Volume 3, Number 3, September 2026
e- ISSN: 3046-8213

JA RUM
Journal of Analysis Research and Management Review

ROLE AND FUNCTION OF WOMEN IN CONTEMPORARY SAUDI ARABIAN AND IRANIAN SOCIETY: A CRITICAL STUDY

Dr. Showkat Hussain Dar
Associate Professor, DoIS, IUST, Awantipora, J&K

Imza Hassan
Junior Research Fellow, DoIS, IUST, Awantipora, J&K
Corresponding Email: imzahassan192@gmail.com

Abstract

Saudi Arabia and Iran are both governed by Islamic legal systems, yet their approaches to women's roles in society have diverged sharply in the past decade. This study examines how state policy, religion and social change shape the position of women in these two countries today. The research problem centers on a paradox: both nations claim to protect women through religiously grounded law, but their outcomes differ greatly in areas such as employment, mobility, dress and family rights. The objectives are to compare legal reforms, social attitudes and lived experiences of women in Saudi Arabia and Iran and to identify the factors driving convergence or divergence between the two cases. The study uses a qualitative and comparative methodology, drawing on government reports, international human rights organizations, academic journal articles and news sources published between 2015 and 2026.

Findings show that Saudi Arabia has pursued state-led liberalization under Vision 2030: female labor force participation climbed to over 36%, driving bans ended and guardianship rules were partly relaxed though a male guardian is still required for marriage contracts. Iran shows the opposite pattern: women's labor force participation remains below 1% and the 2024 "Chastity and Hijab" law has expanded punishments for dress-code violations, despite widespread public defiance of the hijab mandate since 2022. The study argues that state ideology, not religion alone, explains this divergence.

Keywords: *Women, Saudi Arabia, Iran, Gender Roles, Islamic Law, Feminism, Social Change*

Introduction

The role of women in the Middle East has long been a subject of debate among historians, sociologists and policymakers. This debate is not simply about religion. It also concerns politics, economics and culture, all of which shape how women live, work and participate in public life. Saudi Arabia and Iran are two of the most influential countries in the Muslim world and both apply strict interpretations of Islamic law. Yet in recent years, their paths regarding women's roles have diverged in important ways. This paper examines that divergence and asks what it reveals about the relationship between religion, state power and gender in the modern Middle East.

Historical Position of Women in the Middle East

Scholars agree that the position of women in the Middle East cannot be explained by Islam alone. Long before Islam arrived, societies in the region already had established gender hierarchies. A central insight of Middle Eastern gender historiography is that the subordination

of women predates the advent of Islam by several millennia. Scholar Leila Ahmed demonstrates that patriarchal social systems, professional exclusion, and the symbolic use of veiling to mark social standing took root in ancient Mesopotamia during the fourth millennium BCE. Rather than creating a novel framework of gender inequality, the Islamic tradition absorbed and adapted deeply embedded norms from surrounding Mesopotamian, Persian, Hellenic, and Christian traditions.

This historiographical distinction directly challenges the simplistic assumption that Islamic theology is the sole origin of regional gender disparities. Scholars such as Nikki Keddie emphasize that early Islamic statehood evolved within the context of conquered Near Eastern civilizations. The institutionalization of male authority over marriage, property, and civic participation was primarily driven by the shift from pastoral tribal dynamics to formal state bureaucracies, embedding regional customs into the broader administrative landscape of the pre-modern Middle East.

Over the following centuries, women's roles shifted again under empires such as the Ottomans and the Safavids and later under European colonial influence, which introduced new debates about education, dress and women's place in public versus private life. Historical study of this period particularly in Egypt and Iran shows how women reacted to Western influence in different ways and how later religious revivalist movements reshaped rules on dress, employment and morality. This long history shows that women's status in the region has never been fixed. It has shifted repeatedly in response to political change, economic need and religious reinterpretation.

Understanding the role of women in Muslim-majority societies matters for several reasons. First, women make up roughly half the population, so their participation in the workforce, education and politics has direct consequences for national development. Second, gender policy is often used by governments as a symbol of religious identity or modernization, making women's rights a highly visible marker of broader political direction. Third, Western media commonly present Muslim women as a single and uniform group, when in fact their experiences vary enormously by country, class and generation. A careful, evidence-based study helps correct this oversimplification and gives a more accurate picture of how religion, law and culture interact in practice.

Contemporary Transformations in Saudi Arabia and Iran

In the past decade, Saudi Arabia and Iran have moved in almost opposite directions. Saudi Arabia's Vision 2030 program, launched in 2016, has pursued rapid social and economic liberalization for women. The driving ban ended in 2018, a codified Personal Status Law took effect in 2022 and female labor force participation climbed to over 36%, exceeding the government's original target well ahead of schedule. Guardianship restrictions on marriage remain, but many other legal barriers to women's mobility and employment have been eased.

Iran presents a contrasting picture. Women's labor force participation remains below 1%, one of the lowest rates in the world and the country ranked 143 out of 146 countries in the 2024 Global Gender Gap Report. The 2024 "Chastity and Hijab" law expanded penalties for dress-code violations, including restrictions on employment and education for non-compliant women. Yet public resistance to the mandatory hijab has continued since the death of Mahsa Amini in 2022, with growing numbers of women appearing unveiled despite the risk of punishment.

Comparing Saudi Arabia and Iran is valuable because both countries share a common religious framework, Islamic law, yet apply it through very different political systems: an absolute monarchy pursuing economic diversification in one case and a theocratic republic facing sustained internal protest in the other. This comparison allows the study to separate the effects of religion from the effects of state ideology and governance style, offering insight into what actually drives change in women's status.

