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DIMENSIONS OF PUBLIC DEBATE ON SEXUAL VIOLENCE AGAINST WOMEN: SIMILARITIES AND DIFFERENCES BETWEEN GREECE AND EU POLICY FRAMING¹

ABSTRACT

This article aims at a critical analysis of Greek public discourse concerning various forms of sexual violence, as presented mainly in Parliamentary discussions, but also in the press where politicians and activists debate the issue. Using the Mageeq methodology and analysed documents, the objective is to investigate the way in which various social actors define gender and make it apparent (or not) within the respective discourse, as well as to examine the framing of specific issues of sexual violence (intra-family violence and trafficking). An additional objective is to highlight the differences and similarities in the conceptualisation of these forms of sexual violence between EU policy texts and the Greek case.

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1. Many thanks are due to the people that made this paper possible: to Professor Maro Pantelidou Malouta for her support and guidance; to Maria Filiopoulou for her invaluable contribution during the analysis stage; to Anna Nikolaou for her generous help during the translation of the Greek material; and, last but not least, to the whole MAGEEQ group for their good will and the offering of creative ideas and information. It should be added that references to and discussion of the European material are essentially a report of the work of the respective national research groups and the MAGEEQ team as a whole.

INTRODUCTION²

This paper provides an analysis of the issue of sexuality and violence against women at the level of political discourse, as expressed in official or quasi-official texts and debates around relevant public action programs and legislative measures. Mainly an analysis of Greek policy frames in respect to gender-based violence, it attempts also a comparison with respective frames at EU level. It is the product of two years' research and dialogue among the team members of the MAGEEQ project in an effort to identify the *policy frames* that are present in various gender policies across Europe. It was hoped that the analysis of relevant public documents along these lines will contribute both to our better understanding of frame analysis as a tool for studying policy implementation problems, as well as of the ideologies and social structures that sustain these problems.³ The main objective of this EU-supported project was to investigate the existence of different policy frames under the hypothesis that policy frames contribute to the variety and differentiation in the implementation of gender mainstreaming in different countries. In this context, we thought it would be highly relevant to compare, for our particular subject of interest, namely sexual violence, the policy frames detected in EU discourse, on the one hand, and in that of Greek officials and significant actors, on the other.

Regarding sexuality, the reference to which is of paramount importance in any gender related problematique, and in particular the attention that issues of sexual and gender-based violence receive the last five years in Greece, there are initially two crucial questions to be addressed. The first is related to whether there is visible, widespread indigenous social demand for legislative and other measures related to these issues. The answer to this question should certainly be negative although there is a number of social and political networks and voluntary groups that are active occasionally in order to sensitise public opinion and promote solutions on a political level. Nevertheless, as an initial reaction, one cannot help but notice how narrow is the field of sexuality issues in Greece on the basis of the demands raised

2. For this article 3 reports that were produced in the context of the MAGEEQ research program were used as references: M. Bustelo, T. Dombos, M. Filiopoulou, A. Hadjiyanni, F. Kamoutsi, A. Krizsan, R. Platero, K. Tertinegg, J. Van Beveren, M. Verloo, 2005; M. Paantjens, 2004, F. Kamoutsi, M. Filiopoulou, 2004.

3. For the MAGEEQ project and frame analysis as theory and method, see M. Verloo, this volume.

within it. The second question, which is more difficult to answer, refers to the ways in which the issues of gender-based violence are raised from time to time on different levels and whether there are any apparent biases favouring specific issues. For example, there are quite noticeable levels of sexual harassment at the workplace, but most of the time public attention is directed to the issue of child abuse, as evidenced by media coverage. Another inconsistency worth mentioning is the rapidly growing welfare system for the support of victims of sexual violence and abuse and at the same time the absence of a comprehensive policy-oriented debate. The previous example is probably indicative of the inconsistency in the definitions of sexual violence given by different agents, leading to different classifications of the problem. The second may indicate the importance of external factors, such as the existence of EU funds for certain purposes, funds that guide the formation and implementation of policies despite the absence of mass social demand.

Given the centrality of issues related to sexuality within a gender problematic, we think that in spite of the scarcity of relative material, and of the one-sidedness of the little that is available, it is worthwhile to make the best of what is available in order to study the specific character of policy frames. We even think that in this field, subtexts referring to gender inequality could be particularly interesting, because sexuality is the least problematised of the areas of our study on the political level, in which «common sense» ideas and preconceptions are least doubted.

Discourse on sexuality in Greece since the turn of the century remains still marked under the strong influence of the Greek feminist movement of the 1970s and the 1980s. On the other hand, dominant social perceptions on sexuality remain traditional, thus, profoundly sexist, backward and demeaning for women. Initially we must clarify the fact that sexuality cannot be treated as an issue highly debated and with high media visibility in the same way as «immigration» or «pension policies» are. It is definitely an important issue in terms of its centrality in a gender problematic, and as far as Greek society is concerned, because it expresses in privileged ways its deep-rooted patriarchal and sexist values. Thus, as such, it deserves special attention within the framework of the present study. Nevertheless, sexuality issues are almost always disguised on the agenda of public interest and debate under certain, only, of its dimensions that occasionally receive attention. On the other hand, aspects of the issue of sexuality have managed to remain hot in public interest and debate in the media, despite their sporadic appearance and/or reappearance on official agendas. This may reflect fluctuations in social tolerance that tantalize Greek society in its

transition from tradition to modernity, offering thus, a valuable criterion and measurement of change in social attitudes, values and perceptions.

An initial identification of the important issues on sexuality, as evidenced by the Parliament Debates Archive suggests that recent public debates are spearheaded by legislative policies or government action plans that either aim at implementing the constitutional demand for the «equality of sexes» at every aspect of social life, or reflect the direct or indirect implementation of relevant EU regulations and directives in reference to gender mainstreaming. However, the proposed measures enjoy public attention and media coverage, regardless of whether they are finally accepted or rejected, which reflects specific characteristics of the Greek socio-cultural milieu. In fact, they mostly refer to and highlight issues of sexual violence rather than sexuality, thus the particular character of the subject matter and the balance of issues in the discussion that follows.

At the EU level, while issues of gender-based violence occasionally appeared on the agenda of the European Parliament in 1980's and a «resolution on violence against women» was voted in 1986, it was only after the 1995 Beijing Conference that specific programs were promoted. In this context domestic violence is sometimes treated separately and sometimes as one of the forms of violence against women.⁴

THE GREEK BACKGROUND

The only aspect of «sexuality» and particularly of sexual violence, that has a long history as an area of legislative intervention in Greece is rape. In Greek law, rape was perceived and treated for many years as a crime against the *property* of a man. Thus to rape a woman equated to rob her father or husband of her value by rendering her unchaste. From a socio-cultural perspective, the treatment of rape as an assault to a man's property is connected to deep-rooted cultural values of «virginity» and chastity of women and the prominence of these values within Greek society. In formal legal terms, however, rape was defined as a crime against morals.

