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Cleavage in a Tank Top: Bodily Prohibition and the Discourses of School Dress Codes

In this article I explore the gendered assumptions in the new generation of dress codes that have swept through North American schools in response to how girls are dressing these days. Through a feminist poststructural examination of a particular case in Langley, British Columbia, I locate three contradictory discourses in one school's dress code policy that positioned girls as irresponsible, deviant, and in need of help. I argue that these discourses reproduce dominant and oppressive forms of gender and sexuality. I conclude by suggesting that much work remains to be done on the minutiae of school policies such as dress codes given that they contribute to how the student(s) body is thought about, looked at, and treated.

Dans cet article, je me penche sur les hypothèses genrées sur lesquelles reposent les nouveaux codes vestimentaires qui ont été instaurés dans les écoles en Amérique du Nord en réaction à la tenue des filles de nos jours. Une étude féministe poststructurale d'un cas à Langley, en Colombie-Britannique a révélé trois discours contradictoires dans la politique vestimentaire d'une école où le code présentait les filles comme étant irréfléchies, déviantes et ayant besoin d'aide. Je propose que ces discours reproduisent les positions dominantes et abusives face à la sexualité et au rôle des hommes et des femmes. Je termine l'article en concluant qu'il reste beaucoup de travail à accomplir dans le domaine des politiques scolaires comme les codes vestimentaires étant donné que ceux-ci jouent un rôle dans la façon que l'on perçoit, regarde et aborde le corps des étudiants.

Thou shalt not go near, thou shalt not touch, thou shalt not consume, thou shalt not experience pleasure, thou shalt not speak, thou shalt not show thyself; ultimately thou shalt not exist, except in darkness and secrecy. (Foucault, 1978, p. 84)

Addressing Dress

In the wake of "new" styles that girls have been sporting in the late 20th and early 21st centuries,¹ a pervasive panic over dress has ensued in most North American high schools. The panic is twofold. First, administrators have felt the need to bring their schools under control given the "sexual" or "aggressive" nature of girls' fashion by writing new dress codes for insertion into their schools' code of conduct.² Second, students have felt the need to resist this new generation of dress codes in order to fight for their right to look how they wish. This double panic has caused a considerable amount of tension in schools as administrators scramble to catch up with fashion trends that students—specifically girls—seem determined to wear. Consider these cases. In Edmonton, Alberta, a 15-year-old girl sued her former school principal and the Edmonton Public School Board because she was excluded from her grade 9 graduation.

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She was banned for dyeing her hair blue (Goyette, 1999; Kent, 1999; Sass, 1999). In Toronto, Ontario, girls were sent home from their middle school for wearing skirts that were too short (Brown, 1998) and for showing their navels (Bay, 1998). In Vancouver, British Columbia, “distracting and inappropriate outfits are forbidden” at one junior high school (Papple, 2000, p. A2). At a high school in Burlington, Ontario, students are required to dress with “good taste,” in clothing that displays a “business-like attitude” (Wheeler, 1997, p. N3). In Calgary, Alberta, the principal of one high school banned “see-through blouses, belly shirts, industrial chains and short cutoffs” (Zachary, 1998, p. E2). In Pembroke, Ontario, a 16-year-old girl was sent home because she refused to take out her eyebrow ring (Bell & Austin, 1999). And in Langley, British Columbia, a young woman was sent home from her high school for wearing a top that her principal deemed inappropriate because “it showed too much cleavage” (p. A4).

According to Raby (2004), codes of conduct are “sites through which subjectivities are created (e.g., the ‘responsible’ citizen) and internalized governance is cultivated to create students—and thus future adults—fitting for neo-liberal capitalism” (p. 73). As Raby suggests, codes of conduct operate as a form of governmentality (Foucault, 1978), where students are trained to regulate themselves as docile and, therefore, good citizens both in the school and in society. Once written into a school’s code of conduct, the power of dress codes becomes “essentially juridical, centered on nothing more than statements of the law and the operation of taboos” (Foucault, 1978, p. 85), making punishments for dress code infractions seem normal and reasonable. As a school trustee in Surrey, British Columbia, noted, dress codes are “for safety reasons, for pride and for discipline” (Papple & Swanson, 1999, p. A3). And according to Ontario’s provincial-wide code of conduct, dress codes contribute to “safe, respectful environments for learning and teaching” (Backgrounder, 2000).