Scope and Limitations

This study focuses on the period from approximately 2015 to 2026, using legal reforms, labor statistics and human rights reporting as its main sources of evidence. It does not attempt to represent every regional, tribal or class-based variation within each country, nor does it claim that findings from Saudi Arabia and Iran apply to the wider Muslim world. Data limitations, particularly the underreporting of informal female labor, also mean that some figures should be read as estimates rather than precise measurements.

Statement of the Problem

Saudi Arabia and Iran are both governed by Islamic legal systems and both present themselves in different ways, as defenders of Islamic values and family structure. Despite this shared religious foundation, the two countries have followed markedly different paths regarding women's participation in public life. Saudi Arabia has pursued state-directed reform, expanding women's access to employment, driving, travel and, to a lesser extent, legal autonomy, while still preserving core elements of the male guardianship system. Iran, by contrast, has tightened restrictions on women's dress and public behavior in recent years, even as women's education levels have risen and grassroots resistance to state control has grown more visible. This divergence raises an important question: if both states claim religious legitimacy for their gender policies, why have their outcomes for women differed so sharply? The problem this study addresses is the lack of a systematic, comparative account of how legal frameworks, political ideology, cultural norms and religious interpretation interact to shape women's roles in these two societies. Without such a comparison, existing literature tends to treat each country in isolation, making it difficult to identify which factors are genuinely religious in origin and which are products of specific state policy and political circumstance. This study critically examines the similarities, differences, opportunities and challenges affecting women's roles in both countries, in order to build a clearer and more accurate picture of contemporary gender dynamics in the Islamic Middle East.

Research Methodology

This study adopts a qualitative research approach. A qualitative design is appropriate here because the subject matter, women's roles in society, cannot be reduced to numbers alone. Legal rights, cultural expectations, religious interpretation and lived social experience are all involved and these are best understood through the careful reading, interpretation and comparison of textual and documentary evidence rather than through statistical measurement alone. While the study does draw on some quantitative indicators, such as labor force participation rates and gender gap rankings, these figures are used to support and illustrate qualitative arguments rather than to form the central method of analysis. The qualitative approach allows the researcher to examine not only what laws and policies say, but also how they are applied, interpreted and experienced in practice, which is essential for a topic as socially and politically sensitive as women's status in Saudi Arabia and Iran.

This study employs three complementary methods to examine Saudi Arabia and Iran. The comparative method evaluates both nations side-by-side across key categories like legal status, employment, dress codes and political participation to isolate state governance impacts from shared Islamic law. The analytical method interprets the deeper meaning, political ideologies and practical effects of specific laws and policies. Meanwhile, the descriptive method establishes the essential factual foundation by outlining historical context, legal-political structures and statistical trends prior to analysis.

Literature Review

evaluating the role and function of women in contemporary Saudi Arabia and Iran operates at the intersection of historical socio-legal structures, textual hermeneutics, and state-directed political economy. Scholarly discourse moves beyond monolithic characterizations of

"Islamic women," analyzing how state ideologies, pre-modern institutional structures, and textual interpretations shape female agency, economic participation, and legal rights.

A foundational pillar of Middle Eastern gender historiography is Leila Ahmed's seminal work, Women and Gender in Islam: Historical Roots of a Modern Debate [1]. Ahmed deconstructs the assumption that regional gender inequality originated exclusively in Islamic theology, tracing the institutionalization of female subordination, veiling, and patriarchal control over sexuality back to Mesopotamian city-states between 3500 and 3000 BCE. She demonstrates that these pre-Islamic practices were absorbed across Mediterranean and Near Eastern cultures including Persian, Hellenic, and Christian traditions before being integrated into early Islamic societies. This long historical view shifts scholarly focus from scripture alone to enduring regional socio-economic architectures.

Complementing Ahmed's historical scope, Nikki R. Keddie's Women in the Middle East: Past and Present [2] investigates how the transition from pastoral tribal networks to organized state structures systematically altered women's legal standing. Keddie demonstrates that many laws later associated with orthodox Islamic states originated in pre-Islamic Southwest Asian imperial legal codes. Furthermore, Keddie analyzes how twentieth-century state-building projects in Iran and the broader Middle East impacted female citizenship, showing that both secular state-building and revolutionary clerical regimes used women's bodies and legal rights as central arenas of political contestation.

At the level of textual hermeneutics, scholarship explores how interpretations of sacred texts directly inform legal outcomes. Classical commentators like Ibn Kathir and Al-Qurtubi established that the Quran granted women baseline spiritual equality and property rights, while also prescribing complementary family roles where men maintain financial responsibility. Amina Wadud's *Quran and Woman: Rereading the Sacred Text from a Woman's Perspective* [36] addresses this theological battleground, arguing that classical Quranic exegesis (tafsir) was historically monopolized by male scholars whose interpretations reflected patriarchal biases. Deploying a women-centered hermeneutical method, Wadud seeks to recover the egalitarian ethos of the text, laying the groundwork for modern Islamic feminist movements that argue patriarchal laws stem from historical cultural misinterpretations rather than divine mandates.

This discourse is expanded in research published in Rowaq Arabi [35], which examines Nasr Hamid Abu Zayd's hermeneutical framework. Abu Zayd distinguishes between the universal moral principles of revelation and the historically contingent cultural contexts in which legal rulings were originally framed. This distinction helps explain how traditionalist interpretations continue to be leveraged by state authorities to justify restrictive social codes, whereas reformist scholars seek to disentangle scriptural imperatives from historical patriarchal norms.