After 1974, the social and cultural dimensions of rape in Greece were addressed for the first time by the feminist movement. The basic objective of the Feminist Movement was to challenge the mainstream conviction that rape was a solitary and exceptional phenomenon related to psycho-

4. See Krizsan, Paantjens, van Lamoen, this volume.

pathological attributes of certain men and instead to underline that violence against women was an inherent element in many social and cultural practices. Thus the focus of the feminist approach was to define rape as the product of a deep-rooted *institutionalised sexism* rather than a phenomenon attributed to psychopathological factors or to delinquent sub-cultures.

From 1980 to 1983, when many reforms on family legislation and social policies that favoured the improvement of women's status, took place, there was a dynamic re-emergence of feminist demands and mobilisations aiming at activating public sentiment on the issues of sexual violence and rape. At the same time there was a growing number of mobilisations of feminist activists that took on the initiative to denounce rapists in public. A new legislation, where rape was redefined as a crime against sexual freedom replacing the previous «crime against morals», was thus promoted.

The provisions of the respective law on rape, 1419/1984, became part of the chapter about crimes against sexual freedom and crimes against the economic exploitation of sexual life. Rape, that used to be defined as the coercion of a woman to illicit (extra-marital) intercourse by physical violence or threat of a severe and immediate danger, has been now merged with coercion to assault and is defined as coercion of another person to illicit intercourse or attempt of assaulting action by physical violence or threat of a severe and immediate danger. If the perpetrators are more than one, the action is considered as a more serious crime. The insult of sexual dignity by assaulting actions was now determined as a special crime. If this insult is addressed to a child under 12 years of age, it is punished more severely. However, rape within marriage still does not constitute a crime.

Lastly, in relation to the offence of harassment at the workplace or at any other place, Greek Law provides protection to women through general provisions scattered among the Civil or the Penal Code or in some more specific laws on other subjects. Statements on the issue of sexual harassment at workplace are also found in the regulations of the National Collective Labour Agreement of 1993, where employers and workers agreed «for the decent treatment and behaviour in the working places» on issues related to gender as well as to the protection of the personality. However, the juridical decisions that have dealt with incidents of sexual harassment are very rare.

To conclude, law 1419/84 as finally voted –with the most essential change that rape cease to be a «crime against morals» and be characterized as a crime against sexual freedom– did not face the issues raised in a radical manner, according to the demands of the feminist movement.

A common attitude in the face of acts of sexual violence is «tolerance» –by both the social and the family environment– based on the view that violence within the family or a sexual relationship should be considered a private matter. While research on these matters is fairly limited, there are two reports that are quite informative of the situation: the Committee 1 which organised the 1998 conference «Zero Tolerance» (governmental action) to male violence against women has recorded incidents of violence between June and November of that same year, through articles in the Press, uncovering only a small percentage of family and work-place violence on the one hand, and sexual exploitation of foreign women on the other. The second report, which is also interesting, is the one by SOS3 help line, run on a voluntary basis for eight years by a feminist group. In this report, several cases of abuse, ranging from psychological extortion to rape and battering, were noted. Most of them were within marriage.

Rape and sexual harassment in the family is getting quite a lot of media coverage especially when the victim is a child or teenager. There are also incidents of sexual exploitation of children that are covered by the media. The role of the media regarding the issue of violence against women is, of course, of great importance. However, while the existence of violence is made public, it is also much distorted especially in «reality shows» on television: the use of violence is not actually denounced as an issue and, in fact, it is not discussed at all: the discussion is confined to commonplace ethical remarks and sensationalism without the expression of clear or official opinions. It is noteworthy that an initial examination of the proceedings of the Greek parliament since 1997 shows only two statements on the issue of rape in marriage, one on sexual harassment in the workplace and a few on the issue of domestic violence. However, at the same time there are many comments on the issue of violence against and sexual exploitation of children. Most of the debates were made during the proceedings for the legislation of new measures against sexual exploitation and trafficking. On the other hand, there is a growing number of references to domestic violence and incidents of rape in Greek newspapers indicating an increasing concern of the public. There are also a few Internet sites run by feminist groups involved in on-line campaigns for those issues.

This relative paucity of material is quite notable since Greece, according to reports of a European Committee, is ranking in 1999 very high on the list concerning cases of domestic violence (31%, while the EU mean is 19,1%).

It is of course to be expected that rape and other forms of violence against women are more widespread as well as more hidden, in those societies where the patriarchal character is more pronounced and less challenged.

Main Laws and Parliamentary Discussions of the period (1997-2003)

Although domestic violence is well recognized and reported as a social problem in Greece according to evidence given by the NGO's and newspaper reports, it still remains a «common secret» well kept within Greek families. It is often noted with concern, that there is no specific legislation for domestic violence, which would take into account the marital and the inter-familial relationships. On the other hand there are certain attempts to incorporate EU directives, mainly after 1999 when the General Secretariat for Equality initiated the establishment of an Inter-Ministerial Committee in order «to design and implement law and policy to repress violence against women». All in all, the official texts produced since then by the General Secretariat for Equality, are densely punctuated with suggestions for policy actions and campaigns to sensitise the public on the issue of violence against women within the family (e.g. «Break the silence» campaign). According to official sources the long delay in putting the issue forward with specific legislative acts, is attributed to «the lack of political commitment by the various ministries involved, and the division of competencies between them that makes coordination difficult» (Greek Helsinki Report, 2002). We could add here as supportive evidence on the legislators' hesitation to treat domestic violence separately, the exclusion of marital rape from the articles 336 and 338 of the penal code, although this was reformed lately with the explicit wish to assert gender equality in terms of the victims' gender (both women and men are now referred as potential victims of rape and sexual exploitation).

Given this context, a critical frame analysis in the Greek case should, refer to sexual violence in general instead of just domestic violence, in order to have a richer material and be more productive. Furthermore, in terms of policy frames the parliamentary discussions on trafficking seem very fertile for the analysis, since these debates allow for a variety of meanings to be expressed.

Law 3064/02 on Trafficking

In 1999, the Committee on the Elimination of Discrimination Against Women noted in its Concluding Observations on the Second and Third

Periodic Reports of Greece, that insufficient attention was given to the possible links between the lack of law enforcement and trafficking in and migration of women. The Committee recommended that *«compliance with the regulations governing prostitution be monitored effectively and adequate measures to address trafficking in women be introduced»*. In May 2001, the Committee against Torture (CAT) recommended that Greece should take steps *«to prevent and punish trafficking of women and other forms of violence against women»*.

The U.S. State Department report released in June 2002 gave Greece the lowest rating possible, for failing to combat trafficking and protect victims. According to this report, Greece *«does not fully comply with minimum standards for the elimination of trafficking and is not making significant efforts to do so»*.