Nevertheless, with all the importance being ascribed to dress codes in schools as a feature of well-being and civility, little has been said about the effect that dress codes have on the student(s) body as a form of “everyday pedagogy” (Luke, 1996). Luke sees pedagogy as occurring beyond the teaching and learning of the classroom and places it squarely in the realm of social relations and activities. As Luke explains, pedagogy also relates to how we learn gender, race, ethnicity, class, and sexuality, or “feminine identities as they are variously constructed in potentially transgressive as well as normative models in a variety of public discourses” (p. 8). Dress codes function as everyday pedagogy through what Foucault (1978) calls a “regulatory ideal.” As Butler (1993) explains with regard to sex, dress codes are not just norms, they are also productive in that they have “the power to produce—demarcate, circulate, differentiate—the bodies [they] control” (p. 1). Dress codes thus form the criteria for “which bodies matter” (p. 4) in the school and which bodies do not. Similarly, Symes and Meadmore (1996) suggest that dress is a tool for “regularizing and governing, hierarchicalizing and normalizing the school population” (p. 177). Thus this seemingly neutral form of school law needs to be continually patrolled, particularly in an era when dress codes are being rewritten in order to deal with how girls are dressing these days.

In what follows I take a closer look at dress in the school by focusing on one example: the case of Marcia Stevens and the low-cut tank top. Though lip service is paid to order and civility, cleanliness and decency, politeness and decorum in the school's code of conduct, this case demonstrates the implicit lessons that dress codes teach students. Marcia's "large" and "bosomy" body was prohibited as boys' bodies and more traditionally feminine (smaller, thinner) girls' bodies were not. As a result, this case reveals one of the many invisible ways that the school organizes young women's sexuality and femininity (Bettie, 2003; Currie, 1999; Gonick 2003; Hey, 1997; Kelly, 2000; Lesko, 1988; McRobbie, 1991; Tolman & Higgins, 1996). Dress is part of what Haraway (1991) terms "border wars," or attempts to fix the continually shifting boundaries between a proper and improper femininity, or a right and a wrong kind of girl. This regulatory power intersects with issues of race, ethnicity, class, gender, sexuality, and citizenship, where a girl is either a welcomed subject in the school or cast as the "constitutive outside" (Butler, 1993, p. 3) whose presence is made abject by her failure to conform to "respectable" (white, middle-class, heteronormative) girlhood. As in Marcia's case, the codification of dress as school law allows the administration to patrol these gendered borders, continually enforcing and (re)producing a dominant form of girlhood in the school.

A feminist poststructural analysis is particularly useful here, as I seek to "question the location of social meaning in fixed signs" (Weedon, 1987, p. 25), specifically as those meanings pertain to the fixed signs that dress codes create for young women and, of course, for young men. In order to do so I explore the public discourses that surround this event including Pine Grove's code of conduct and the subsequent media coverage of Marcia's case. As Davies (2000) suggests, feminist poststructural analyses focus "on the possibilities opened up when dominant language practices are made visible and revisable" (p. 179). By highlighting the three discourses around which this case hinged—the responsible discourse, the deviant discourse, and the help discourse—I hope to make the language of dress codes visible and create space for some necessary questions: How do dress codes teach students to think about theirs and others' bodies? And how do dress codes shape students' understandings of gender and sexuality in the school? As everyday pedagogy, dress codes generate a "curriculum of the body" (Lesko, 1988) based on how young women and young men should be thought about, looked at, and treated. Dress codes are thus a visible expression of the invisible and gendered power relations that structure the school.

