, case study of the policing of violence against minority[4] women. As a result, this case study enables us to easily highlight issues that can be found in most heterogeneous communities or nation-states.

At the most general level, we ask how discourses of multiculturalism, diversity, and cultural sensitivity, when combined with prevailing practices of racism and misogyny, shape the masculinist occupation of policing (Miller, 2001). Do multicultural societies protect cultural diversity for all group members, or do they accomplish it at the expense of some segments of the population? When or under what conditions can "cultural sensitivity" become a mechanism of oppression for some members of a minority group? With regard to the criminalization and policing of domestic violence, which community members are protected by police and which are ignored by them and why? Who determines local community needs? Are all communities equally prepared to collaborate and cooperate with police?

Following a presentation of the theoretical framework, we review reasons for which the control of women's behavior, at times enforced through violence, acquires

particular significance in minority communities (whether they are immigrants, indigenous populations, or groups that are culturally or ethnically different from the majority society). We then highlight research conducted on criminal justice system responses in multicultural countries to perpetrators and victims/survivors of violence against minority women. To demonstrate the impact of cultural sensitivity approaches on minority women in contested areas or insular communities, we focus our analysis on a number of themes related to the "culturalization of violence". In light of the centrality of culture and difference to the policing of violence against women, we then query the meaning of "community" in community policing. We conclude with reflections on the tensions between multiculturalism and feminism as they play out in community policing of violence against women and offer directions for rethinking current police approaches or practices.

Multiculturalism and Feminism

Susan Okin Moller, a renowned political science scholar, has recently noted the tensions between feminism and multiculturalism, specifically with regard to multicultural concerns to protect cultural diversity (Okin, 1998). She suggests that efforts to respect minority cultures may sometime clash head on with core tenets of feminism -with the belief that women should have human dignity equal to that of men, that they should not be disadvantaged by their sex. Okin (1998) submits that multiculturalism - the protection of minority cultures or "way of life" not only via individual rights but also via group rights or privileges - may put women at a disadvantage and perpetuate their inequality with men. Because societies and cultures are suffused with gender ideologies and practices, attempts to preserve "authentic" or "traditional" cultural identity often result in the endorsement or even encouragement of discriminatory practices against women and girls (see, also, Okin, 1997, for examples of how multiculturalism may adversely affect minority women[5]).

In line with Okin's (1997) claim, we pose two conflicting views illustrating the tension between feminism and multiculturalism as applied to policing violence against minority women in liberal democratic societies. The first view stipulates that such societies ought to respect the beliefs and acknowledge the needs of its various cultural, racial, ethnic, or religious constituent groups. This view endorses group recognition as a collective aim and promotes the "politics of recognition" (Taylor, 1994), which stresses the importance of appreciating cultural, ethnic, or other group values and needs. The second view calls for recognizing the right of each individual to choose his or her way of life as he or she sees fit. This view espouses the "politics of rights" (Habermas, 1994) or the primacy of individual rights over collective ones. The dilemma is how to reconcile the two approaches in policing violence against

women: how to determine and then acknowledge the collective needs of the group while simultaneously respecting the individual rights of its members. We demonstrate that multicultural approaches envisioned as inclusionary for constituent groups may become exclusionary within groups, in this case, along minority-gender lines. Overemphasizing cultural boundaries or differences may promote particularist justice system responses, ignore resistance by individuals subjected to these responses, and discriminate or oppress minority women.

Members of receiving societies often expect immigrant groups to assimilate upon arrival (see examples in: Volpp, 1996). Similarly, colonizing or occupying societies force indigenous or native communities to abandon their ever-changing ways of life and adapt and conform to the rules of the new regime (Merry, 2000). Although host and colonial intentions are to "civilize," "modernize," or "develop" local communities considered being backward and primitive, these expectations are now considered oppressive (Okin, 1998; 1999). Thus, democratic multicultural countries presently seek to devise new policies that are more responsive to cultural differences, and attempts at being "culturally sensitive" to group variations currently characterize the design of social policy. However, we submit that "culture" is often used as a justification and rationalization for disregarding gender-based oppressions from both within and without the group (Yuval-Davis, 1997).

Democratic societies are expected to identify, accept, and accommodate the cultural needs of diverse citizens with various cultural identities, who are often members of disadvantaged minorities requiring protective legislation and nondiscriminatory law enforcement. A focal concern in this respect is the need to recognize and treat cultural minorities as equal in public policies and institutional responses. The degree to which majority social institutions, including the police, succeed in this task of acknowledging cultural identities remains open for debate, although critical, race, and feminist socio-legal scholars have indicted liberal democratic legal systems for relying on elite white, middle class, masculine standards of needs and rights, falsely presented as neutral in intent, application, and outcome. As a result of this false neutrality, the convergence (Crenshaw, 1991; Yuval-Davis, 1997) of geo-political and socio/politico-cultural ideologies in the lives of minority women can render the policing of violence against women in multicultural societies a form of oppression for individual minority women, families, and collective communities (Websdale, 2001). That women in general and minority women in particular are in a disadvantageous structural position in society is in part demonstrated by differential educational, employment, and income levels (e.g., see Snider, 1998; Collins, 1998). These material, symbolic, and status disadvantages, in turn, create or worsen obstacles to personal and social dignified survival (Guttman, 1994). This is mostly visible in contested areas or when minority-majority community relations are

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particularly hierarchical, strained, in high conflict, or even at war. Hence, the demand for a fair and balanced politics of recognition (Guttman, 1994).

To address these tensions, it is necessary to examine the meaning of "community" and the way group rights, social difference, and gender-related binaries of public/private and active/passive have been constructed to justify differential police responses[6] to violence against women in minority communities. Prevailing police approaches that ignore these concerns are ill suited to address in a culturally sensitive manner the complexity of violence against women, particularly in closed patriarchal minority communities. As we demonstrate, the victimization of minority women, although acknowledged, is often normalized, and in the name of cultural sensitivity, police responsibility for enforcing violence against women laws is at times neutralized or abandoned altogether.

We argue, that to transform multicultural societies into societies that recognize and celebrate diversity in law enforcement practices, the notion of culture has to be examined in all its political complexity and history of fixation and change (e.g.,Yuval-Davis, 1997; Collins, 1998). It is critical to analyze the place of "culture" and "community" not only by how perpetrators justify their violence against women but also by how police explain their differential responses to it. Although some political theories and feminist writings in this area have offered a vision for such transformation (e.g., see Yuval-Davis, 1997, for analysis of diverse women's citizenship), critical examinations in the context of criminal justice or policing have remained sparse (e.g., Bolger, 1991; Daly, 1994; Lucashenko, 1997).