In March 2002, the Human Rights Observatory released a commentary on Greece's draft anti-trafficking legislation, urging members of the Greek parliament to strengthen the draft law on human trafficking to protect victims and punish corrupt public officials implicated in the trade. The National Committee for Human Rights has also released a commentary of the draft law with similar remarks. One can easily understand then, that the government's determination to re-examine the existing legislation on the issue of crimes of sexual exploitation and to prefigure the provisions of protection to victims of these actions came under the pressure of demands for compliance. Thus, it is not surprising that most of the argumentation on the importance of legislating is focused on Greece's obligations towards the international community. But, whatever the incentives, it is important that this debate gave rise to a number of questions addressed by the media and NGOs, concerning the numbers of trafficked persons in Greece and the insufficiency of the new law in matters of the victims' protection. Also, the respective debate is very rich in underlining perceptions that define policy frames in respect to sexual violence, hence of interest to us.

As far as NGOs are concerned, there were a number of reactions. Their main critics with regard to the draft law, referred to Article 12, concerning help and care services provision to trafficking victims, which provides for the future issuance of a Presidential Decree that will deal with the details of implementing the services provision. This was considered insufficient, since it seemed imperative, given the crucial situation, that detailed provisions on the implementation of services for trafficking victims were provided for in the text of the law, rather than as a promise of some future presidential decree.

POLICY FRAMES ON DOMESTIC VIOLENCE / SEXUAL VIOLENCE IN GREEK PUBLIC DEBATES

In order to identify frames, in the sense of knowledge that structures our understanding of reality and influences the political confrontation of domestic violence, we selected a number of public documents that reflect views on and perceptions of the issue and cover a wide social and political spectrum. Moreover, the selection process was especially designed to ensure the equal representation of men and women speakers and authors.⁵

It should be noted, that although the frames detected, as systematic and all-embracing conceptual schemata, seem to be comparable in terms of significance, in reality they are considerably dissimilar as to their political impact. As already noted, in Greece, public debates on issues of sexual violence are relatively new; therefore, the material of the period under study (1997-2003) was quite thin compared to that of other countries. Consequently, the relative lack of empirical evidence (or small amount of texts) made difficult an elaborated analysis of frames. The process of organizing and standardizing the fragmented and basically ideological elements and policy proposals in Greece was influenced by the cross-reading and parallel examination of a richer material in the other European countries, which has proved to be very useful in the context of the comparative analysis.

In the following sections, which focus on the Greek case, we present frame analysis in two levels: the level of diagnosis and the level of prognosis. It should be noted that the presentation of frames that follows, does not necessarily imply their hierarchy, neither their mutual exclusion. Frames can co-occur, and indeed they often do: For example, the framing of gender-based violence that has the highest occurrence in the diagnosis of the problem is by far the one that refers to its public dimension. This frame however, coexists with other frames that tint it with a more conservative (sexist) or a more critical dimension, depending on whether the issue is

5. Thus, we analysed the following texts: a) Parliamentary debates on Bill 3064/02 entitled: «Fighting trafficking and crimes against sexual freedom, pornography of the under-aged, economic exploitation of sexual life and supporting the victims of these actions» that took place in October 2002. Newspaper articles on domestic violence; b) Papers from the European experts' conference on domestic violence and trafficking that was organized by the General Secretariat for Equality in May 2003; c) The speech of the Minister of the Interior on the international day for combating violence against women, November 2002; d) A leaflet on domestic violence by the General Secretariat for Equality in November 2002.

viewed as being one of «degradation of morals», or of gender inequality. This co-occurrence of frames is also noted in the prognosis of the problem.

Frames in the analysis of the nature and causes of the problem in Greece (Diagnostic Frames)

Public matter frame (Public dimension of the problem of domestic violence)

According to this frame, which has the highest occurrence in the diagnosis of the problem, violence against women is considered an issue of public responsibility and refers to the organization of citizenship since violence threatens the institutions of democracy. In that sense, violence is not a private problem, even though it may be tackled as such by the State, but a public issue that requires state intervention. It is the State's responsibility to take action in order to help and protect the victims of violence as well as to punish the perpetrators.

This frame is based on humanist values, as most documents suggest that violence against women is a violation of human rights, human dignity and sexual freedom. A number of texts add another dimension to this frame namely the inefficiency of the public services to deal with the problem: the Government, in this view, does not exhibit political determination and does not act in time. Moreover, existing laws have major shortcomings and, therefore, considered as ineffective. Finally, the obligations of the state to recognize and confront all forms of violence against women as a public problem as well as adjust national legislation to the new realities stem from the external pressure the country is facing particularly from the EU. This frame appears as dominant, since all speakers, regardless of their specific political stance, refer to the public dimension of the problem, albeit diverging in the points stressed.

Deteriorating society frame (Violence against women is an expression of social decay)

The second frame represents violence as a problem that extends to the entire society and is seen essentially as a problem of the distortion and degradation of morals that strikes at the heart of the value system of family and society, with negative effects on social cohesion, social consciousness and solidarity. This is attributed to «the sexual revolution and the emancipation of women» –as the roles of men and women have changed– holding, in effect, women responsible for the violence against them. There is also, in this case, particular reference to pornography that reproduces

stereotypes of violence against women related to essentialist notions of male aggressiveness and to the development of deviant sexual behaviour. Such views are commonly found in the speeches of male, especially conservative, but also liberal MPs.

Gender inequality causality frame (Gender structural inequalities are the sources of violence)

In this frame, domestic violence is seen, first of all, as an expression of male dominance and gender inequality. It is viewed as part of a larger problem that is framed in terms of dominance, dependency or power and exploitation. It can also be more generally framed as «hegemonic power of men» which is considered to be the real obstacle to gender equality. The causes mentioned are male dominance, dependency of women, unequal power relations, gender roles and gender stereotypes, traditional values, men's aggressiveness, patriarchy as well as the lack of commitment to combat gender violence. Thus, this particular frame focuses on the relationship between sexual exploitation, domestic violence and gender inequality and is mainly found in the texts of Greek women members of the EU Parliament or EU institutions who are occupied with gender equality issues.

Sex specific violence frame with accent on women as victims

In this frame, domestic violence is seen as a problem between men and women, which is not necessarily associated with gender inequality. In other words, domestic violence is defined as violence against women in the private sphere. The discussion is focused on the sexual and cultural specificities of women and men: men are seen as by nature wishing to seek the sexual services of prostitutes and they are perceived as naturally aggressive, while women are the genuine victims. While women and children are primarily the victims, special emphasis is made concerning particular groups of women such as migrant women. This frame, which is not particularly prevalent, appears mainly in the texts of MPs that in general seem to hold conservative views.

Frames in suggested measures for combating violence against women (Prognostic Frames)

Criminalize domestic violence and sexual exploitation

The objectives in this case refer to the extensive and stricter prosecution and punishment of the perpetrators through criminalisation, as well as the combating of networks of organized crime and the legal protection and help

of victims associated with trafficking. Particular emphasis is given to the criminalisation of acts of violence against children. This frame underlines the obligation of the State to protect the fundamental human rights of citizens, human dignity and democracy. All speakers, as it happens, strongly support this view. The main goals are the recognition of acts of sexual violence as a crime and its effective legal control. The emphasis is on the legal protection of the victims of violence. Yet, the overall discussion is vague since there are no specific political measures associated with this view. Moreover, the demand for the criminalisation of *domestic* violence is politically weak and it is mainly promoted by certain women politicians or representatives of equality-promoting institutions.