*The Case of Marcia Stevens*³

In June 1999, three weeks before classes ended for the summer, 15-year-old Marcia Stevens was sent home from Pine Grove Secondary School in Langley, British Columbia, for wearing a tank top that breached her school's dress code policy. The principal deemed the tank top with spaghetti straps inappropriate because "it showed too much cleavage" (Bell & Austin, 1999, p. A4). She was told not to wear the top to school again. The next day, Marcia returned to school with her father. Michael Stevens met with both the principal and the guidance counselor to discuss his daughter's dress code infraction, later expressing his bewilderment and emotion over the issue when he asked a

reporter, "What are they trying to do, make my daughter *ashamed* of her body?" (p. A4).

Many Canadian newspapers ran the story, including a picture of Marcia in the offending top. Almost all the reports mentioned that Marcia was "more developed than other girls" (*Vancouver Province*, 1999, p. A19) and that "if the same shirt was worn by a different girl, it may not have been an issue" (Sieberg, 1999, p. B4). The principal of Pine Grove also noted that "on a different young woman, [the top] might reveal less cleavage" (p. B4). In fact other, "less developed" young women were not asked to change out of tank tops similar to the one that got Marcia in trouble (Porter, 1999). So why was Marcia sent home whereas other girls in tank tops were not? To begin answering this question, I take a closer look at Pine Grove's dress code policy.

Pine Grove's dress code is a written document located in the school's handbook, along with other rules and regulations that govern behavior, classroom expectations, and safety and harassment issues. Under the heading *Clothing* are seven rules listed with this introduction: "Clothing regulations in the school are established for safety reasons and in order to maintain a suitable school atmosphere. The following guidelines should help you decide what is appropriate." In all, only three rules relate to dress in the school: (a) students must dress in a businesslike manner, not in clothing that is more appropriate for the beach or an evening party; (b) students must not wear inappropriate slogans or "badges" and name brands promoting inappropriate substances; and (c) students must not wear clothing that has reference to drugs, alcohol, sex, rude or racist language. The section on clothing then concludes with this codicil: "Students who do not adhere to the above guidelines will be approached by counseling and administrative personnel." There is no mention of cleavage, tank tops, spaghetti straps, or anything at all specific, just the repeated call for "appropriate" dress.

In order for Pine Grove's principal to single Marcia out, he would have had to interpret the dress code in a certain way. He would have had to look at the three rules relating to dress in the school and conclude that Marcia's choice of top was inappropriate. Was her tank top businesslike? Well, no more businesslike than the tank tops worn by numerous other girls that day. Did it contain slogans? No. Were there references to drugs, alcohol, sex, and rude or racist language? Not in the conventional or obvious sense. It was not that Marcia's top had a sexy picture on it or a four-letter word. It is not that her top asked a pornographic question or made some kind of dirty pun. But based on the disciplinary action taken by the principal, it is clear that he interpreted Pine Grove's dress code policy in the broadest sense. Marcia had done more than simply use her tank top as a billboard for sex. She had used her entire body. The tank top was part of a signifying practice that caused the principal to read Marcia herself as a reference to sex in her entirety. She was, therefore, inappropriately dressed according to her school's policy.

Reporters classified Marcia as "a little too daring for Pine Grove Secondary" (Austin, 1999, p. A2), who before this incident was a "fine student without behavioral problems" (Porter, 1999, p. B4). But it was not actually the tank top itself that created this bad-girl persona in the press or in Marcia's school; it was cleavage: cleavage only visible because Marcia was "larger" than other girls. In

fact Marcia did not commit a dress code violation at all. Her crime was corporeal. She was punished for having the wrong kind of (“fat,” “messy”) body in an article of clothing that was not considered inappropriate on other kinds of (“thin,” “neat”) bodies. Marcia’s body was “inappropriate” because it spilled out; it was not “ladylike” or “schoollike,” it was not tidy, and it was not easily contained. In short her body was visible *as* a body. And the visibility of a young woman’s body, according to this dress code interpretation, was tantamount to a crime. Her body made “maintaining a suitable school atmosphere” impossible, or so the principal and the guidance counselor believed who both agreed to send her home that day.