Community Boundaries and Gendered Social Control

Boundaries between majority and minority communities are often marked by rigid distinctions of value between "us" and "them" or insiders and outsiders. One of the ways that many societies accomplish this outcome is to clearly distinguish between "our" superior notions of womanhood (and manhood) and "their" inferior notions thereof. In both secular and religious national cultures, women play the role of biological national reproducers as well as that of cultural transmitters and cultural signifiers of the national collectivity (Yuval-Davis, 1993). Because women are seen as the cultural carriers of the collective - who transmit its beliefs, rituals, and family and community histories - their behavior is subjected to strict monitoring. The proper control of women in terms of marriage, divorce, and sexuality ensures that children who are born to them are within the boundaries of the group not only biologically but also symbolically (Espin, 1998).

This dynamic is particularly visible when groups experience real and/or perceived threats to their collective survival. Thus, gendered social control may be heightened and intensified in times of upheaval, such as migration, colonization, or war. A community's sense of safety and identity depends on a sharp contrast between two sets of cultural values: their own and those of the majority society (Espin, 1998). These two sets are perceived as rigidly different, dissimilar, and unchangeable. The preservation of traditional versions of women's roles becomes central to this sharp contrast (Razack, 1998).

Minority groups often carry concepts of familial, communal, or national honor that are strongly tied to women's virtue[7]. Cultural traditions, colonial hegemonies, and the vicissitudes of historical processes inform the development and perception of female virtue. Definitions of what constitutes appropriate behavior of women are justified in the name of society's prevalent or salient values: nationalism, religion, morality, health, etc. (Yuval-Davis, 1993). This explains why most groups (men and women alike) try to maintain jurisdiction over personal status or family law codes and to control, legislate, and rigorously monitor the behavior of "their" women. This also explains why most endeavors to resist assimilationist policies or the processes of cultural change and to preserve a sense of authentic cultural identity - often orchestrated by traditionalist political or religious patriarchal leadership, and despite much dissent and resistance by indigenous feminists (e.g., Bhabha, 1997; Yuval-Davis, 1994; Volpp, 1996) - focus on restricting women's roles and circumscribing their behavior and sexuality. Retraditionalizing women thus becomes central to preserving national identity and cultural pride (Ahmad, 1992; Narayan, 1997).

Some gender violence scholars theorize that minority, immigrant, and/or indigenous men experience lack of control in their daily life that renders them powerless and unable to perform dominant forms of masculinity. This may result, it is argued, in the desire to exhibit power and control within intimate relationships. In turn, the control of women may become associated with or enhanced as part of "traditional" norms of masculinity. Controlling women's behavior and sexuality may also become a symbol of continuity and orderliness**.** It may provide minority members a comforting sense that not all traditions are lost (Espin, 1998). Minority or immigrant men sometimes express this aspiration by a preference for arranged or intra-ethnic marriages, preempting the risks involved in marrying Western women, or those who have been "corrupted" by Western values (Erez, 2000). Such control tendencies, the research confirms, justify and increase the prospects of violence against women. Similarly, Linda Gordon (1988) explains domestic violence as a set of tactics and strategies that enforce men's entitlement to women's service and sexuality. Men use physical violence not only to establish but also to reinforce this entitlement, particularly when women resist men's coercive control.

While discourses of multiculturalism demand the invention of new social welfare and criminal justice practices, the problem with addressing violence against women in multicultural contexts is that, at the core of all cultures and fundamental to social groups' identities, are conceptions of the "virtuous" woman and related prescriptions concerning the appropriate behavior of females. When employed as a punishment for or as a tool to enforce these behavioral expectations, violence is often considered an acceptable practice. Police have traditionally been hesitant to intervene in acts conducted in what is viewed as a private domain, particularly in minority communities.

Culturalization of Violence Against Minority Women

Minority-majority relationships in multicultural societies or contested states may range from open, friendly, and trusting to distrusting, hostile, or antagonistic. These relations shape residents' and citizens' experiences of and responses to violence as well as their expectations for and interests in police intervention. Majority-minority community relations also influence police perspectives on and response to violence against women. In turn, multicultural discourses affect the way police responses are perceived or experienced by minority group members. Certainly, the quality of majority-minority relations waxes and wanes depending on the political, economic, and social context. Below we draw on our research in Israel where majority-minority relations are particularly antagonistic as well as on research conducted in nation-states that have experienced and continue to experience a wide range or type of majority-minority relations. Currently, nationalism and xenophobia are on the rise in Western Europe, with majority-minority relations growing increasingly hostile. This is also observed in the newly emerging democracies in post-Communist Central and Eastern Europe and in states that maintain communal control over personal status law, such as India, as well as in established democracies with large immigrant or indigenous populations, such the United States and the United Kingdom. These changes in minority-majority relations warrant broad attention to community policing and the culturalization of violence.

Through our review of the relevant literature on violence against minority women, including our own research on violence against Arab women in Israel, we have identified five common themes that center on the culturalization of violence against minority women. Each of these themes illustrates majority culture ideology as reflected in police perspectives and practices.

Violence as cultural attribute: The first theme common to all groups surveyed was how people disregard or fail to acknowledge the place of male domination in their understandings of violence against minority women. In other words, violence against women in minority communities is viewed by the majority as a group or cultural attribute rather than as an expression of male domination. As Volpp (2001, p. 1189) comments,

> We identify sexual violence in immigrants of color and Third World communities as cultural, while failing to recognize the cultural aspects of sexual violence against mainstream white women.

Gender and male domination of women within and across multicultural communities is rendered invisible in the majority analysis, leaving minority women the risk and burden of attacking their culture as a whole to make a personal claim for state protection. Such culturalization of violence is inextricably tied to racism (Razack, 1998) rather than to respect for multiculturalism.

Normalization of violence: The culturalization of violence is linked directly with our second common theme: the normalization of violence. While culturalization of violence temporarily renders invisible men or masculinity from popular understandings of violence against minority women, blaming culture as a whole, the normalization of violence serves to further distance the majority culture from violence within minority communities. The normalization of violence provides members of the majority culture with justification for the prevalence of violence as well as their under policing of it.