In the domain of political economy, Valentine M. Moghadam's *Modernizing Women: Gender and Social Change in the Middle East* [37] highlights the striking paradox of high female educational attainment juxtaposed with low labor force participation in post-revolutionary Iran. In Third World Quarterly, Moghadam [24] further analyzes how international economic sanctions, geopolitical tensions, and restrictive legal frameworks compound women's economic insecurity, restricting their presence in the formal labor market despite high rates of higher education. These economic pressures operate alongside state surveillance; reports by the Center for Human Rights in Iran [27] and Iran HRM [21] detail state tactics designed to enforce mandatory hijab compliance through business raids, financial penalties, and technological monitoring. Historians and sociologists tracing the Iranian women's movement such as Haleh Esfandiari [38] and analysts at the United States Institute of Peace note that despite severe legislative backlash, Iranian women maintain continuous grassroots resistance to demand structural legal reform.

Conversely, recent scholarship on Saudi Arabia documents a state-sponsored shift from structural exclusion to economic integration driven by Vision 2030. Studies in Gender, Work

& Organization by Almohanna [18] examine how Saudi female entrepreneurs navigate legal and social barriers through strategies of "quiet encroachment". Empirical evaluations in the Journal of Development Studies [13] and reports by the Borgen Project [14] measure the economic impact of reforming legal restrictions such as easing male guardianship rules (wilayah), lifting the driving ban, and expanding corporate employment. Political representation has also been tracked through milestones such as the landmark inclusion of women in the Shura Council and municipal elections, with recent analyses by the Arab Gulf States Institute [17] examining ongoing legislative debates over women's roles. However, critical literature cautions against equating state-led modernization with full political liberation, emphasizing that top-down economic integration coexists with the suppression of autonomous feminist activism.

Synthesizing this literature reveals that while Saudi Arabia utilizes top-down state planning to expand women's socio-economic participation to meet national development goals, Iran enforces rigid clerical governance that restricts female public life, prompting sustained grassroots resistance.

Historical Trajectories and Legal Frameworks

Saudi Arabia: Historical accounts describe a state-led, incremental trajectory. Female literacy rose dramatically from 57.28% in 1992 to 99.3% by 2017. Post-2017 legal reforms under Vision 2030 relaxed guardianship constraints allowing women aged 21 and above to obtain passports independently and introduced the country's first codified family law (Personal Status Law of 2022). Scholars characterize these reforms as substantial yet incomplete as male guardianship persists in marriage and family authority.

Iran: Literature frames the 1979 Islamic Revolution as a abrupt reversal of rights previously granted under the pre-revolutionary Family Protection Laws. The post-1979 regime lowered marriage ages, segregated schooling, and expanded polygamy rights. Iranian family law maintains systematic legal inequalities in marriage, divorce, custody and courtroom testimony, recently reinforced by the 2024 Chastity and Hijab Law, which imposes severe economic and social penalties for dress-code violations.

Education vs. Workforce and Political Realities

Economic reforms driven by Vision 2030 triggered a rapid surge in female labor force participation, rising from 17% in 2017 to over 36% by 2024. While women have closed the tertiary education gap and entered diverse sectors (retail, law, security), scholars note that progression into executive leadership and senior academic positions remains limited.

Conversely, Iran exhibits a severe structural mismatch between high educational attainment and low economic integration. Although women comprised 60% of university students and 70% of STEM graduates by the mid-2000s (prompting state quotas to curb female enrollment), female workforce participation remains among the lowest globally at under 14% (2024). Furthermore, despite retaining formal voting rights, Iranian women lack substantive political power, highlighted by the nation's unprecedented expulsion from the UN Commission on the Status of Women in 2022.

Theoretical Framework

To capture the complex interplay of religion, culture, economics and politics shaping women's positions in Saudi Arabia and Iran, this study integrates four complementary theoretical frameworks:

Islamic Feminism: Argues that gender justice is achievable within an Islamic framework by separating core Quranic teachings from patriarchal cultural practices and state interpretations. It provides a lens to evaluate whether restrictions such as Saudi male guardianship or Iranian mandatory dress codes are divine mandates or reinterpretable political choices.

Gender Role Theory: Posits that gender expectations are socially constructed and evolve alongside changing economic, legal and political conditions. It explains how state policies shift societal norms over time, such as the rapid normalization of women in the workforce under Saudi Arabia's Vision 2030 and the widespread acceptance of female higher education in Iran.
Modernization Theory: Proposes that economic growth and industrialization predictably expand women's education, employment and public participation. It aligns with Saudi Arabia's strategy of coupling economic diversification with female workforce integration. Conversely, Iran illustrates the theory's limits, showing how state ideology can block educational modernization from translating into broader social and political freedom.
Feminist Theory: Centers on patriarchal power dynamics, critically evaluating whether legal adjustments genuinely redistribute power or merely alter outward appearances. It pushes the analysis beyond aggregate statistics (such as workforce participation numbers) to interrogate persistent legal inequalities, family authority, and political representation.
By combining these four frameworks, the study avoids single-cause reductionism and systematically evaluates the evidence from complementary angles. Together, these theories provide a robust comparative basis for explaining why two nations sharing a common religious foundation produce starkly different practical outcomes for women.