Improvement of the Institutional Framework

Most speakers agree that it is necessary to modernize institutions so that the State will effectively guarantee the prevention and elimination of violence. The emphasis here is on the strengthening of coordinated action of public services and their cooperation with NGOs, as well as the modernization and improvement of police functioning and its better coordination with other agencies. Additionally, the systematic interdisciplinary investigation of the problem is considered an important step for the prevention and elimination of violence. Specific actions proposed, involve gathering data, monitoring progress and supervision by institutions and experts. Also, a number of women speakers and writers involved in gender equality issues, stress the need for the establishment of a national observatory.

Support and care for the victims

The accent here is on increased support and social care, more financing for shelters and help-lines as well as on fundamental psychological and legal support and health facilities. This is a welfare perspective that lays emphasis on the State's obligation to implement a relevant social policy through the establishment of institutions for the protection of the victims. It can be argued, that this frame suggests a remedy for the symptoms of violence and focuses on the causes of the problem and the structural inequalities of gender. However, this is mainly a de-gendered approach, in spite of the fact that it can have extensive positive implications for a large number of women who are victims.

A more radical sub-frame of this larger frame stresses the need for the empowerment of women that urges women victims to mobilize and to publicly reveal their problem. It also advises women to seek help in the

existing services for the support of victims. Such views are expressed by NGO's, women's organizations and the campaign of the General Secretariat for Equality. It seems that women are called upon to take action and to become agents of change in the perceptions and practices of a society that marginalizes and victimizes them.

Awareness raising and education strategies

The goals prescribed here are the production of systematic information and public awareness as well as the sensitisation and activation of civil society and the State. This is a gender-neutral approach based on the need for the consolidation of humanist values and individual and civil rights. It is also based on social consent formed around the disapproval and intolerance of criminal violence. This approach is evident in all analysed texts.

When violence is associated with gender inequality, in this frame, the emphasis is shifted more towards the awareness of equality issues and educating the public –as well as the potential perpetrators and victims– about the nature and the dimensions of the problem and the rights of women. Most of the proposals, in this context, aim at raising public awareness of the basic causes of the problem and ensuring the rights of women. There is also a lot of attention paid to the socialization practices of the young in schools, as well as in the family, practices viewed as in need of change, in the direction of the reduction of sexist perceptions and the promotion of ones based on principles of equality.

In addition, given the particularly «private» nature of domestic violence, there is strong emphasis on publicizing the problem of domestic violence and on the need for a better knowledge as to the ways it can be tackled with sensitivity and by specialised agencies. In this approach, women and equality-promoting institutions are viewed as the main agents of change.

Improve public morals and fight pornography and prostitution as factors that encourage and reproduce violence against women

Since public debate and policy in Greece, is especially concerned with the growing problems of violence related to trafficking and sexual exploitation, it is expected that strategies and proposals put forward within this general frame had, predictably, a specific emphasis. Most notably, a number of politicians stress the need for the improvement of public morals, social norms and behaviour and efforts to preserve traditional family values and the sanctity of sexual life. For these reasons, it is underlined that porno-

graphy and prostitution must be strongly fought against, and there must be strict control of the Internet, since these are the most important mechanisms that reproduce modern forms of violence and sexual exploitation of women and children. Some of the speakers support this view with regard to the significance and extent of these problems and point to the need for fighting public moral decadence in general. This is, obviously, mainly a conservative standpoint.

Modernization and international obligations

This frame represents state obligations as requirements or norms of modernisation aiming at the harmonization of domestic policy with EU norms and international conventions. Greek legislation must necessarily adjust to the new social reality and the spread of different forms of violence according to European legislation. This frame presents the norms, standards and requirements of international agencies as models to be followed and as frames of reference when evaluating policies and actions. The protection of human rights and the implementation of gender equality policies are major obligations. In addition, the strongest demands for modernisation are linked to the problem of the corruption in institutions (particularly the police) and the protection of the victims.

Women politicians and women or institutions concerned with equality hold similar views within this frame, which could be considered a liberal, approach to the problem of domestic violence and sexual violence, more generally. It must be noted also, that this frame is connected to a series of «modernisation frames», which are apparent in all policy areas, as an expression of important and contradictory aspects of a primary divide within Greek political culture.⁶

REMARKS ON THE GREEK PUBLIC DEBATE AND VIEWS ON SEXUAL VIOLENCE

For a number of concurrent reasons, the public debate on sexual violence has been focused in Greece, on the problem of trafficking. This has created a consensus amongst politicians who morally condemn all forms of violence, sexual exploitation and «modern slavery». Politicians, in this context, condemn what has been characterized as an horrible crime against humanity.

6. See M. Pantelidou Maloutas, this volume.

In contrast, although the problem of domestic violence was made a public issue because of trafficking, it was much less discussed and there were no systematic proposals for policy measures.

In the analysed parliamentary debates and other public documents, it is uniformly underlined that the problem of violence has several social dimensions and, therefore, public awareness, sensitisation and involvement of civil society are needed in order to deal with it. At the same time, it is unanimously stressed that there is a need for an international collaboration against the all-powerful networks of organized crime that play a decisive role in the expansion and reproduction of the problem.

On the other hand, there are significant differences as to the speakers' views and the ways they frame issues associated with gender and sexuality. These differences are apparent in the discussion of the above-mentioned problems. Despite the many references to the sexual exploitation of women or other sensitive social groups (such as children and migrant women), the speakers generally do not focus on the social and cultural dimensions of gender inequality or, more specifically, on the exclusion and the social inequalities affecting migrant women. On the contrary, the problems of violence are often reduced to problems of distortion and deterioration of morals, human weaknesses, social callousness and lack of respect for human rights.

The dominant rhetoric in the debate is either framed within a conservative perspective on the need for the defence of morals and traditional values, the protection of the institution of family and the sanctity of sexual life, or by a view stressing the safeguarding of human dignity and fundamental human rights and liberties that are consistent with a modern society and democracy.

It should be noted that, women politicians and institutions for women's issues relate all forms of violence and sexual exploitation to the unequal distribution of power between men and women and the enduring social exclusion of women. The difference between this approach to the problems of sexual violence and the previous ones, related to humanist and liberal views is that the first is mainly defined by the need for the consolidation of the principles of gender equality primarily through schooling and socialization in the family.

It should also be noted, that the call for women's empowerment, associated with this approach, which encourages women to mobilize and make their problem publicly known, is mainly based on the values of personal dignity and a life free from the fear of social stigmatisation, rather than gender equality principles. This is possibly a strategic framing aimed at

reaching a wider female audience than one that could identify with, what could be seen as, a feminist standpoint. In addition, this approach does not incorporate the view that the empowerment of women can be achieved through their increased personal and economic independence.