When victims and their attackers are of the majority society, for example, or are of the same race or ethnic group, it is commonly assumed that it is gender and not race or ethnicity that determines how the assault is "scripted" (Razack, 1998). Yet, there is cross-cultural evidence to suggest that the judgment by the majority society of intra-group violence against women in minority communities is mediated by the stereotyping of minority cultures and their carriers (e.g., Espin, 1998). Minority communities, often perceived as primitive and prone to violence, are commonly differentially treated by the justice system, including the police, with regard to violence against "their" women. For instance, research in Israel has shown that the majority of Israeli police viewed violence against Arab women as "normal," and related to "Arab mentality" or culture, which views women as commodities (Shalhoub-Kevorkian and Erez, 2002). Research in Australia demonstrates that majority society views Aboriginal manifestations of violence against women as part of their tradition and condoned by "tribal law" (Laster and Raham, 1997; Blagg, 2002). Additional work on immigrants of color to the United States suggest that violence against women is attributed by the majority community to a "culture of

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violence." Each of these explanations enable the marking of the "other" as transgressive without an interrogation of one's own culture.

Research on the role played by police officers' perceptions of minority groups in decision making regarding violence against women has been sparse[8]. Kathleen Ferraro (1989), in her classic study of policing woman battering under mandatory arrest laws, highlights the way perceived cultural attributes serve as reasons, excuses, or justifications to ignore mandatory arrest policies in the southwestern United States, which receives a large immigrant population, primarily from Mexico. For instance, she demonstrates that police tend to dichotomize the community into normal (majority) and deviant (minority) citizens. Normal citizens maintain conventional lifestyle, such as employment, sobriety, family, and modestly clean homes, and are heterosexual, white, and speak English. Deviant or minority citizens, referred to as "Mexican", "Indian" or otherwise "these kinds of people", live an atypical lifestyle. They are publicly intoxicated or high, homeless, involved in crime, live in rundown houses, have an unconventional family structure, and speak foreign languages. Habitual problems, perceived as poor choices, such as addiction, chronic unemployment, and violent behavior, are viewed as endemic to these populations. Although a normal wife beater is considered situationally deviant - his battering is a response to a strain caused by justifiable social stressors (such as a request for divorce) - the battering of minority citizens is viewed as a routine event for "these kind of men." Hence, officers believe that arrest is a waste of time and meaningless in such cases because violence is a way of life for these people or endemic to their culture. Research in Australia (Blagg, 2002) also provides evidence of police downplaying the seriousness of violence against Aboriginal women on the grounds that it is "part of their culture" and they are "used to it." Violence is perceived is a vital part of their otherness and strangeness, making it all too easy for authorities to minimize the severity of the battering or cast aside the suffering of their victims.

Analogous "cultural defenses" often are employed by defense attorneys for sentence mitigation of batterers (e.g., Maguigan, 1995; Volpp, 1994), and police are inclined to accept culturally based attributions of motives as reasons for nonintervention. Yet, unlike defenses in the court, police resorting to culturally based excuses or justifications remain invisible and rarely come to the forefront of public attention. Cultural prejudices and value judgments often determine the extent of blame attributed to minority or immigrant men in judging violence against women. There have been numerous court cases in which minority men attempted to use "cultural defenses" to explain or justify cases of sexual assaults of girls, attempts by fathers to marry off their young or even minor daughters, or honor killing of daughters, wives, or sisters (e.g., Okin, 1997; Volpp, 1994). Appeals for leniency typically include

minority men who were violent with their female partners or family members but
who claimed to have conformed to their cultural dictates. Courts have often accepted
requests for sentence mitigation (e.g., Laster and Raham, 1997; Maguigan, 1995;
Rimonte, 1991; Kelly, 1999).

On the other hand, the few women victims of rape or abuse who have tried to use
cultural arguments to explain nonresistance or compliance with men's demands have
not had their requests granted. Women who claimed that they adhered to cultural
prescriptions when they were not challenging men's authority or orders to comply
have hardly ever convinced criminal justice agents that they were unwilling
participants in their rape or were victims of abuse (Razack, 1998). Furthermore,
women who resisted abuse and acted aggressively as they defended themselves were
viewed as deserving the violence and worthy of a harsher disposition because they
have violated cultural expectations[9].

This differential treatment has led some scholars to note that in violence against
women, legal subjects are recast as a "cultural man" or an "acultural woman"
(Laster and Raham, 1997). A minority man who commits a violent act aligns
himself with his cultural background or history and benefits from it. A minority
woman enacting violence for her defense or as an act of rebellion has no recourse to
cultural precedent or script and consequently must suffer legal and social
recrimination if she resists her own victimization.

While cultural defenses are formally not admissible in court for guilt determination
purposes (they may affect sentence leniency, e.g., Maguigan, 1995), in police
settings, particularly in applying cultural sensitivity through community policing
approaches, they are likely to affect police decisions to intervene. The police may
adopt community standards of acceptable behavior and minimize or tolerate harm
committed by "uncivilized" minority men. Ethnicity (or nationality, race, etc.)
hardly ever absents itself from the battering script, normalizing the abuse and
absolving the abuser from responsibility. The stereotyping of minority men and their
women regulates what is seen and acknowledged by the police, how an incident is
interpreted, and what course of action the police will take. For instance, An Arab
woman in Israel recounted how the officer that came to her house to investigate her
abuse complaint criticized her for not "behaving according to Arab traditions." The
officer chastised her for keeping a dirty house all the while disregarding that her
husband, in his rage, had thrown the food she had prepared for the family all over
the house. The officer also admonished the woman for pushing her husband without
recognizing that the husband had seriously injured her (Shalhoub-Kevorkian and
Erez, 2002.) This severely abused woman concluded that she would never call the
police again, even if her life were at risk. Some police officers expressed sympathy

for Bedouin men accused of violence, suggesting that in their culture men have to marry female relatives, which may explain why they resort to violence (Shalhoub-Kevorkian and Erez, 2000).

Differential reckoning of victims: This normalization of violence categorizes violence against minority women as normal and that against dominant women as deviant, resulting in the differential reckoning of real victims, our third theme. By differential reckoning of victims, we mean to say that police, as part of the dominant society, play a role in determining who constitutes a legitimate and deserving victim and what constitutes a legitimate excuse (i.e., justification) for resorting to violence against women.