Women's Position Before Modernization

Before the modern era, women's status across the Middle East was determined primarily by the region's long-standing agrarian and urban economic structures rather than by any single faith. In *Women and Gender in Islam*, historian Leila Ahmed documents how practices such as veiling and strict patriarchal family governance were first institutionalized between 3500 and 3000 BCE during the rise of Mesopotamian city-states. These early urban societies established strict controls over women's autonomy, mobility, and legal status practices that were later reinforced across Persian, Hellenic, and Christian territories. [1]

Recognizing this deep historical legacy is critical, as it disproves the notion that pre-modern restrictions on women originated solely within Islamic doctrine. Building on this perspective, historian Nikki Keddie observes that many socio-legal customs later integrated into Islamic governance were adopted from the conquered pre-Islamic empires of Southwest Asia. [2] As early Islamic empires transitioned from tribal confederations to centralized state administrations, these pre-existing administrative and social hierarchies were formalized, establishing a domestic, household-centered life for women across religious lines until the twentieth century.

Arabian society, the direct historical setting for what later became Saudi Arabia, followed this broader regional pattern but developed its own distinct customs. Scholarship on pre-Islamic Arabia, referred to in Islamic historiography as the *Jahiliyyah*, describes women's position as generally subordinate, treated in many respects as objects rather than full legal persons and vulnerable to practices Islamic teaching later prohibited or restricted. [3]

Following the rise of Islam and the eventual formation of the modern Saudi state in 1932, women's public role remained tightly restricted for decades, reinforced by a strict interpretation of religious law and by tribal custom. Formal education for women was not introduced by the state until 1959, through the creation of the General Presidency for Girls' Education and this initiative faced early resistance rooted in traditional interpretations of Islamic norms that favored informal, home-based learning over public schooling. [4] Literacy among Saudi women remained extremely low well into the twentieth century, with the national female literacy rate standing at only 57.28% as late as 1992, illustrating how slowly formal educational access expanded even after girls' schools were officially established. Gender segregation in schools, workplaces and most public spaces became a defining and long-lasting feature of Saudi social organization, one that would only begin to visibly loosen with the reform agenda that emerged after 2016.

Iran's historical trajectory before 1979 followed a markedly different path from Saudi Arabia's, shaped by a period of state-driven secular modernization under the Pahlavi monarchy. Education for both girls and boys was made free and when Tehran University opened in 1936, it admitted both men and women from the start. [5] In 1963, women gained the right to vote and to run for parliament and the Family Protection Law gave women the right to petition for divorce and to gain child custody, ending a husband's unilateral power to divorce his wife or automatically claim custody of the children; the same law also raised the legal marriage age for girls from 13 to 18. [5]

By the eve of the revolution, these reforms had produced a level of formal participation that would not be matched again in Iran for decades. By 1978, two million women were part of the workforce, including more than 146,000 in the civil service. [5] This pre-revolutionary record is important for the comparative aims of this study because it shows that many of the changes occurred post 1979, political representation, divorce rights, custody rights and workplace participation, had already been established in Iranian law before the Islamic Republic came to power, distinguishing Iran's history from Saudi Arabia's more linear, incremental pattern of reform.

Islamic Perspectives on Women's Roles

Because both Saudi Arabia and Iran ground their legal systems in Islamic law, understanding how Islamic scholarship itself approaches women's roles is essential background for the chapters that follow. Contemporary Islamic scholarship is far from unified on this question. Classical commentators such as Ibn Kathir and Al-Qurtubi have emphasized that the Quran established women's spiritual equality with men, granting rights to inheritance, property ownership, and consent in marriage that were largely absent in pre-Islamic Arabia, while also describing complementary family roles in which men bear primary financial responsibility. [6]

At the same time, more traditional scholarship has produced stricter readings of women's roles. Scholars such as Ibn Baz and Ibn Uthaymeen, associated with a more conservative strand of Islamic jurisprudence, have tended to interpret women's rights by relying closely on the explicit textual evidence found in the Quran and Sunnah, generally supporting more restrictive positions on women's public roles. By contrast, a distinct scholarly movement has emerged that seeks to reinterpret the same texts toward greater gender equality. Scholars including Amina Wadud, Asma Barlas, and Fatima Mernissi have argued that traditional Quranic exegesis was conducted predominantly by male scholars whose interpretations reflected their own experiences and biases and have proposed a women-centered method of interpretation intended to recover aspects of the text that support gender justice but have historically been overlooked. [7]

This scholarly disagreement is directly relevant to the present study, since it shows that Islamic teaching itself does not dictate a single, fixed model of women's roles. Contemporary analysis of Islamic legal discourse frames the central challenge as distinguishing cultural norms that have become historically associated with Islam from principles that are genuinely rooted in scripture, a distinction that remains contested among scholars and activists alike. This unresolved debate helps explain why two states that both claim Islamic legitimacy have produced such different legal and social outcomes for women, as each nation draws upon different scholarly traditions to justify its particular model of women's role in society.

Women in Contemporary Saudi Arabia

The Saudi family remains organized around a patriarchal and extended-household model in which male relatives (fathers, husbands and brothers), held formal authority over major life decisions affecting women. This structure has not disappeared, but it has been gradually reshaped by legal reform, urbanization and rising female education, which have together

increased women's influence within the household even where formal male authority persists on paper.

Likewise, Marriage in Saudi Arabia continues to be governed by religiously grounded family law and it remains the area of social life where reform has moved most cautiously. The 2022 Personal Status Law still requires a male guardian to contract a woman into marriage and fathers remain the default legal guardians of children even in cases where mothers hold custody. [8] Under the 2022 law and its 2025 regulations, women may request a transfer of guardianship if their current guardian is negligent and courts may dissolve a marriage where a wife demonstrates sufficient harm, sometimes with reduced obligation to return the dowry. [9] Custody rules also now favor mothers for children under two years of age, even if the mother remarries, marking a modest shift from earlier practice.