Reading Cleavage in a Tank Top

The principal’s broad interpretation of school dress code policy enabled him to turn cleavage in a tank top into a safety violation. How? What did Marcia’s body signify that was so dangerous to the well being of the school? Through a specific set of signifying practices, the principal and the school’s guidance counselor read Marcia’s body as “risky” in three ways that I return to in detail below: she was a risk to the school community, she was a risk to the boys, and she was a risk to herself. This reading is based on a fixed notion of femininity that is normalized in the language of dress code policies. According to Barthes (1990), language eliminates the random potential of an image and creates one meaning, arresting

the level of reading at its fabric, at its belt, at the accessory which adorns it. Thus every written word has a function of authority insofar as it chooses—by proxy, so to speak—instead of the eye. The image freezes an endless number of possibilities; words determine a single certainty. (p. 13)

For example, dress codes tell us how to read the student(s) body as good or bad, violent or safe, sexual or virginal, feminine or unfeminine, gang member or “good” citizen, appropriate or inappropriate. There is nothing in between these binary oppositions. Such readings extract a “final set of meanings from the seemingly endless, often apparently random, play of signifiers” (Hebdige, 1979, p. 117) that constitutes dress in the school. As such, tank tops or spaghetti straps or midriffs or nose rings or blue hair or dog collars become infused with social messages—a final script with a definite outcome.

Reading Marcia’s cleavage in a tank top as a static sign allowed the school administration to designate her as a “bad girl” who broke school law and who, therefore, deserved to be punished. As Barthes (1990) points out, when clothing is converted into writing, it loses its practical and aesthetic function, as written clothing is “entirely constituted with a view to signification” (p. 8). In other words, dress codes as written clothing are for the express purpose of creating stable social categories by which to mark and identify students. But there is another way to read this text from a feminist poststructural point of view. If situated within social, historical, and cultural practices, dress codes in the school become more than a static collection of signs; dress codes become discourse. Reading signs against and through a context forces us to move away from socially prescribed meanings and messages that freeze femininity or masculinity in one dominant form. Instead the signification that infiltrates social categories becomes evident, and how we have been defined by such

significations becomes observable. From this perspective, the relationship between “language, social institutions, subjectivity and power” (Weedon, 1987, p. 35) is made noticeable, and we are able to witness how power is secured: creating, reproducing, affecting, mediating, and constituting social organization (Fraser, 1992).

A feminist poststructural analysis takes as its problematic how “we become gendered beings” (Davies, 1993, p. 1), investigating “the historically specific social practices through which cultural descriptions of gender are produced and circulated” (Fraser, 1992, p. 178). School-enforced modes of dress are one such social practice, where seemingly stable gender categories are revealed to be a series of significations, an effect of “the power of discursive regimes of language and representation” (Bryson & de Castell, 1993, p. 345). It is thus impossible to ignore the significations that dress codes create for young women, young men, teachers, and administrators in the school, all of whom are implicated in how dress codes construct the body. Such significations are part of the production of girlhood itself. Jones (1993) suggests that, “girls become ‘girls’ by participating within those available sets of social meanings and practices—discourses—which define them as girls” (p. 159). It is, therefore, necessary to move beyond the school’s static reading of Marcia’s body as “risky” and ask: how do dress codes participate in the definition of girlhood? Through an exploration of how cleavage in a tank top was signified at Pine Grove, I situate dress code policy in three contradictory and, I suggest, unfair discourses surrounding girls—and by implication boys—in the school.

The Responsible Discourse:

Cleavage in a Tank Top is a Risk to the School Community

Various headlines from Canadian newspapers delighted in making puns about Marcia Stevens such as “Cleavage gets girl busted by high-school principal” (Austin, 1999, p. A2), “Strap flap over” (Papple & Swanson, 1999, p. A3), or “Busted attitude” (*Vancouver Province*, 1999, p. A19). These breast and bra jokes—a reminder that Marcia’s “crime” was of a sexual and corporeal kind—paint a picture of moral transgression. Dress in the school is part of “the moral sphere of education, in which the capacity to dress as the school requires constitutes one of the technologies by which the ethical state of students and schools can be measured and calibrated” (Symes & Meadmore, 1996, p. 190). Marcia’s tank top was “inappropriate” because it signified a lapse in the moral and ethical state of the school. But if the school is indeed a moral community, where “citizens are required to pay taxes to meet the educational needs of other individuals” (Fine, 1990, p. 108),⁴ it stands to reason that the responsibility for a school’s moral climate would fall evenly on the shoulders of the administration, the teachers, the students, and the parents. But does it? Marcia’s example shows that this burden is placed on young women more than any other group. And not only is the onus on young women to maintain morality in the school, but this responsibility is considered a requirement of girlhood itself: a “natural” duty.