In practice, both types of reckoning ostensibly deny the victimization of certain women. They also make it difficult for police to consider in totality the conditions that entrap battered women (Ptacek, 1999). Instead of understanding, for example, that immigrant women may be cut off from the support of extended family and community networks and may experience severe isolation, that they may lack linguistic skills or the right to work, or that immigration laws create legal dependents out of arriving immigrant women, police dismiss the violence women face or consider what they perceive as an "uncooperative" or passive victim as unworthy of their intervention (Abraham, 2000; Erez, 2002). For indigenous women, the impacts of colonization, racism, or "othering" (Said, 1995) present cumulative and overwhelming difficulties, often leading to women, too, considering the violence normal, which in turn increases the grip that minority men have over "their" women (Blagg, 2002; Bolger, 1991; McGillivray and Comasky, 1999) and contributes to police mythologies that minority women neither seek nor deserve protection. The complicity of the dominant majority in the violence (in terms of the marginalization of minorities, differential treatment, etc.) is also forgotten. Gender is taken out of context, as economic, political, historical, and social forces that have weakened minority or indigenous communities are ignored, and conditions that make minority women particularly vulnerable to male dominance by their own and the outside community are overlooked (Volpp, 2001; Blagg, 2002).

A critical issue for the policing of violence against women, however, is that majority group members control the interpretation of what it means to take culture into account. This involves questions such as whether the violence has exceeded what is "normal" or "reasonable" violence for "these kind of people," whether it is outside the parameters of tolerable or expected abuse for minority women, and whether indigenous resistance to woman abuse is in fact a genuine part of the culture. Available studies of policing violence against minority women confirm that such judgments guide police officers' responses to woman battering and influence their

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readiness to enforce the law in minority communities. Research has identified a patriarchal male fraternity and identification between law enforcement officials and minority men whose communities they serve, predisposing police officers to overlook the harm, or question the credibility of abused women's complaints. For instance, Shalhoub-Kevorkian and Erez (2000) report that officers were willing to accept farfetched excuses offered by family members for the violence, and in an effort to resolve the case, would agree to solutions negotiated on behalf of the victim by family members or community representatives. Some officers viewed minority women complainants as exaggerating or even fabricating accusations, while expressing understanding for their men. Laster and Raham (1997) documented how criminal justice agents trivialized injuries inflicted on Aboriginal women when men were perceived as acting within the parameters of their cultural tradition. Sympathy toward patriarchal cultures, together with a conscious or unconscious regard for the impact of marginalization upon minority men, tend to engender tolerance and empathy for minority men in their attempts at "managing" their women (e.g., Okin 1998; 1999).

Thus, police and prosecutors may justify the punishment of violent men to the extent to which women are considered by the majority community worthy of trust and protection (Dobash and Dobash, 1979). For minority women, the bar is often raised higher than it is for their majority counterparts. For minority men, however, expectations for self-control, rationality, and discipline are lower compared with those applied to majority men. For instance, research in Israel (Shalhoub-Kevorkian and Erez 2002) has shown that police expect Arab women to exhibit higher levels of passivity and submissiveness in dealing with male family members or to tolerate more violence in their marital life than their Jewish counterparts. The police also accepted more readily Arab men's excuses for their violent outbursts or turned a blind eye to battering incidents within this community. Police rationalized this behavior with a range of arguments (e.g., that it might be better for the Arab woman if the violation is ignored, that the Arab woman might be killed if her complaint to the police become known, or that the woman would not be able to survive outside her community).

For her own good: Our fourth theme, "for her own good," centers on this rationalization of avoidance strategy. Paralleling the position taken by adults vis-a-vis children, authorities explain that they under police violence against minority women because it is in their (i.e., women's) best interest or for her own good, given her cultural position. Although this may be the result of wayward diversity training, we argue that paternalistic avoidance of duty should not be encouraged as a strategy of cultural sensitivity. That is, unless police intend to bypass the needs and rights of women within minority communities.

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If the police are called for help, officers often become apprehensive about intervening in what is regarded as an internal minority community affair. "Cultural sensitivity" serves as a convenient and institutionally acceptable justification for nonintervention. If the police attempt to intervene on behalf of abused minority women, indecisive, hesitant, or wavering complainants may face pernicious problems. In addition to legal considerations related to pursuing redress without victim statements, the police may soon become unsympathetic to the plight of minority women who retract their complaint or refuse a benevolent offer to "rescue" them from violent partners. Retraction, in turn, reinforces initial police stereotypical beliefs about violence as a routine minority community practice or way of life (Bolger, 1991; Ferraro, 1989). Israeli officers frequently referred to Arab or Bedouin mentality as reasons for not intervening or for making concessions to parties' demands to refrain from arrests, or to the futility of official intervention when violence against women is inherent in this community (Shalhoub-Kevorkian and Erez, 2002).

At the same time, police may avoid responsibility for enforcing the law through a genuine concern for the welfare of the victim. Research on the policing of violence in the Arab community in Israel has identified justifications used by the police to overlook or minimize law violations, including the overall welfare of the victim, her safety, or her prospects to marry. Cost-benefit analysis in which the police weigh these considerations was a common theme in determination of the best response to women in closed communities such as the Arabs in Israel (Shalhoub-Kevorkian and Erez 2002). The question remains as to how police manage these strategy negotiations with individual women and to what extent she is able to "choose" among options.

The double bind of "gendered racism" and "racialized sexism": One of the most complex and insidious themes we identified in the policing of violence against minority women, which raises pragmatic dilemmas for victims as well as police, was the double bind of "gendered racism" and "racialized sexism" (Espin, 1998). Namely, minority women are subjected to a convergence of racism and sexism in the majority society while they also experience sexism and male domination in their own community. This means that while minority women embody an intersection of both gender and community (Crenshaw, 1991), experiences of violence may force them to prioritize or somehow "select" one over the other. More troubling is how women are penalized for making either "choice." When abused minority women attempt to call the police for safety, they find themselves in this double bind. If they expose their battering, their own communities view them as traitors or disloyal sisters for disclosing the violence (Crenshaw, 1991; Erez, 2000). If they bring their

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battering experience to the attention of the police, they risk exacerbating the racism directed at their community - at both minority or immigrant men and women. Fear of reinforcing the dominant group's stereotypes, possibly leading to further racism and discrimination toward the minority group, effectively silences minority abused women (e.g., Crenshaw, 1991; Erez et al., 2003).