The male guardianship system, long the central legal mechanism constraining Saudi women's autonomy, has been substantially, though not fully, dismantled. A 2019 royal decree amended the Travel Documents Law and the Civil Status Law, allowing women aged 21 and above to apply for passports without a male guardian's permission and extended the under-21 guardian requirement equally to men and women. [8] Parallel reforms to passport and civil status regulations removed the need for guardian approval in registering births and other civil matters. Despite these changes, guardianship still governs key life decisions, especially marriage and divorce and deep-rooted restrictions persist alongside continuing institutional concerns, including the unresolved legal status of marital rape.[9]

Beyond family law, everyday social restrictions have loosened considerably since 2017. Women can now obtain passports, drive, work across most industries, own property and participate in elections, representing a significant expansion of personal freedom compared to the pre-2017 period.

- **Education**

Literacy gains among Saudi women over the past three decades have been dramatic. Women's literacy rose from 57.28% in 1992 to 99.3% by 2017, essentially closing the historic gender gap in basic literacy within a single generation. Female participation in tertiary education has expanded even more sharply. At its peak in 2006, a 20 percentage-point gender gap favored women in tertiary enrolment, narrowing to five points by 2022, with some data suggesting the gap had closed entirely by 2024.[10] Female gross tertiary enrolment reached a value of 63.40 compared to 40.83 for males in recent measurement, putting Saudi Arabia on track toward gender parity in higher education.[11] However, gender disparities persist in academic staffing and leadership: the share of women among university academic staff rose only from 13% in 1975 to 43% in 2022 and women remain rare in senior university leadership posts.

Women's presence in science, technology, engineering and mathematics fields has grown but remains uneven. Women make up 22% of enrolees in STEM bachelor's programs, with over 150,000 female students in these fields as of recent data, a figure Vision 2030 initiatives aim to expand further.[12]

- **Employment**

Female labor force participation has risen faster in Saudi Arabia than in almost any other country over the past decade. Participation climbed to over 36% by 2024, up from roughly 17 % in 2017, surpassing the original Vision 2030 target of 30% well ahead of schedule. An independent study using synthetic control methods estimated that Saudi Arabia's 2017–2021 legal reforms produced a nearly nine percentage-point increase in female labor force participation, bringing over one million additional women into the workforce within three years. [13]

Women's participation in business ownership has also expanded. Today, 23.2% of Saudi women participate in early-stage startup activity, placing the Kingdom among the top-ranked countries globally on this measure. Government programs have supported this growth;

Monsha'at, the Kingdom's SME authority, provides grants, training and business development support specifically for women entrepreneurs. [14] Women now work across retail, hospitality, entertainment, manufacturing, legal practice, security services and government administration, sectors that were previously closed to them or practically inaccessible, supported by labour law amendments strengthening maternity leave and mandating childcare provision in larger workplaces. Nonetheless, women entrepreneurs continue to face difficulty securing financing and persistent gender stereotypes affect how investors and funders assess their credibility.[15]

- **Political Participation**

Saudi women's formal entry into political life began at the local level. Women voted and ran as candidates in municipal council elections for the first time on December 12, 2015. Roughly 130,637 women registered to vote, compared with more than 1.3 million men and Saudi women won 20 of approximately 2,100 contested municipal seats. Salma bint Hizab al-Oteibi became the first female elected official in the country's history as a result of these elections. [16]

In January 2013, King Abdullah appointed 30 women to the 150-member Shura Council, the kingdom's top advisory body, guaranteeing that women hold at least one-fifth of the council's seats, following consultation with religious leaders. In 2013, three women were named deputy chairpersons of Shura Council committees covering human rights, information and culture and health affairs, marking early substantive roles beyond simple membership. [17]

- **Legal Rights**

The six-decade ban on women driving ended in June 2018, removing a long-standing practical barrier to women's mobility and employment. In August 2019, guardianship laws restricting women's freedom of movement were formally relaxed, granting women the right to travel and choose their place of residence without male guardian approval. [13]

Challenges

Some Saudi women, including educated ones who support traditional gender roles, view the loosening of restrictions on driving and mixed-gender work as an unwelcome import of Westernized ideas that threatens Islamic values, complicating any simple narrative of universal support for reform. Research on Saudi hiring managers finds that personal opinions and perceptions of women's suitability for particular tasks, rather than tangible operational costs, are the strongest predictors of whether firms employ women, suggesting workplace inclusion depends heavily on individual managerial attitudes. [18]

Similarly, occupational stereotyping persists even where legal barriers have been removed: certain fields, such as carpentry, mechanics and construction are still widely regarded as unsuitable for women and some entrepreneurs report resistance from within their own families when entering non-traditional business sectors.

Women in Contemporary Iran

- **Social Status**

Family life in Iran is governed by a legal system that grants men primary authority over major household decisions. This authority extends across marriage, travel and in many cases, a wife's ability to work outside the home. A married woman may not obtain a passport or travel outside the country without the written permission of her husband, a restriction that continues to shape women's daily autonomy within the household. [19]

Likewise, Marriage law in Iran has changed only modestly since the 1979 revolution, despite decades of activism. The Islamic Republic initially lowered the legal marriage age for girls to nine years old; parliament raised it to 13 in 2002 and the judiciary has since blocked further efforts to raise the age higher. Despite the legal minimum, many marriages of girls to grown men continue to occur in practice. [18] Divorce law also remains asymmetrical: a woman can only obtain a divorce through a court order from a judge, while a man can obtain one simply by declaring it verbally.