There is a broad consensus on many points among all speakers on the law on trafficking and its attendant problems. All, more or less, refer to the explosive growth of the problem during the last years, due to the particular location of Greece in relation to the countries of the former Eastern Block, and agree on the need for new policies against crime in this sphere and the modernisation of the legal system. They also agree that the problem has social dimensions that, in order to be tackled effectively, it is necessary to inform, awaken, sensitise and involve civil society. They also near-unanimously stress the need for international cooperation against the powerful crime networks that, according to all, are crucial factors in the growth and reproduction of the problem. Finally, they all agree, though with varying degrees of enthusiasm, that the new Law is a positive step in the right direction.

In contrast, there are significant differences and variations in the speakers' views with regard to gender and sexual violence issues that either openly or implicitly are raised in this context. Only a few speakers go beyond a humanistic and moralizing language which attempts to gain the audience's sympathy for the victims of trafficking. Indeed few espouse a feminist critical stance referring to the negative role of prostitution's «clients» and to domestic violence against women.

In general, the rhetoric that strongly frames speakers' discourse is one that more or less refers to the concerns for the protection of morals and traditional values – hence the frequent references to the «sanctity of sexual life», the family, the innocence of childhood etc. It also connects with broader humanistic concerns against practices that «befit the age of slave trade», rather than a modern society and in favour of principles protecting human dignity equally among men and women. Thus, the approach to gender and violence, in both diagnosis and prognosis in the Greek case is, either explicitly or implicitly, based on received social perceptions and stereotypes about the identities, behaviour patterns and social roles of women and men. There is a broad agreement on the categories of victims: women, children (mainly through pornography) and immigrants. These categories are often defined in toto as especially «vulnerable groups» – a concept that, furthermore, is given legal status by the new Law. Women are often referred to as a *de facto* vulnerable population group and as *de facto*

potential victims of violence and exploitation. No speaker, however, touches upon, or attempts any analysis of the social and gender-related structures that make for this incipient violence and victimisation. It is only pornography that is singled out as a guilty mechanism preserving and reproducing myths and stereotypes about maleness in relation to female sexuality (e.g. women enjoy rape and the like). Moreover, references to men as a gender category typically revolve around (the myth of) their self-evident and ancient need for sexual services from women. However, men as users and clients of prostitution are viewed by some women speakers as guilty of helping the growth and sustenance of trafficking networks.

POLICY FRAMES AT THE EU LEVEL⁷

There has not been much EU level policy on domestic violence or violence against women until 1999. Before 1999, a resolution on the need to establish a campaign aimed at violence against women was adopted in 1997⁸ and the Daphne initiative was also initiated in 1997, but there were not many documents to be found covering this subject during this period. This was also due to the fact that the main official competence of the EU has been in labour market issues for quite a long time. Thus, the only form of violence against women that could be addressed, and was addressed by the EU, had been «sexual harassment in the workplace». The only official EU document on violence against women, dating before 1995, was a resolution on violence against women (1986)⁹ that followed on a report by the Committee of Women's Rights in 1984.

7. For this and the following section, cf. M. Paantjens, 2004, in which a description of the selection of documents analysed, can also be found.

8. Which is the first document that was selected for our analysis. The second text is a press release about an Expert Meeting on Violence against women held under the German Presidency in Cologne. Because Daphne is the first European Programme to address Violence against Women on a larger scale, many texts referring to this programme have been selected. Also two texts about Daphne II were included. Also, texts from speeches of the commissioner for Employment and Social Affairs and the EU funded umbrella organization of Women's NGO of Europe, the EWL, were selected, as well as a text of the WAVE network (Women Against Violence Europe) in order to get a better picture of the ideas inside NGO's in Europe and to get a different voice than just the EWL.

9. European Parliament, *Resolution on Violence against Women*, OJ.C. 176, 14 July 86 (doc. A2-44/86).

In the Treaty of Amsterdam additions were made to the principle of equality between women and men. The aim was to specify the precise nature of a minimum basis of fundamental social rights. This would also make it easier for the Court of Justice to verify that fundamental rights are being duly respected.¹⁰ But even after the Amsterdam Treaty it has been difficult for the EU to address the problem of domestic violence or violence against women, as a proper legal basis for this often seemed difficult to be found. The Daphne Programme is a good example for this. Because the European Union didn't have a legal basis to address the problem of violence against women, article 235 (the article used to create a legal basis when there is none) was suggested. Not all member states accepted this and therefore article 129, which deals with public health, was used.

The problem of violence against women was also discussed at some expert meetings held under several presidencies. Documents, like speeches, press releases or statements from several of these expert meetings, have been included in our analysis.

Diagnostic Frames on domestic violence in the EU texts

Gender inequality causality frame

According to this frame domestic violence is first of all part or expression of male dominance and gender inequality. The problem is framed in terms of dominance, dependency or power and exploitation. It can also be more generally framed as «hegemonic power of men». This frame is present in many EU texts, where there is mention of «gender based violence» or the «unequal power balance» between men and women. In most texts, however, there is no deeper analysis of the causes of the problem or more detailed references to power relations or structural causes. It can differ in whether it is accentuating that gender inequality is the cause or the result of domestic violence.

Only in a few texts (expressing views of experts or NGO's) it is stated that violence against women forms an obstacle to equality or to the full participation of women in society, and that domestic violence is a result of structural inequalities presented as a gendered problem.

10. European Parliament, *Treaties and Conventions on Women's Rights*, January 1999.

Violence is a public matter frame

According to this frame the domestic violence problem is a hidden and invisible problem and public policy makers should seriously deal with it. The argumentation for the public dimension of this problem concerns the main social implication that it has: costs of violence for society, socio-economic costs due to health costs and lost labour hours/time. Domestic violence also represents a threat to democracy and society as a whole. Violence against women is a problem located in the organization of citizenship that requires the State's intervention.

There are several subframes to this public matter frame that are apparently related to the discussion and the texts that were finally adopted by the EU in the context of particular policy programmes dealing with domestic violence. According to the first subframe, domestic violence is a human rights issue, and as such, a public matter. Violence against women is represented as a problem because it means that there is a lack of human rights. Domestic violence constitutes a «violation of human rights of women against all democratic norms and values». Domestic violence is threatening fundamental rights, while a person's bodily and physical integrity should be respected.

This human rights approach corresponds to the «zero tolerance» campaign where the problem of domestic violence is framed in terms of violation of human rights and deficit of democracy. There are two views within this frame: human rights in a gender order frame, and a degendered view of violence against women as a human rights issue. This subframe –including both views– is located at the level of the organization or citizenship and it is very strong at the level of the European Union.

Another subframe is that domestic violence is mainly a health problem. This frame is found exclusively in European Union discourse. Domestic violence is a problem for individuals because it is considered as «a major health scourge», it represents a «high social and economic cost to society as a whole» because it affects people's health and thereby their ability to contribute to society. There are frequent references to the increase of public costs for health care due to depression and disability. This subframe is linked with the «Daphne» Program where the problem of domestic violence is precisely framed as a public health issue. If we keep in mind that in this program the definition of the problem includes children and young persons as well, we understand why this approach to the problem shifts to a relatively «de-gendered» approach.