Marcia’s dress code transgression indicated to school administration that she was not upholding her duty as a young woman. Her duty, this discourse implies, was to patrol the borders of morality in the school, entailing among other things keeping male sexual urges in check. Her job was to be an example

of control and will power. By showing cleavage, Marcia breached this responsibility and became a distraction not just to the boys in the school, but also to the teachers and administration. Her visible body betrayed her duty to the school by creating a disturbance not just of a sexual kind, but of an immoral kind as well. By making her body visible, Marcia became irresponsible, signifying unpredictability and disorder.

But more than a negation of a feminine duty to the school, this discourse signifies that the boys and men cannot be held responsible for their inability to concentrate and that it is the girls' job to make sure the boys are not agitated, confused, or "horny." One angry young woman, hearing this discourse in the news repeatedly, responded thus: "So let me get this straight. Men are physical human beings, and women are mere distractions? Like beer, females are intoxicating temptations who can simply be removed?" (Bay, 1998, p. C5). Making young women responsible for the school's moral climate sends a complex message to boys and men: girls' bodies *are* and *are not* meant to be looked at, ogled, and lusted after. But if you do look, you are not to be held accountable. It is the girls' fault for not upholding her "natural" obligation to defer your attention.

As a distraction, Marcia's body was a risk to the moral community of the school because girls are meant to keep boys' hormones in check—to bear the burden of responsibility—but further, the very thing that they must not distract boys from is getting a good education. In telling girls that their clothing is a distraction to the boys, a disturbing reality is signified: the education of boys is more important than that of girls. One columnist for the *Vancouver Province* fell into this discourse when he wrote,

And they wonder why boys in [British Columbia's] schools are turning into classic under-achievers. It beats me how the poor lads get any work done. Half their classmates these days are coming to school in tight Capri pants, spaghetti-strap tank-tops, baby-T's mini-skirts with slits up to the hips and way too much of that pink baby-doll lipstick. (Clough, 1999, p. A4)

But who is worried about distractions that may take girls away from their studies? How do boys' bodies contribute to distracting the girls? And what responsibility is placed on young men for maintaining the moral community of the school if they are not to be held accountable for their own sexual desires? Although boys' bodies are certainly regulated by dress codes, such regulation is not about sexuality, but rather violence, gang membership, good citizenship, and a corporate mentality that curtails racial and ethnic expressions of culture and belonging. Although these regulations work to reproduce dominant (white, middle-class, heteronormative) masculinity, they also suggest that only boys have sexual desires and that girls are not distracted by boys' bodies.

Marcia's case plays into essentialist/biological debates about the "nature" of both young men and young women. Are the girls to blame when male teachers lose their jobs for enacting sexual thoughts or when boys get sexually flustered and flunk out of class? Further, are the girls to blame when the boys snap their bra straps, throw pens down their shirts, or pin them to walls in the hallway? A similar argument is made by Kenway and Willis (1998) in their study of gender relations in Australian schools, where sex-based harassment is often considered normal. It was discovered that students, teachers, and the

administration viewed harassment as a rite of passage for boys, signifying the belief that

Those who harass are incapable of controlling their sexuality, either because it is a testosterone problem or because they are slow developers lacking in confidence, immature and therefore victims of maturation.... The essential aggression-nurturance dualism within this discourse absolves many boys from responsibility for their aggression since "boys will be boys." It also demands that girls take responsibility for dealing with and understanding that aggression since "girls should be girls." (pp. 108-109)

The same discourse is invoked for sex-based harassment as for dressing "appropriately" in the school. As a matter of "natural" fact, boys cannot help themselves, so the girls—who are "naturally" more responsible—had better take the lead. The *boys will be boys* discourse thus does grave harm to boys too, who are fixed in devastating notions of heteronormativity and masculinity that limit who they can *be* in the school. Yet rather than teaching young men and women about mutual respect for theirs and others' bodies, the responsible discourse inherent in school dress codes simply foists upholding the morality of the school onto girls' shoulders.