Cultural expectations in Iran continue to emphasize women's roles as wives and mothers, reinforced by both state messaging and religious authority, even as rising education levels have pushed many women toward professional aspirations that conflict with these traditional expectations. Islamic jurisprudence, as applied in Iran, grants men guardianship over women and reduces women's agency in both familial and broader societal matters, a principle that continues to shape everyday cultural expectations of women's proper role. [20]

The 2024 "Chastity and Hijab" law grants enforcement agents broad discretionary power over vague concepts such as "improper dress," with sanctions ranging from warnings and fines to denial of public services, restrictions on employment and education and criminal prosecution for repeated violations. [21] Implementation of harsher hijab penalties was scheduled to begin in December 2024 but was paused by the Pezeshkian administration and remained pending through 2025, even as widespread public defiance of the hijab mandate continued. [22]

- **Education**

Iranian women's educational advancement stands in sharp contrast to their more limited public and economic roles. Female university enrolment rose from 33% before the revolution to 60% by 2012, with women comprising over half of all university students and 70 percent of science and engineering students by 2006. Iranian women have dominated university enrolment for roughly the past fifteen years, a fact that runs counter to common outside stereotypes of Iranian women as confined to the home. [23]

Despite this dominance in enrolment, women's professional education has periodically faced deliberate state restriction. A report from the Majlis Research Center warned that Iran's high female enrolment could cause social and economic imbalance between men and women and in 2012 thirty-six universities excluded women from 77 fields of study as part of a quota policy. This pattern illustrates a recurring feature of Iranian educational policy: expansion of access followed by periodic conservative pushback once female participation appears to threaten established gender roles.

- **Employment**

Iranian women's presence in professional and public-sector employment remains limited relative to their educational attainment. Despite considerable achievements in higher education, only about 17% of Iranian women have been able to secure employment, reflecting a stark mismatch between educational success and labor market outcomes. [23] Their entrepreneurial activity is also constrained by legal and financial barriers rooted in family law. Iran's Civil Code permits a girl as young as 13 to marry, yet the legal age to conduct banking affairs, including securing a loan, is 18, a contradiction that a prominent Iranian women's rights lawyer has described as a form of economic violence affecting young affecting young women by restricting their financial independence and trapping them in legal limbo regarding marriage loans and asset management. [24]

- **Political Participation**

Formal political rights for Iranian women have existed since before the revolution, but substantive representation remains low. Women have never held more than 5.8 % of Iranian parliamentary seats (17 out of 290), the highest share achieved since the 1979 revolution and women remain barred from the presidency and largely excluded from key government positions.[24] Women's participation in local councils has grown gradually but remains a small share of overall candidates. In the 2017 local elections, 17,885 of 287,425 registered candidates nationwide were women, representing 6.3% of all candidates, a modest increase from 5.4% in 2013. In Tehran specifically, six women were elected to the city council in 2017, doubling the number of women councillors compared to previous rounds, with candidates campaigning on issues including women's civic engagement, employment, education and public safety. [25]

Comparative Analysis

The comparison suggests that political system and state ideology, more than religion itself, account for most of the divergence observed.

1. Islamic Feminism: Textual Reinterpretation vs. State Codification

Islamic Feminism serves as a vital analytical lens to determine whether state-enforced restrictions on women stem from immutable divine mandates or reinterpretable political choices.

- **Saudi Arabia:** Historically, Saudi Arabia codified strict Wahhabi interpretations of Sharia, most notably manifested in the comprehensive male guardianship system (*wilayah*). Under recent state directives (such as *Vision 2030*), the monarchy has decoupled core Islamic principles from these long-standing patriarchal cultural traditions. By dismantling key legal components of *wilayah* and lifting restrictions like the driving ban, the Saudi state has functionally demonstrated the core thesis of islamic feminism: that many public restrictions were historically contingent, reinterpretable policy choices rather than unalterable scriptural imperatives.
- **Iran:** Following the 1979 Islamic Revolution, the Iranian state institutionalized a specific, clerical reading of Shia jurisprudence that mandated female dress codes (*hijab*) and enforced restrictive family laws. While Iranian reformists and Islamic feminists have consistently deployed hermeneutical arguments to separate Quranic egalitarian ethics from state-enforced patriarchal laws, the theocratic state continues to reject reinterpretation, treating mandatory dress codes and family codes as non-negotiable pillars of Islamic legitimacy.

2. Gender Role Theory: State-Led Engineering vs. Cultural Resistance

Gender Role Theory explains how social expectations surrounding women are socially constructed and evolve when economic, legal, and political conditions shift.

- **Saudi Arabia:** The kingdom demonstrates rapid, state-led gender role re-engineering. Driven by top-down legislative decrees, societal norms regarding women's public visibility and professional presence have shifted remarkably fast. Activities that were socially restricted a decade ago such as women working in retail, corporate positions, and public management have undergone rapid normalization under *Vision 2030* as state policies purposefully recast gender expectations.
- **Iran:** In Iran, the evolution of gender roles presents a bottom-up, society-driven paradigm. State ideology initially attempted to restrict women to domestic and maternal roles; however, changing socioeconomic realities fostered widespread social acceptance of female higher education, leading to women constituting the majority of university graduates. This evolution in gender role expectations has occurred in direct tension with state ideology, creating a friction where society expects female autonomy while the legal structure attempts to enforce traditional subordination.