In another subframe it is stressed that the state or the bureaucracy are failing to address domestic violence. This is more about performance than

about responsibility. The State is considered failing in its responsibility to protect and assist women citizens. In the texts, there are many references to the following: laws are ineffective, there is lack of a strong legal basis, services and persons dealing with victims are not trained, statistics are misleading and procedures are too complex. There is also reference to the lack of awareness that leads to a lack of resources and lack of legal protection. This subframe is mainly found in experts or NGO's texts.

De-gendered family violence frame

In this frame the discussion on the problem of *domestic violence* is basically gender neutral, as the gender of both perpetrators and victims is not mentioned. In reality there is no diagnosis of the problem or its causes. There is simply reference to this existing and intense problem. At the same time it is stressed that it affects the equal opportunities of victims. In this frame, occasionally some gender elements may be present, but the words «gender» or «equality» never appear. This frame is not a very frequent one at the EU level.

Sex specific violence frame with accent on women as victims

In this frame, domestic violence is seen as a problem between men and women, although there is no deeper analysis of gender. Domestic violence is defined as violence against women in the private sphere. It is about sex, not gender, and it is not so much about power or dominance, as about sex differences. The reference to women as primary victims is more an example of the phenomenon, but not a feature that defines the problem. Mostly it is seen as a problem for women, who are depicted as victims, while men are depicted as perpetrators. This frame mainly appears in texts associated with the Daphne programme where the problem of domestic violence is framed as a health problem and therefore there is no deeper analysis of the gender dimension of the problem. This is also not a very frequent frame in European Union's discourse.

Private matter frame

In this frame domestic violence is seen as a private problem. Although it does not appear as such in both the EU and experts or NGO's texts, it surfaces as a relevant subframe which argues that there is a friction or conflict between the private and the public sphere that makes domestic violence such a problem. Domestic violence is hard to prove, because «women do not talk because of shame, guilt or intimidation by their partner» (or, very often, another family member). There is a private/public friction because if women do not report the acts of violence, the State

traditionally has no power to intervene into the private sphere. This subframe however does not go as far as to claim that the issue is a private matter; it just emphasizes the difficulties that might occur because domestic violence occurs after all in the realm, which has traditionally been conceived as private. This frame is also not a very frequent one in the EU level.

Prognostic frames on domestic violence in the EU

Awareness raising and education strategies

The emphasis in this frame is on raising social and political awareness on the issue of domestic violence. The political proposals can be divided into three basic areas: the first concerns the increase of visibility of gender violence (break silence and lift taboos, disseminate information and data); the second is related to the change of perception of the public and the establishment of (new) role models and the third is associated with the education of the public and public officials as well as the potential victims and perpetrators about the nature and dimensions of the problem and the rights of victims (women).

Proposals in this frame vary in terms of values, ideology and suggested actions between simple humanitarian and cultural/educational betterment approaches to explicitly feminist ones concerned with gender equality. Hence the two major frame variants in this case are the gender-neutral one and the gender equality based one.

The most prevalent variant is the *gender-neutral* one based on humanist values, a respect for personal rights or, simply, abhorrence in the face of (criminal) violence. Consequently, the proposed strategies within this frame aim at strengthening these positive reactions through campaign and education. Moreover, given the particular private nature of domestic and, more generally, sexual, violence and the reluctance of victims to make their problem public and seek assistance and retribution for the perpetrators, there is a strong emphasis in this frame on publicizing the problem and the ways to fight it and raising the awareness of the public.

The other variant is associated with the gender equality frame, to the extent that it expresses the view that through awareness and education strategies, the realization of the deeper causes of the problem will be achieved, namely inequalities in resources, powers and social position based on roles, norms, attitudes or stereotypes.

The awareness raising and education strategies frame quite important in EU texts to the extent that many of the analysed texts are associated with

the Daphne programme of which one of the main goals was the «prevention of violence» through awareness raising.

Improvement of the institutional framework

This frame is related to the realisation that the problem of domestic violence and generally violence against women has not been rightly dealt with and that among other things there must be improvement of the institutional framework. Strategies corresponding to this approach are mainly those setting as a priority the cooperation and the information exchange between different levels of actions (i.e. between member states), the support/encouragement to women's NGOs and the cooperation between relevant actors, local authorities and NGO's. In most EU documents the participation of NGO's in this cooperation network is often emphasized.

There is also a large number of proposals referring to the necessity of promoting monitoring and research, of gathering the adequate data on domestic violence and develop indicators. These proposals are quite common among the European documents, along with guidelines to improve statistics of the incidence of domestic violence where monitoring and research is seen as integral part of prevention and early intervention strategies.

Finally, legal systems have to be improved: at the EU level with a view to a stronger political and legal basis for the punishment and persecution of perpetrators and better protection of victims. At the same time, the Governments of the member states must improve their legal framework, take measures and put the issue of domestic violence on the agenda on a national level. This is one of the most frequently found frames in the EU texts (along with the «Awareness raising» frame and the «Support and care for the victims» frame).

Support and care for the victims

In this frame there is particular emphasis on the protection, support and care for the *victims* of domestic and sexual violence. It is not only the causes of violence against women that are examined but also the causes of violence against children. New proposal are put forward for the better possible support of and care for the victims through the establishment of additional shelters and help-lines, the creation of support services dealing with violence and the improvement of legal support and health facilities etc.

Generally speaking this is mainly a de-gendered approach but with extensive positive implications for the large numbers of women who are the victims. In most cases this frame targets directly the effects of violence and

has little to say about addressing the causes of the problem or more structural issues of gender inequality. This frame appears in many EU texts.

A rather more radical sub-frame of this larger frame is the Empowerment of women. This sub-frame also emphasizes the priority of protecting and supporting the victims: it adds, however, a strong gender equality component. This perspective focuses more on the empowerment of women victims through increased personal or economic independence and better integration into the labour market as well as such specific actions as women's shelters maintained by women NGOs. Beyond adding this explicit gender aspect to the «support and protection of victims» frame it also addresses the structural causes of the problem such as gender inequalities in the society and the family and stereotypes of women as weak or passive. This sub-frame appears in a limited number of EU texts.

Criminalize domestic violence

The central idea of this frame is that gender violence is a crime and proposals are made aimed at promoting the criminalisation of acts of violence in the family. The view that is expressed is that the EU needs a legal basis for better protection for women and more severe punishment and prosecution for perpetrators. The approach is mainly a human rights approach. It proposes as a primary policy for handling domestic violence the prosecution and the (harsher) punishment of the perpetrator and the legal support for the victims.

This frame matches well with the «protection of victims» frame and the accent is on legislation amendments or the voting of new laws that are necessary for a series of reasons of which the most important seems to be the protection of victims. There is explicit reference to women and children and other «vulnerable groups» such as alien women. This frame is found in experts or NGO's texts mainly.