Women from minority groups who report abuse are also seen by the majority society as women who have abandoned their communities because they are so patriarchal, backward, or primitive - firm proof of the minority culture's inferiority (e.g., Shalhoub-Kevorkian, 1999). If they do overcome their reluctance to expose the abuse and report the violence, they are vulnerable to familial and communal pressures to withdraw the complaint and may be persuaded to retract their grievances. They may also suffer grave consequences for their attempt to involve outsiders (e.g., Hasan, 1999). The police, on the other hand, as noted above, may readily accept retractions when dealing with closed communities, as they may be genuinely convinced that it is in the abused woman's best interest to forgive and forget.

Police may make minority women, doubly stigmatized by gender and as the "other," feel irrelevant, or not in urgent need for police protection, particularly when the dominant society labels them as a member of the enemy community. For instance, research (Shalhoub-Kevorkian and Erez, 2002) has portrayed the uneasiness and discomfort that abused Arab women in Israel felt in reporting the battering to the police. One abused Arab woman recounted that while waiting to file her complaint, she was criticized by the officer who took her report and identified her as an Arab for her community's recent confrontation with the police. She, as did other interviewees, reported being frustrated and aggravated about having to endure not only their husband's abuse but also the burden of being part of the adversarial "other".

Taken together, these five themes indicate that police practices reflect dominant society's stance on minority communities, with particularly extreme dilemmas found in high-conflict, multicultural societies. The cultural double standards, and consequently under enforcement of the law experienced by minority female victims of intimate violence, have been identified in several studies. Contradictory complaints of under- and over enforcement by the police often plague law enforcement in minority communities.

Community Policing and the Criminalization of Domestic Violence: Whose Community?

With our analysis, we are not suggesting that community policing alone is responsible for the culturalization of violence against minority women, nor are we arguing that traditional forms of policing handle violence against minority women in radically different ways. We are suggesting, however, that community policing, with its emphasis on local community boundaries, understanding and valuing cultural differences, and empowering selected community leaders to prioritize policing needs, may produce unintended consequences in the policing of violence against minority women. For example, community policing may exacerbate already existing harmful policing practices, such as the under policing of violence against minority women. At the same time, community policing also may weaken community initiatives against violence against minority women that are not considered authentically representative of the community. In addition, community policing encourages the development of (professional) relationships between police officers and community members as well as discretionary and interpretive use of rules. This opens up community policing of violence against women to a variety of questions regarding rules and relationships, street-level bureaucracy, and discretionary decision making (Oberweis and Musheno, 2001).

The widespread criminalization and policing of domestic violence coincides chronologically with the rise of the community policing model. Community policing is based on collaboration and police-community partnerships. Developed in the United States, community policing is, in part, a response to police racism and to demands for increased minority community protection. Thus, community policing seeks citizen input, relies on local norms and values, and maintains a limited geographic focus. To correct racist and discriminatory law enforcement, community policing emphasizes cultural competency, acknowledges diversity, and supports the ideal of a "cultural match" between policing philosophy and community values (Wakeling et al., 2001, p. ix). Thus, community policing is often recommended to alleviate tensions between subordinated and dominant communities within multicultural societies.

Community policing, whether focused on the maintenance of public order, the reduction in crime opportunity, and/or social problems, has become the best practices model and leading approach to police reform (e.g., Committee on Multi-Ethnic Community Relations, 1994). Indeed, Herbert (2000, p. 114) has even submitted that "police departments in the Western world can only remain legitimate if they genuflect before the altar of community policing." Given the dramatic increase in U.S. assistance to civilian police forces abroad, including those located

in transitional democracies and failed states (Bayley, 2001), it is critical that scholars, practitioners, and activists situate the criminalization of violence against women within the framework of community policing and the discourses of difference and multiculturalism.

 The criminalization and policing of domestic violence have not escaped criticism. Early critiques of the contemporary criminalization model and the law enforcement approach centered on the patriarchal nature of the law and the unproved ability of legal interventions (e.g., mandatory arrest, orders of protection, incarceration) to protect individual women and their children (Fagan, 1996). Feminist activists, in particular, expressed deep concerns about the ability of the criminal justice system to address the structural conditions that cause domestic violence in the first place (Ferraro, 1996; Snider, 1998). Others anticipated and feared the institutionalization of grassroots women-centered antiviolence movements, warning of the tendency of the state to co-opt efforts aimed at societal transformation and turn them into programs that maintain the *status quo ante* (Matthews, 1994).

In addition to these gender-exclusive critiques of criminalization, minority women, including immigrant and indigenous women, have articulated significant concerns regarding "difference" and the policing of domestic violence in stratified, multicultural societies. Scholars have demonstrated, for example, how differences and contexts, such as poverty (Raphael, 2000), rurality (Websdale, 1998), sexual orientation (Levanthal and Lundy, 1999), immigration (Abraham, 2000; Erez et.al., 2003), racism (Ritchie, 1996), and colonialism (McGillvray and Comasky, 1999; Merry, 2000), matter in women's experiences of and responses to domestic violence. Rural women may not have access to social services as do urban women, for example, and police response time to a remote home may be fatal; lesbian women may threaten to "out" their closeted battered partners; newly arrived immigrant women may think that they are legally dependent on their battering husbands to obtain legal permanent residency. This research also has illustrated how institutional treatment of women victims is influenced by these same differences and contexts.

One pragmatic way minority women have addressed how differences matter to individual and institutional responses to domestic violence is to develop community-based organizations, such as the Asian & Pacific Islander Institute on Domestic Violence, that educate and advocate for members of their community, or to establish shelters that cater to specific communities, such as South Asian immigrant women in the United States or Arab women in Israel. Despite these "specialized" services, however, problems still exist regarding the policing of domestic violence within multicultural societies. Networks, organizations, and shelters may serve local communities, but battered women must still contend with a state-based criminal

justice system that may not provide them safety with dignity. The common lament of those critical of the criminal justice response to violence against minority women is that it may exacerbate minority women's vulnerability to gender violence and their community's vulnerability to state violence through both under policing and over policing. Critical race feminist Adrien Wing refers to this dynamic as "outside/inside violence" (2000, p. 338; see also Atkinson, 1990; 1996; Bhattacharjee, 2001; Boldger, 1991; Coker, 2001; Coomaraswamy, 2001; Crenshaw, 1991; Collins, 1998; Daly, 1994; Critical Resistance/INCITE, 2002; Lucashenko, 1997; Razack, 1998).