The Deviant Discourse: Cleavage in a Tank Top is a Risk to the Boys

Following on the heels of the responsible discourse, a second discourse emerges based on the developmental model for normal adolescence. Young people are often charged with deviance when they fail to conform to the stages set out by psychological discourses (Lesko, 1996; Walkerdine, 1990). For girls, failing to conform is another way of saying that a young woman is doing things that she should not be doing "for her age." She is ahead of herself. Her body is ahead of her. She is perceived as having more experience than one should have at such an age or that she is acting inappropriately. Certainly where a girl is concerned, this discourse is invoked more often than not when her sexuality becomes noticeable: "When women act as sexual agents, expressing their own sexual desire ... they are often portrayed as threatening, deviant, and bad" (Tolman & Higgins, 1996, p. 205). Marcia is a perfect example of this presumed deviance. She was punished for showing "too much" cleavage. As I mention above, her cleavage was only a crime because it spilled out and made her visible as a sexual being. Part of Marcia's punishment was a consultation with her father and the school's guidance counselor. The inclusion of a counselor—someone who is trained in adolescent psychology—signifies two things: Marcia's body was pathologized, and her sexual display made her a deviant. The president of the Langley District Parent Advisory Council immediately recognized this problem. The message conveyed to teenage girls, she said, is that "once they grow and develop breasts, they are often offensive" (Papple & Swanson, 1999, p. A3).

The fact that Marcia was a "big" girl with cleavage emphasizes how her body came to be read as too tempting for the boys. Her body told the story of an "abnormal," "atypical," and "problematic" young woman. Why? Are large-breasted young women more prone to having sex? Are large-breasted young women more "slutty"? As part of the signifying practice that enabled the school's administration to read Marcia's body as sex in its entirety, this dis-

course assumes these things to be true. But there is more at stake. A young woman who is at ease with her body, who is a sexual subject (not merely a sexual object for the male gaze), who enjoys how she looks in a tank top, and who is proud of her body no matter what her size is a threat to the dominant discourses of both femininity and masculinity in the school. The signification is read as follows: a young woman with ample and exposed cleavage is obviously promiscuous. She may become pregnant. She may contract a disease. She may drop out of school. She may also lure boys and men into fatherhood at a young age.

Feeding into this discourse, the principal of one Ontario high school sent a message to parents with this caution:

Girls wearing short skirts should think about how they sit and what is revealed when they bend over, and consider wearing shorts underneath ... It's my job as principal to keep students contained in an environment where they [boys and teachers] can learn [and teach] without distraction. (Brown, 1998, p. A1)

Once again, the education of boys is of central focus whereas the girls are kept from spilling out of their "deviant" attire. But unlike the responsible discourse, where young women are expected to uphold a certain moral obligation, here girls are seen to be luring boys and teachers into depravity, enticing and coaxing them away from their studies and jobs. The deviant discourse makes Marcia dishonorable. Her cleavage is a disease. And containment is the cure.

When Marcia's father asked a reporter if the principal of Pine Grove was trying to make his daughter ashamed of her body, he was close. Marcia was not so much meant to feel ashamed of her body as she was meant to feel shame for her lack of "feminine" modesty. This shame-induced mentality was also shown to exist in Lesko's (1988) study of Catholic schoolgirls. Girls were granted a higher status in the school hierarchy if their appearance and clothing followed "traditional feminine dictates or modesty, youthfulness, and niceness." Conversely, those who dressed in the opposite manner were designated as "loose," "hard," and "polluted" (p. 124). Dress codes thus function as a form of female *othering*, creating a league of "bad girls" and "bad bodies." Displaying or embodying sexuality lumps young women into categories of sexual delinquency. By pathologizing Marcia's body, by turning her into a deviant who is out of step with "normal" models of "good-girl" adolescence, the message is clear: a sexy girl is a "bad girl" and a "bad girl" is a risk to both the school's moral community and to the boys, who deserve to study without all that distraction.