3. Modernization Theory: Linear Integration vs. Ideological Containment

Modernization Theory posits that economic diversification, urban development, and industrialization predictably expand women's access to education, formal employment, and public life.

- **Saudi Arabia:** The Saudi trajectory closely aligns with classical Modernization Theory. The state's economic imperative to transition away from oil dependency (*Vision 2030*) required mobilizing all human capital. Consequently, economic growth strategies have been explicitly paired with female workforce integration and educational expansion, leading to measurable structural absorption of women into the formal labor market.

- **Iran:** Iran illustrates the explicit limits of Modernization Theory. Despite high levels of urban development and exceptional female educational attainment, state-imposed ideological barriers, restrictive family laws, and economic sanctions have prevented educational advancement from converting into broader economic and social freedoms. This structural bottleneck leaves female labor force participation stagnating at low levels (around 17%), showing that state ideology can actively block the linear progress predicted by modernization models.

4. Feminist Theory: Co-opted Modernity vs. Persistent Patriarchal Power

Feminist Theory centers on patriarchal power dynamics, critically evaluating whether legal modifications genuinely redistribute authority or merely alter the state's outward appearance while leaving core power structures intact.

- **Saudi Arabia:** Applying a critical feminist lens reveals that while aggregate economic statistics show dramatic improvements, patriarchal power dynamics remain centralized. Gender reforms have been implemented top-down to serve state-led economic modernization, yet political representation remains strictly controlled and autonomous grassroots feminist activism remains heavily circumscribed. Thus, legal reforms expand female public utility without fundamentally relinquishing state control over civil society.
- **Iran:** Feminist theory exposes how Iran's legal system maintains patriarchal authority within the domestic unit and the state. Legal codes governing marriage, divorce, inheritance, and financial transactions preserve male authority over female family members. However, this institutionalized patriarchal power has generated sustained, grassroots female resistance, where women continually contest state surveillance, bodily control, and legal disenfranchisement.

Conclusion

This study set out to compare the roles of women in contemporary Saudi Arabia and Iran, two Islamic states that share a common religious foundation yet have produced strikingly different outcomes for their female populations. The findings support the central argument of this paper: that state ideology and policy choice, rather than religious doctrine alone, are the primary forces shaping women's status in these societies.

Major Similarities: Despite their differences, the two countries share several important features. Both ground their legal systems in Islamic law and invoke religious legitimacy to justify their approach to gender. In both countries, women's educational attainment has expanded dramatically, in some measures surpassing that of men, showing that access to schooling has been one of the more consistent areas of progress across both societies. Family law remains the area of greatest resistance to reform in both countries: guardianship, unequal divorce rights and male authority over marriage persist in Saudi Arabia and Iran alike, suggesting that this domain is treated by both states as closest to core religious identity and therefore hardest to change. Finally, both countries show a persistent gap between women's formal rights or qualifications and their actual social and economic power, a gap visible in Saudi Arabia's underrepresentation of women in senior leadership and in Iran's low female labor force participation despite high educational attainment.

Major Differences: The two countries diverge sharply in direction and pace of change. Saudi Arabia has pursued rapid, state-led liberalization since 2016, expanding women's employment, mobility and legal autonomy as part of a deliberate national economic strategy. Iran, by contrast, has moved toward greater restriction in recent years, most visibly through intensified enforcement of mandatory dress codes, even as women's education and, at times, local political

representation have grown. Political systems also differ fundamentally: Saudi Arabia's monarchy directs reform from above with limited public pressure, while Iran's Islamic Republic reflects an ongoing contest between elected reformist impulses and unelected clerical authority.

Role of Religion: This study finds that religion functions less as a fixed determinant of women's status and more as a framework that different states interpret to serve different political purposes. The same Islamic legal tradition has supported both Saudi Arabia's recent liberalization and Iran's recent tightening of restrictions, confirming that religious text is compatible with a range of policy outcomes and that the crucial variable is which interpretation a government chooses to enforce and why.

Looking ahead, Saudi Arabia's reform trajectory appears likely to continue, driven by ongoing economic diversification needs, though family law and leadership representation are likely to remain areas of slower change. Iran's future is harder to predict: persistent public resistance to hijab enforcement, combined with generational shifts in attitudes and continued economic pressure from sanctions, suggests unresolved tension that could produce either further restriction or eventual relaxation, depending on political developments that remain uncertain. In both countries, the direction of change will likely continue to depend more on political decision-making than on any change in religious doctrine itself.

Recommendations

Based on the findings of this study, the following recommendations are proposed:

- Both governments should expand women's presence in decision-making bodies beyond advisory or symbolic roles, ensuring that policies affecting women are shaped with meaningful input from women themselves.
- Educational systems in both countries should build on existing enrollment gains by expanding access to fields and career paths that translate directly into employment and leadership opportunities, rather than access alone.
- Governments and financial institutions should expand access to credit, business licensing and mentorship for women entrepreneurs, addressing the financing and cultural barriers identified in both national contexts.
- Public legal literacy programs should help women understand their existing rights under family law, labor law and civil status regulations, since many barriers persist not only in law but in limited public awareness of what current law actually permits.
- Continued academic and religious engagement with differing interpretations of Islamic texts can help distinguish genuine doctrinal requirements from cultural tradition, supporting policy debates grounded in informed religious scholarship rather than assumption.