Our conceptualization of the dilemmas facing police in multicultural societies builds on and extends this area of writing and activism focused on racialized and/or ethnic majority-minority dynamics in the United States, Australia, Israel or Canada. Specifically, we argued that racialized national minority groups who live in high-conflict, militarized, or contested states present a particular kind of difference that matters to the policing of domestic violence in multicultural societies. For example, their geography of domestic violence (Warrington, 2000) may be more restricted and confined, socially and spatially. Their problems in appealing to the police are compounded by the historical and geopolitical dimensions introduced into the minority-majority community relationships. The dilemmas of the police in addressing violence against these women are intricate and may require an even more delicate balance between "respecting difference" and enforcing state laws in a nondiscriminatory fashion. In assessing community policing and its effects on violence against women, it is important to examine the meaning of the "community," particularly, who constitutes its representatives, leadership, and spokespersons. It is equally important to examine the outcomes of such input and its effect on the welfare of minority women victims of violence.

A casual observation would indicate that the power holders/brokers and those officially representing immigrant or indigenous minority communities rarely include women in their ranks. For instance, in a study of policing domestic violence in the Arab community in Israel (Shalhoub-Kevorkian and Erez, 2002), several officers have observed "immediately following a complaint about wife battering, there is an intensified level of interference by community dignitaries," all of whom are men. Hasan (1999) also provides ample examples of situations in which community notables holding patriarchal values were called on to mediate or help in resolving cases of violence against women. Whether the leadership authority is derived from religious, political, or social bases, community leaders are likely to be men who represent "traditional" views of familial relations and gender obligations. If they include women, these are most likely elderly women recruited to help uphold traditional values and practices (Espin, 1998).

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Yet community leaders, notables, or dignitaries - often called upon when the police seek community input or liaisons with the community - have much impact on police decisions relative to abused women. Community leaders serve as the link between the police and the community, exerting influence on determinations regarding the fate of the victim, her abuser, and their families. The police often rely on notables' judgment about the seriousness of the event, their interpretation of the context, and input about the most effective intervention. One Israeli Arab woman, for example, who was pleased with the comfort and support she received from a female police officer, was disappointed with the police when she discovered that her own and her husband's families, community notables, and the police had reached an agreement that specified that, following an apology from the abuser, she would be returned to him. She reluctantly returned to avoid social exclusion and rejection of herself and her daughters. Another Israeli Arab woman recounted her running away from her abuser only to find out that an agreement between her own family and the police stipulated that any time she leaves, the police would call her family to pick her up and return her to the husband. She stated that her trust in the police had been violated and that she would never call them for help, as "it was better to be buried in my village's earth, than to be buried in a stranger's earth." (Shalhoub-Kervorkian and Erez, 2002). These examples demonstrate how the conservatizing and exclusionary effects of community policing centered on local community values create a welcoming atmosphere for male collusion against victims. As a result, abused minority or immigrant women, caught between the need to escape their abusers and the need to avoid the police, often do not perceive the community leadership as working on their behalf (Narayan, 1997).

Furthermore, police tend to passively ignore indigenous feminist resistance and/or actively critique their support organizations as irrelevant, inauthentic, or "not part of the community." For example, Shalhoub-Kevorkian and Erez (2000) found that Israeli police officers evaluated efforts by Arab women organizations to support abused women and demand strict enforcement of the law against family violence (issuing restraining orders, arresting batterers or using shelters) as "too radical" or not "suitable for this community." Although officers thought that such organizations were "a good start for Arab women," they still considered their activists as "not representing their own community."

Some researchers and activists have suggested that violence against women may serve political ends when majority and minority communities are arranged in hierarchal and contested relations. Governments may provide patriarchal leadership of minority communities with the freedom to resolve violence against women cases according to their "traditions" so that they have at least a perception of autonomy.

According to some scholars, such a move helps to divert minority communities' attention from the discrimination and national oppression they experience as a minority (Hasan, 1999). This parallels the kind of nationalist bargain struck between colonizing or occupying forces with regard to family law codes or personal status laws, in which subordinated communities fight for and/or are presented paternalistically with a slice of control over communal or religious practices, such as marriage and divorce (Adelman 1997; 2000). Others have suggested that the police may use violence against women cases as occasions to improve relations with the minority community or create opportunities for building desired bridges (Shalhoub-Kervorkian and Erez, 2002). Of course, police may also have various ideological, organizational, and resource reasons to succumb to minority communities' pressures to allow them to handle such cases internally, or to resolve them according to their "traditions." A common effect of these distinct interpretations is that national or communal desires for sovereignty, which may be deeply shared by women members of the community, may leave these same women vulnerable to victimization.

From the perspective of the dominant society, concessions to cultural relativism, often echoed by police officers, allow them to distinguish themselves from the primitive "other." Violence against women perpetrated in minority communities, and majority society responses to the violence, serve the interests of both. As Glazer and Raz (1994) in their study of family honor killings in the Arab community in Israel suggest, Israeli Arab men, who take it upon themselves to enforce traditional law by killing women, reaffirm their status and authority within their own community. Their actions also allow them to claim moral superiority over Israeli Jews, who are regarded as having a pale sense of honor and little power because they cannot exert control over "their" women. For Israeli Jews, family honor murders among Israeli Arabs serve as a double affirmation of their superiority. They are proud of their own modern social system that abhors such practices while their system also validates their image of themselves as "tolerant," as they are prepared to make concessions in their dealing with the primitive "other" (e.g., by not interfering when a woman is threatened by family members). Given this hierarchy of meaning and value, some readers may argue that at least this should translate into the proper and safe policing of violence against dominant women. However, feminist sociologists, criminologists, and anthropologists have documented how women members of dominant societies benefit from this "bartering system" of chivalry only insofar as they qualify for and "adhere to proper gender roles" (Belknap, 1996, p. 70 in: Zatz 2000, p. 518, see also: Laster and Raham, 1997; Razack, 1998; Ferraro, 1989).