REMARKS ON THE EU PUBLIC DEBATE AND VIEWS ON SEXUAL VIOLENCE

The policy frames that emerge as most important within public discussion at the EU level in reference to violence against women and domestic violence more specifically, are those that are related to the two major programs adopted by EU during the study period: the «Daphne» program and the «Zero tolerance» campaign. Starting from the diagnosis level, we can say that both in official EU documents and in the texts of European women's NGO's or experts, the most important frame that

emerges is the «Public matter» frame with the various sub-frames related to it (the bureaucracy failure sub-frame, the human rights sub-frame and the public health sub-frame). These last two sub-frames seem to correspond more or less with the two main «policies» on the issue. The human rights approach with the «zero tolerance» campaign and the public health frame with the Daphne 2 Programme.

The frames found in analysed documents from European women's NGO's contain parts of a common argumentation, which can be typified as a feminist analysis of domestic violence. Domestic violence is seen to arise from an unequal balance of power between women and men, violence against women being the most obvious symptom of inequality. Parts of this frame («Gender inequality causality frame») can also be found in «unofficial» documents within EU institutions as well, in brochures, speeches etc.

The presence of the «Sex specific violence» frame with emphasis on women as victims is connected to the Daphne Programme and some other official EU documents where the causes of violence are not addressed. In these texts there is an absence of analysis of the deeper causes of domestic violence or of violence against women in general. No systematic analysis of the problem is provided, and no causal relations or mechanisms are mentioned: the problem is viewed as «just existing» or «having certain effects». The effect of such a view is that the problem is presented as a problem only for the victims of domestic violence.

The measures proposed at the EU level to fight domestic violence are aimed primarily at addressing the causes identified by the previous frames. Firstly low public awareness has to be combated with the help of gathering data, informing people about the problem and fighting against the reluctance of victims to make their problem public and seek assistance (Awareness raising and education strategies frame). This frame is a quite important one and it is found in all EU texts either in its gender-neutral variant or the gender equality based one.

The «Support and care for the victims» frame is present in quite a lot of the texts examined. This is mainly a de-gendered approach but with extensive positive implications for the large numbers of women who are the victims. Within this frame, which is relatively strong at the EU level, there is more concern and more references to the effects of violence that have to be treated rather than to its causes.

The «Improvement of the institutional framework» frame, with its emphasis on cooperation networks and the participation of NGO's is also a

very common frame. In contrast, the «Criminalize domestic violence» is not a particularly strong frame and it is mainly found in women experts» or NGO's texts.

When looking at the actors engaged in dealing with the issue of violence against women and children at EU level, the apparent gender neutrality of the problem is immediately challenged. The problem is obviously considered to be a women's problem and it is mainly left up to women to solve it. In the European parliament, the problem is debated by female MEP's only, the evaluations of policy programmes dealing with violence against women are executed by female rapporteurs, and reactions from advisory committees like the committee of the regions are written by its female members.

Feminist voices at the EU level agree in their view that the unequal power relations between women and men are the cause –and in a certain sense, also the effect– of violence against women. In some documents the argumentation is even stronger, representing violence against women as a «control mechanism used by men over women, to make sure they do not loose their dominant position in society» (EWL observatory 2000). WAVE appears to articulate an even stronger and probably more radical view on violence against women. According to this organisation, violence against women is a structural matter, a control mechanism exercised by men over women, intrinsic to a system of power and control, embedded in the social structure of society and linked to inequalities in the distribution of power between women and men. WAVE explicitly represents itself as being «feminist» and taking on a «feminist approach» to deal with domestic violence. Concerning the topic of domestic violence, measures proposed by NGOs range from «soft measures» like collecting statistics and awareness raising to «hard» legal measures.

Apart from these feminist voices outside of official EU bodies, there are certain similar voices in the EU itself as well (see, for instance, the speeches that commissioner Anna Diamantopoulou held on the issue of violence against women and Maj Britt Theorin MEP and chairperson of the Committee of Women's rights).

It is interesting to note that the «zero tolerance» campaign used a gender sensitive approach to the problem of domestic violence. The problem is legitimised as a public policy concern because it is a violation of human rights, but it is also said that it is a symptom of the unequal balance of power between women and men. With the introduction of the Daphne programme (the first and also the second phase) this gender sensitivity disappears from the definition of the problem and its analysis.

GREECE AND THE EU: SIMILARITIES AND DIFFERENCES

There are many similarities as well as differences between Greece and the EU in the policy framing of the issues of sexual violence and domestic violence. With regard to the similarities, this was expected to a certain extent, especially in the prognosis of the respective issues, in so far as some of the Greek texts were directly related to EU policies and programs, such as «Daphne» or «Zero Tolerance». Nevertheless, the extent of similarities was quite significant, indicating a lack of genuine local problematic and debate on the issues.

Regarding differences, these reflect the particular social realities found in Greece as well as the values and social norms that influence public discourse on sexual violence and domestic violence. Their particular character is often indicative of a more traditional, i.e. androcentric society, in which the social and power related aspects of the problem are less denounced. Differences in the framing also reflect the extent of social diffusion and acceptance of European policies and directives on these subjects, as well as the way that they are perceived and interpreted locally.

Concerning the main similarities of Greek and EU frames in the diagnosis of problem, it must be noted that the «public matter» frame is a common dominant frame that emerges consistently in Greek texts, as a central concern of all social actors, as well as in EU ones. Texts, in this case, converge to a common view that political will is absent or insufficient, and that the state or special public authorities fail to acknowledge, as they should, the problems of violence against women as ones that belong to the public sphere. Accordingly, this frame stresses that domestic violence and sexual violence are and should be recognised as a public responsibility. We note, in both sets of texts, a prevalent view that all forms of violence should be considered as criminal acts that are directed against essential aspects of democracy and the rights of citizens and that, therefore, the state has a responsibility to act towards protecting such fundamental values. This is an all encompassing frame, often co-occurrent with other frames or sub-frames, which dominates the diagnosis of the respective problem in all cases. In all other frames in the diagnosis there are bigger or smaller differences.

Regarding a sub-frame of the «public matter» frame, according to which domestic violence is a human rights issue and as such a public matter, it is strongly present in all Greek texts: in those related to domestic violence and the «zero tolerance» and Daphne 1 programs, as well as in the ones concerned with trafficking and, in more general terms, with violence against women. In the «human rights» sub-frame, both in EU and Greek texts, women are

represented as a special social category, often as vulnerable potential victims of violence. In Greece, they are often paired together with children or immigrants. The violence issue is mainly placed within the area of citizenship and more often than not appears as degendered, since human rights seem to overshadow the gender aspect. While the presence of this frame in EU texts is also important, there is the exception of texts related to Daphne 2, where the treatment of violence shifts away from a human rights approach, towards one based on its perception as a public health problem. This framing of the issue, according to which domestic violence is a problem for individuals because it affects their health and thereby their ability to contribute to society, is exclusively found in EU texts: there are no relevant references in Greek texts. The fact of the matter is that this new element was incorporated in the European texts, in the context of the second phase of the Daphne program,¹¹ as a compromise solution between the member-states, so that the program could be accepted by all and be carried out at a European level.