REFERENCES

[1] L. Ahmed, *Women and Gender in Islam: Historical Roots of a Modern Debate*. New Haven, CT, USA: Yale Univ. Press, 1992.

[2] N. R. Keddie, “Introduction: Issues in Studying Middle Eastern Women’s History,” in *Women in the Middle East: Past and Present*. Princeton, NJ, USA: Princeton Univ. Press, 2007.

[3] A. Musta’id, “The Position of Women in Islamic History,” *Journal of Islamic History and Manuscript*, vol. 2, no. 1, May 2023.

[4] S. B. Zaki, “Arab Women Before and After Islam: Opening the Door of Pre-Islamic Arabian History,” *New Age Islam*, May 9, 2016.

[5] H. Esfandiari, “The Women’s Movement,” *The Iran Primer*, United States Institute of

Peace, Mar. 17, 2016.
[6] "Woman in Islam: Status, Rights and Role in the Quran," *Quran Gallery*, Jan. 22, 2026.
[7] "Women's Rights in Islam: A Comprehensive Analysis," *International Journal for Multidisciplinary Research*, 2025.
[8] LegalClarity, "Saudi Arabia Women's Rights: Current Laws and Restrictions," 2026.
[9] LawGratis, "Woman Laws at Saudi Arabia," Apr. 21, 2025.
[10] UNESCO, "Saudi Arabia," *Global Education Monitoring Report*, Mar. 24, 2026.
[11] "Gender Equality at Public Universities in Saudi Arabia," *Journal of Educational and Social Research*.
[12] LegalClarity, "Women's Rights in Saudi Arabia: Laws, Reforms and Limits," Jun. 6, 2026.
[13] Reforming Gender Laws: The Economic Impact for Women in Saudi Arabia," *Journal of Development Studies*, Taylor & Francis, Dec. 21, 2025.
[14] Borgen Project, "Women Entrepreneurs in Saudi Arabia: Economic Empowerment," Mar. 9, 2025.
[15] Vision2030.ai Encyclopedia, "Female Employment in Saudi Arabia," Apr. 18, 2026.
[16] UN Women, "UN Women Statement on the Municipal Elections in Saudi Arabia," Dec. 18, 2015.
[17] Arab Gulf States Institute (AGSI), "All the King's Women: New Shura Council Members Stir Gender Debate," Jan. 24, 2025.
[18] A. Almohanna, "Quiet Encroachment and Female Entrepreneurship in Saudi Arabia: An Intersectionality Plus Approach," *Gender, Work & Organization*, Sep. 5, 2025.
[19] Human Rights Watch, *World Report 2020: Iran*, Jan. 14, 2020.
[20] Stimson Center, "Iran Under Fire Amid New Restrictions on Women's Rights," Nov. 8, 2023.
[21] Iran HRM, "Annual Report on Human Rights Violations in Iran in 2025," 2026.
[22] Freedom House, "Iran: Freedom in the World 2026 Country Report," 2026.
[23] openDemocracy, "Iran's City and Village Council Elections and Women's Political Participation," Apr. 22, 2026.
[24] V. M. Moghadam, "The Gendered Politics of Iran-U.S. Relations: Sanctions, the JCPOA, and Women's Security," *Third World Quarterly*, vol. 45, no. 7, pp. 1199–1218, 2024, doi: 10.1080/01436597.2024.2314005.
[25] Global Voices, "What Do Election Results Signal About Women's Political Participation in Iran?," Jul. 27, 2017.
[26] Al Jazeera, "Saudi Women Take Seats in Shura Council," Feb. 19, 2013. [Online]. Available: https://www.aljazeera.com/news/2013/2/19/saudi-women-take-seats-in-shura-council.
[27] Center for Human Rights in Iran, "Iran's New Tactics to Crush Mandatory Hijab Resistance: Business Raids and Surveillance," Oct. 15, 2025. [Online]. Available: https://iranhumanrights.org/2025/10/irans-new-tactics-to-crush-hijab-resistance-business-raids-and-surveillance/.
[28] Grokipedia, "Women's Education in Saudi Arabia," Jan. 13, 2026.
[29] Human Rights Watch, "Saudi Arabia: Landmark Elections for Women," Dec. 11, 2015.
[30] Human Rights Watch, *World Report 2025: Iran*, Jan. 16, 2025.
[31] IntechOpen, "Joining the Workforce, Saudi Women and Vision 2030," Jan. 7, 2025. [Online]. Available: https://www.intechopen.com/chapters/1196624.
[32] Iran Primer, "Part 1: Phases of the Women's Movement," United States Institute of Peace, Aug. 11, 2020.
[33] Middle East Research and Information Project (MERIP), "Women and Gender in the Middle East," Jul. 29, 2025.
[34] Revolutions in History, "Backlash and Barriers: The Regressing Female Rights in Iran," Oct. 20, 2025.

[35] Rowaq Arabi, “Islam and Women’s Rights: Abu Zayd’s Hermeneutical Reading of the Quran,” Cairo Institute for Human Rights Studies, Sep. 10, 2024.
[36] A. Wadud, *Quran and Woman: Rereading the Sacred Text from a Woman’s Perspective*. New York, NY, USA: Oxford Univ. Press, 1999.
[37] V. M. Moghadam, *Modernizing Women: Gender and Social Change in the Middle East*. Boulder, CO, USA: Lynne Rienner Publishers, 2013.
[38] H. Esfandiari, “The Women’s Movement,” *Frontline*, Oct. 27, 2010. Cited in University of Arizona Center for Middle Eastern Studies teaching materials.