In closed communities or in conflicted areas, the intervention needed is one that stops abuse and opens pathways to the transformation of masculine subjectivities

and creates possibilities for victims' material empowerment (Coker, 2001), perhaps with minimum interference by the police or the criminal justice system. There is a preference among women from such communities, whether they are Arabs in Israel, immigrants in the United States, or Aboriginal women in Australia or Canada, for strategies that change behavior while maintaining family relations[10]. For many indigenous, minority, or immigrant women, choosing to leave "family" - with all its intricate embedded ties of responsibility and obligation, connection with country, culture, and related support network - is not an option (Blagg, 2002; Erez, 2000). At the same time, it will be important not to treat women in minority communities as monolithic constituents. A group of Aboriginal women in Canada, for example, indicated that they desired an increase in policing of domestic violence whether in conjunction with indigenous practices or in isolation (McGillvray and Comasky, 1999). Police intervention strategies need to respect - rather than problematize - minority women's cultural and family obligations. Yet these obligations should not be used to subject women to abuse and relinquish responsibility for their safety. Thus, culturally sensitive practices, which engage the community in police decision making regarding woman abuse, need to be reexamined in light of questions such as who represents the community, whose interests its input reflects, or from whose viewpoint a particular outcome is desirable. Raising police awareness about cultural differences or ad hoc sensitivity training alone may not be sufficient to transform time-honored ideologies and practices of woman exclusion. In formulating culturally sensitive intervention strategies, the police should search for and activate local resources that support women and adopt a multiplicity of women-centered indigenous solutions.

Community policing, with its emphasis on local knowledge and citizen-state collaboration, may provide a unique opportunity for understanding power struggles and recognizing dissent and resistance to accepted practices that perpetuate gender imbalance (Miller, 1999). A new vision of community policing would recognize dissenting voices and mobilize community resources that support and empower abused women. As cultures are not static but continuously change, violence against women cannot be justified or tolerated based on cultural differences. Nor can culture (or "mentality") be used to neutralize responsibility by those who are policed and those who police. As communities are not monolithic, police should seek out and activate nontraditional community leaders and organizations that challenge rather than reinforce stereotypical beliefs and myths about minority women and men. Cultural sensitivity training for police should provide a bird's-eye view of the community, including its internal resources that support and defend abused women's right for safety, whether these are formal or informal indigenous feminist and human rights organizations, victim assistance grassroots movements, or nongovernmental

organizations. This will result in a complex understanding of life in and across communities.

Conclusion

Using the policing of violence against women as a case study, we have explored tensions between two major approaches to multiculturalism: the politics of rights (Habermas, 1994) and the politics of recognition (Taylor, 1994) and how it results in the politics of exclusion (Collins, 1998). For minority women caught in the net of gender violence, the lure of multiculturalism is considerably reduced. Liberal democracies, committed to principles of equality before the law and to multiculturalism, are particularly susceptible to failed attempts to reconcile these contradictory goals.

Multiculturalism, particularly its corollary - cultural sensitivity - can become a convenient and institutionally acceptable, and perhaps even encouraged, mechanism of culturalizing violence against minority women. Such approaches tend to perpetuate rather than challenge views about the inferiority of "other" cultures, including the portrayal of violence against women as endemic to minority communities. Violence against minority women, although acknowledged, then goes unnoticed, is minimized, or is tacitly accepted. Gender and ethnic/race biases tend to guide and determine routine operations of social control institutions with the blessing of both majority and minority communities. For minority women, the gains accomplished through the "politics of recognition" are easily lost through the "politics of exclusion," as cultural sensitivity practices toward violence against women become a form of police neglect, at best, or oppression, at worst.

In light of our analysis, we suggest that those who study, advocate for, and practice community policing investigate the extent to which community policing serves everyone in communities similarly. Community policing programs must assess whether all members of a particular community are fairly represented in partnerships with police.

The underlying lesson from our research is that in the name of multiculturalism, diversity, and cultural sensitivity, police invoke a concept of "culture" that appears static, is often mythological, and is not necessarily representative of all members of a community or social group. Law enforcement officials with the best intentions may need to understand that the concept of culture is a political one and should be used with caution, particularly when charged with preventing and intervening in violent crimes against minority women in contested states. Failure to recognize and mitigate the suffering of those whose voices are heard least, and whose lives are

often hidden behind closed doors within closed communities, constitutes police failure to grasp their primary role in multicultural societies: to protect and form a partnership of trust with both the men and the women of the community.

Notes

[1]   The use of the term "multiculturalism" or "multicultural" is controversial, and there is no consensus on its meaning or practice. To some it suggests racism, while to others it alludes to efforts to accomplish a monolithic culture. Some black feminist scholars have rejected the term outright, as it locates the problems inherent in multiethnic/racial societies in "culture" rather than racism. It also overly concedes to traditional male community leaders who wish to freeze gender (and often generational) relations, suggesting that there is no dissent from within the community, nor any social change. In this article, we restrict the concept to principles of providing recognition in the form of group rights to minority communities, often expressed in cultural sensitivity approaches, or hiring practices applied in Western democratic societies with multiple ethic, racial, or cultural enclaves.

[2]   We illustrate the challenges of policing violence against women in high-conflict, multicultural societies by drawing primarily although not exclusively on our research in Israel. Over the last decade, violence against women has developed into a recognized social problem in Israel. Feminist activists in Israel began collectively organizing against rape and domestic violence in the mid to late 1970s, with the first shelter for battered women established in Haifa in 1977. Not until 1991 did the Israeli parliament approve the first piece of legislation aimed explicitly at violence in the family; this law permits a battered woman to apply for a restraining order. By 1995, there were six shelters across the state, supported, in part, by government funding. Today, the number of shelters for women and their children has doubled. A growing number of nongovernmental organizations and social service agencies are also staffed by and for Israeli Arab women who are victims of men's violence. In addition, private and public monies support Beit Noam, an innovative residential treatment program for men who batter that provides services in Hebrew. Yet, for all of this activity, in 2001, the Israeli police opened more than 22,000 cases of domestic violence (Ruth Sinai, March 21, 2001. Haaretz English Edition online at http://www.haaretzdaily.com. Last accessed March 21, 2001). At the very least, these numbers document the criminalization of domestic violence in Israel. More important, they indicate that Israeli women are beginning to take their concerns about domestic violence to the police and that the Israeli state is starting to respond to women's demands for safety and protection. However, this overly brief description does not indicate the challenges to policing domestic violence in a high-conflict, multicultural society, which we explore in the text.