The Help Discourse: Cleavage in a Tank top is a Risk to the Girl

The third discourse inherent in the Marcia Stevens case builds from the other two. This case is about schoolgirl sexuality and its discontents. As "naturally" responsible, Marcia's sexuality was a breach of duty to the school. As a "deviant," Marcia's sexuality was a risk to others. The fear that she would spread "bad-girl disease" caused the principal to contain her for the good of others. But the help discourse reads cleavage in a tank top as dangerous to the girl in question: someone who obviously does not know what she is doing, whom she is titillating, or how her own body functions as prey. Unlike the threat of social contamination in the deviant discourse, this discourse thrives under the guise of worry and concern for the girl's safety. A sexy girl is "at risk"

for harassment, emotional scarring, and rape. The school administration thus takes on the duty of protecting girls from their own bodies because they do not know enough to protect themselves.

Unlike the hyperexperienced, guilt-ridden flavor of the other two discourses, this discourse takes away Marcia's agency to know how she was representing herself in the context of the school's social world, where clothing has complex significations in relation to popularity, race, ethnicity, class, sexuality, and gender (Pomerantz, 2005, 2006). The "danger" Marcia put herself in was viewed as naïve, evoking sighs from knowing adults, who believe young women are pressured by the media and by boys to dress in particular ("slutty") ways. As Lesko (1996) suggests, this mentality is similar to that of colonizers who feel they must rescue other, less knowledgeable peoples, who must enlighten them and alert them to the right way of doing things. Here Marcia's case is not conflated with adult-like emotions; she is not given any responsibility or made to feel shame. Here she is infantilized through bodily prohibition. She is a dupe who must be kept under surveillance. The help discourse manifests in a concern that "girls [are] being pressured into sexual roles early" (Brown, 1998, p. A1). Some schools have even taken up the practice of keeping long-sleeved shirts in the office for quick cover-ups of the midriff or the cleavage if necessary (Papple, 2000). This discourse is thus an extension of the *she was asking for it* argument often evoked in sexual assault cases and inherent in the responsible discourse. If she had only known better, only considered her actions more closely, she could have averted the penalties of being a "bad girl" trapped in bad-girl consequences.

Cleavage in a tank top comes to signify a girl who is unaware of the power of her own sexuality, a girl who is once again prone to lead the boys and men astray. Her susceptibility to sexual encounters—not because she wants to, but because she does not know better—make her an easy target for victimization. Unlike the deviant discourse, this discourse presumes that the girl will be swept away or hijacked instead of making a conscious decision to have sex. Even as Marcia's accountability was denied her, she was still made responsible. It was not those who might take advantage of Marcia's lack of savvy who were hauled into the principal's office for stern words, but rather she who was blamed and disciplined.

The Logic of School Dress Codes

The three discourses inherent in the Marcia Stevens case are riddled with contradictory messages. Classifying Marcia as an inexperienced child belies the worldly deviancy of luring boys and men into "wicked" situations. Classifying Marcia as a responsible adult who must uphold her school's moral community belies the notion that she is a little girl who is easily duped by the media into looking sexy and pressured to conform to a particular kind of coquettish femininity. Which is the correct crime? Is she irresponsible, abnormal, or stupid? According to Foucault (1978), these contradictions follow the "logic of censorship," in that "the logic of power exerted on sex is the paradoxical logic of a law that might be expressed as an injunction of nonexistence, nonmanifestation, and silence" (p. 84). For example, if girls are dupes, then their sexuality cannot be said to exist. Schoolgirl sexuality, then, is a lie. If girls are responsible, then their sexuality is unnatural and, therefore, must be concealed for the

greater good. Schoolgirl sexuality is, then, a disgrace. And if girls are deviant, then their sexuality must be silenced in order to protect those who would be led astray. This silencing is a full admission that schoolgirl sexuality does indeed exist.