The «gender inequality causality» frame, referring to violence against women as a product of gender relations, seems to be quite a strong one in the EU level, while, in the case of Greek texts it is mainly found among the discourse of women members of the European parliament, experts on women's issues and representatives of organizations promoting equality (such as the Greek General Secretariat for Equality). In this frame, both in EU and Greek texts, the most frequently found social dimension in analysis addresses women and men as general social categories. Moreover, women are viewed as victims and men as perpetrators. This frame has special references within EU texts to intersecting variables such as age, race, nationality, ethnicity, immigration and class, while in Greece there are only references to the role of age (young girls are more vulnerable) and immigration (immigrant women and girls). In addition, references to prostitutes and prostitution are also made.

The «sex specific violence frame with accent on women as victims» where the problem of domestic and sexual violence is presented as, simply, a private problem between men and women engaged in sexual relationships, is not often found among EU texts, while in Greece it is present mainly in the discourse of conservative politicians. In contrast, the «de-gendered family violence» frame appears more strongly in EU texts than in Greek ones. References to domestic violence, in this case, are formulated in gender-

11. See Paantjens, M., 2004.

neutral terms and there's a pronounced absence of references to gender equality issues. In Greece, domestic violence is often presented as a «collateral» consequence of other forms of violence against women, as exemplified by trafficking etc.

Lastly, there is in the diagnostic frames a rather limited sub-frame related to the «private matter» frame, which views domestic violence as a corollary of frictions between the public and the private sphere. This is a «weak» frame that can only be found in a few EU texts not at all in Greek ones. On the contrary, a frame present in Greek texts that is absent from European ones is the one that could be titled «deteriorating society frame». This frame emerged in a parliamentary discussion, on the occasion of the debate on trafficking, which was linked to the idea of «the decline of morals and values in modern Greece» and the effects of this on sexual violence. Profoundly conservative and moralising, this way of framing the issue makes no reference to gender inequality.

In relation to the prognosis and proposals for policy measures at the level of EU as well as that of Greece, an important, albeit expected commonality of policy frames is noted. The proposed measures, in both cases, concern (a), the sensitising of society towards the problem, (b), the supply of help and care to the victims, (c) improved cooperation within the administrative system and (d) –to a rather lesser extent– the change of the legal system towards the criminalisation of domestic violence. The awareness raising and education strategies frame is a quite important frame in the EU texts to the extent that many of the examined texts are connected to the Daphne program that stressed, among its main goals, the «prevention of violence» through awareness raising. This frame is also important in Greece: it could be found in almost all of the examined texts (experts as well representatives of NGO's and MP's) where there is a strong emphasis on publicizing the problem of domestic violence and increasing public awareness about it.

The «support and care for the victims frame» emerges also as quite an important frame in both Greek and EU texts, where there are many concrete proposals for greater and more effective support and care of the victims. Furthermore, in a number of Greek texts, (those of women organisations and agencies promoting women's issues) a more radical sub-frame is also noted, one that stresses the need for the empowerment of women that should react against violent behaviour.

In the «improvement of the institutional framework» frame, the main concern centres on the need to modernise institutions and on strengthening

the coordination of actions among public services. It is one of the dominant frames in both the EU and Greek texts, while, on the contrary, the «criminalize domestic violence» frame can be found in much fewer occasions, in both Greek and EU texts. It is mainly put forward by women politicians or representatives of institutions promoting equality.

Lastly, it is solely among Greek texts that one can find two additional frames: the first one is the «modernization and international obligations» frame which is presented as an argument for the need to modernise Greek law on domestic and sexual violence in harmony with EU directives and the institutions of other, more advanced in the matter, member states. The second one is a sub-frame that could be titled «improve public morals and fight pornography and prostitution» as factors that encourage and reproduce violence against women. This frame, in accordance with a respective one in diagnosis, is apparent in the views of certain conservative politicians concerning the decline of values and morals in modern Greece. In the context of this sub-frame, the fight against sexual violence presupposes a broader fight against pornography and prostitution and what is viewed as the improvement of public and private values, with no reference to gender inequality.

SOME GENERAL CONCLUDING POINTS

As seen in the preceding analysis, there are extensive similarities between the policy frames detected in the discourse on domestic violence –and sexual violence against women– in Greece and the EU level. These similarities are greater in the case of policy proposals rather than in the diagnosis of the nature and causes of the problem, and are due to a very large extent, as already mentioned, to the fact that European programs such as Daphne or Zero Tolerance are also adopted and actively promoted in countries such as Greece. As a result, national politicians adopt and reproduce the central logic and the arguments and values of such programs or campaigns, framing their proposals accordingly. Especially since, due to the traditional character of Greek society, the issue does not seem to have gained any important prior visibility in decision-making fora, as a social problem in need of political solution.

There are, of course, significant differences in the framing in the texts examined depending on the role and origin or audience of the speaker or writer especially with regard to which dimensions of the problem are considered most crucial: we note differences between official EU texts, official government texts, those of MP's or members of the European

Parliament, experts or activists form NGO's. Most prominent are the differences among the texts of party politicians and those of women experts and representatives of women's organisations. A noteworthy example is the one in which the framing makes evident a moralising attitude that finally presents women as culpable for the violence against them, detected in overt form in Greek texts of conservative politicians.

Nevertheless, we may argue that both at the Greek level as well as the level of EU bodies and actors, with regard to violence against women and domestic violence more particularly, the prevailing view is one that defines this as a problem of *human rights* or a problem requiring social care – with no particular emphasis to the gender dimension or gender inequality. Our analysis has highlighted the important role of frames that create quite strong limitations to the influence of calls for and policies promoting gender mainstreaming at the European and national levels as a means for fighting against sexual violence. On the other hand, our analysis has also shown a broad consensus and a prevalence of humanitarian as well as practical views and strategies (legal/political/symbolic) that will certainly help promote some improvements in this field – most especially in the help and protection of victims. Thus, our results regarding the extent of effective gender mainstreaming in this specific policy field, as far as Greek policy making is concerned, are at best, mixed.

With regard to the theoretical and methodological issues raised by the use of frame analysis in this field, our conclusions, also, can only be mixed and provisional. The use of policy frames in the case of political debates has certainly helped us organise in systematic ways a material that, at first, seemed almost inaccessible and, furthermore, facilitated significant comparisons – despite the paucity of Greek texts. On the other hand, it would appear that frame analysis could suffer from a certain structuralist formalism that is prone to certain limitations with regard to the examination of the role and significance of «deeper» social and ideological structures and processes. Especially if one is not well acquainted with the social realities to which policy frames relate. Also, political texts –which are very close to rhetoric–, are by nature especially adept at deceiving the researcher on the real balance and role of ideologies and interests – as well as about the facts. This problem has become much more acute with the internationalisation of attitudes referring to *political correctness*. In the case of sexual violence against women the force of international conventions and agencies promoting

common policies, notably by the U.N. and, more recently by the EU has certainly exerted a strong homogenising effect on political discourse and ways of framing among the member states.

Thus, the significant similarities that have been noted between EU and Greek frames, especially on the level of prognosis, should be viewed with a certain scepticism, since they could hide significant differences in relation to specific local social and ideological aspects of policy making.

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