[3]   The history of the relationship between Israeli Arabs and the Israeli state contributes to our understanding of the challenges facing police in multicultural societies. At the close of the 1948 war that established the State of Israel, the remaining Palestinian Arab community, formerly under the jurisdiction of the Ottoman Empire and, for a period, under the British Mandate, came under Israeli control. Between 1948 and 1966, these citizens were administered by Israeli military rule. Israeli military rule controlled the economic, social, and political life of this national minority community (Lustick 1980). Although there are direct and overlapping familial, political, and historical connections between them, Arab citizens of Israel can be distinguished from the Palestinians who reside in what is termed "the territories" in the sense that the latter are not citizens of Israel. These territories came under Israel rule after the 1967 war, and part of them have acquired some degree of autonomy as a result of the 1992 Oslo agreement. The status of the territories (including the West Bank, Gaza Strip, Golan Heights, and East Jerusalem) remains a contentious and central focus of Jewish and Arab Israeli everyday life. Israeli Jewish discrimination against Israeli Arabs can be noted

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from state budget allocations to employer hiring practices. Indeed, Israeli Arabs are considered by some Jewish Israelis to constitute a fifth column. Critics argue that the categorization of Israeli Arabs as culturally inferior, alternatively as primitive and pastoral or as cunning and violent, is widespread. In light of the increased politicization and Palestinianization of the Arab sector in Israel, a substantial proportion of Israeli Arabs refer to themselves as Palestinians, Palestinians living in Israel, and/or Palestinian citizens of Israel. Our article deals with Israeli Arabs who are citizens of Israel, that is, those residing legally within the Green Line. The history of military rule, the contested nature of Israeli Arab citizenship in Israel, and the continued violence related to the territories serve as an important context to our argument regarding the policing of violence against women in high-conflict multicultural societies.

[4]   Following Romany (2000), we consider "minority" as a social location of subordination rather than as an indicator of numerical proportion. Minority status can be based on race, ethnicity, religion, or nationality and may result from migration, colonization, or other geo/socio-political arrangements in which countries become multicultural or multiethnic societies. Many of the issues regarding violence against minority women and its policing are shared by all women and are not unique to minority women. The differences are often manifested in degree, extent, formulation, and impact on different women. In this respect, it is also useful to be reminded of Volpp's (2001) caution that to posit feminism and multiculturalism as oppositional is to assume that minority women, presumably disproportionately assaulted by their men, are victims of their cultures. This assumption, Volpp (2001) submits, is achieved by a discursive strategy that constructs gender subordination as integral only to certain cultures. She provides evidence to show that the ubiquitous claim that minority and Third World cultures are more subordinating than Western cultures can be traced to the history of colonialism, the origins of liberalism, depictions of the feminist subject, and the use of binary logic in discourse about violence against women. She also warns against the risks in pitting feminism against multiculturalism: obscuring the influences that shape cultural practices, ignoring the forces besides culture that affect women's lives, and overlooking the way women exercise agency within patriarchy. She joins other critiques of this mode of thinking (e.g., Cohen et al., eds., 1999), reminding us of the high level of violence against women within Western countries such as the United States or England.

[5]   Responding to Okin's provocative question as to whether multiculturalism is bad for women, several scholars (Cohen et al., 1999) have criticized Okin's claim or rejected it outright. Some have contended that Okin's views are rooted in a moral universalism that is blind to cultural difference. Others have quarreled with Okin's focus on gender or argued that we need to exercise care with which group rights should be permitted and not reject the category of group rights altogether. Okin concludes with a rebuttal, clarifying, adjusting, and extending her original position. For our purpose, the response by Homi Bhabha (1997), in particular his arguments regarding cultural defense, is relevant. Bhabha submits that by focusing on cultural defense cases (marriage through capture and rape by Hmong men, wife-murder by immigrants from Asia, family honor killing by people from Middle Eastern countries, or mother-child suicide among Japanese and Chinese provoked by the shame of the husband's infidelity), Okin produces "monolithic," although gender-differentiated, characterizations of minority, migrant cultures. He states that issues related to group rights or cultural defense need to be placed "in the context of the ongoing lives of minorities in the metropolitan cultures of the West if we are to understand the deprivation and discrimination that shape their affective lives, often alienated from the comforts of citizenship." He also challenges the underlying image of minorities as the abject "subjects" of their cultures of origin, who preserve "the orthodoxy of their distinctive cultures in the midst of the great storm of Western progress," a view that ignores the resistance and reform from within minority communities. Because in this article we specifically address violence against women in minority groups that gives rise to such "cultural defenses" and police response to such cases, including thinking modes or reactions that often parallel cultural

defenses, Bhabha's criticism is of less concern for us. See Shalhoub-Kevorkian (1999) for a recent example of the adverse effect of Arab culture on dealing with rape victims.

[6] Differential treatment of minority members, particularly women and children, is not unique to police or to the domain of criminal law, but is also documented in other agencies or occupations (such as social work, counseling) and in the civil law area.

[7] We should note that when we mention minority groups' patriarchal nature or enforcement of conception of the "virtuous woman" we do not mean to suggest that majority societies are not patriarchal or do not subscribe to such conceptions. As Okin (1998) emphasizes, all societies, including the major Western countries on which she draws to provide examples about the tensions between feminism and multiculturalism, are gendered, with substantial differences of power and advantage between men and women. The differences between these countries and the minority groups they absorb, colonize, or with which they otherwise come into contact, and which involve policing, are only a matter of degree. The same applies to minority women's experiences with abuse and social reaction to it compared with other women. The similarity is often more pronounced than the differences, and many of the issues discussed in this article (e.g., privacy, reluctance to report) are present to various degrees in all woman abuse cases (see also endnote 4, above).

[8] The literature on police typification or categorization has dealt mostly with common criminals, such as the "symbolic assailant" (e.g., Skolnick, 1968) or "the asshole" (Van Mannan, 1978). For the most part, it has failed to examine police typification of either woman abusers or cultural minorities.

[9] There have been few cases in various countries in which cultural arguments have been used in high-profile cases by minority women who transgressed. Often the argument held in cases in which the female defendants represented a "conventional" minority woman (e.g., a faithful wife who resisted her husband's violence), whereas in cases in which she did not conform to such expectations (e.g., she was prostituted by the man she killed), her appeal failed (e.g., Rimonte, 1991).

[10] Indeed, most women simply want the violence and coercive control to end; they do not want to sever the relationship.

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