A feminist poststructural analysis allows all these conflicting discourses to be heard and seen as significations that help to create and define femininity and masculinity in the school. My point here is to show that dress codes are more than just words enforcing a straightforward and impartial school policy. Codifying the body through text allows the school to create social categories that leave their mark not just on the student('s) body, but also on the formation of gender and sexuality. Marcia became a slut, a reckless menace, and a threat to the citizenry of the school. She was seen to be irresponsible. She craved attention. She was devious, mischievous, and dangerous. She was uncovered. She was visible.

Although a feminist poststructural analysis seeks to scrutinize how gender is produced through the constitutive force of language, it also seeks to locate agency and resistance to this constitution by locating instances of reiteration, or a speaking back to how we have been spoken into existence by others (Butler, 1990; Davies, 1993, 1997). Although the dress code policy at Pine Grove worked to position Marcia as a particular kind of girl ("immoral," "slutty," "victim"), she refused to accept those positionings and fought against the school's ruling that her cleavage in a tank top was inappropriate. In an effort to challenge the school's prohibition on her body, Marcia circulated a petition to present to the school's Parent Advisory Council. Marcia saw her school's dress code policy as "outdated and in need of reassessment" (Sieberg, 1999, p. B4). In garnering over 150 signatures, Marcia was highly aware of how the school had subjected her to an unfair conceptualization of her body. Further, her protest emphasized the school's injustice toward boys and men by positioning them as incapable of understanding how to treat girls.

Imperceptible Examples

The case of Marcia Stevens offers an example of how dress codes work to contain young women's sexuality in the school through the reproduction of "good-girl" (white, middle-class, heteronormative) femininity. And although the press continues to highlight dress code infractions that pertain to girls, the power of dress codes is that they operate at the intersection of gender, race, ethnicity, class, sexuality, and citizenship, where boys are just as regulated as girls, but in a slightly different fashion. Although the focus on "normal" modes of dress for girls is about the containment of the body, for boys the focus on "normal" dress is about containment of racial and ethnic identities. Prohibitions on boys' dress (gang paraphernalia, rude slogans, ball caps in the school, bandanas, etc.) have long been on the books, yet one recent edition deserves mention here: the visibility of boys' boxer shorts. The prohibition about jeans that hang so low as to reveal the waistband of boys' underwear raises questions about the relationship between that particular style and hip hop music, which in turn relates to concerns about the expression of racial and ethnic identities in the school. Here another example of the implicit lessons inherent in dress codes is made manifest.

Dress codes may be a tiny segment of a school's code of conduct, but they are in dire need of further analysis "in order to tease out their possible meanings" (Jones, 1993, p. 164) as everyday pedagogies that have profound effects on the student(s) body. I invite researchers and educators to further this analysis by focusing on some of the more invisible practices of the school. Dress code policy is only one such pedagogy that teaches by its almost imperceptible example. A deeper understanding of the discourses inherent in dress codes will help to challenge the enduring oppressions about gender, race, ethnicity, and sexuality in our society: a fixity held firmly in place by the prohibitions, policies, and punishments of the school.

Notes

¹The "new" styles that caused a flurry of revisions to dress code policies in North American schools include tight, low-rise jeans, midriff-revealing tops, tank tops with spaghetti straps, visible bra straps, and mini skirts. These styles are often attributed to pop stars such as Britney Spears, Christina Aguilera, and Jennifer Lopez. Other styles that have caused concern include an "edgier" or more "aggressive" look affiliated with punk, goth, and skateboarding subcultures, including facial piercings, tattoos, and spiked dog collars or wrist bands. These styles are often attributed to pop stars such as Avril Lavigne and pop-punk bands such as Sum 41, Blink 182, and Simple Plan. For a detailed analysis of how such styles are an intricate part of identity negotiation for girls in the school, see Pomerantz (2005, 2006).

²A school's code of conduct is the place where "expectations for how students should behave" (Raby, 2004, p. 71) are codified and thus take on the presumption of school law.

³Marcia Stevens is a pseudonym, as is the name for the school she attended, Pine Grove High. Although Marcia's real name is traceable through any of the newspaper articles written on her, I did not feel the need to single her out in this text by using her real name.

⁴Later, Fine (1990) goes on to critique this notion, showing that schools practice educational exclusion in the name of the common good.

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