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To cite this article: Connie Wun (2018) Angered: Black and non-Black girls of color at the intersections of violence and school discipline in the United States, Race Ethnicity and Education, 21:4, 423-437, DOI: 10.1080/13613324.2016.1248829

To link to this article: https://doi.org/10.1080/13613324.2016.1248829

Published online: 04 Nov 2016.
Angered: Black and non-Black girls of color at the intersections of violence and school discipline in the United States

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ABSTRACT
While most research examining school discipline policies have focused on the experiences of boys of color, this article explores the relationship between violence and school discipline as they shape the lives of girls of color and their disciplinary records. Using in-depth interviews, this article re-narrates the experiences of Black and non-Black girls of color who have discipline records to explore their experiences. The author found that in addition to being subject to multiple, intersecting forms of violence outside of school, girls of color – particularly Black girls – are also subject to schools as sites of control that elicit their anger and resistance. This author contends that faculty should establish new ways of understanding Black and non-Black girls of color by accounting for the ways that intersectional violence shapes the girls’ lives and supports their ‘anger’, agency and resistance to violence.

Introduction
In the past few years, US public schools, specifically those serving poor working-class students of color, have come under scrutiny for their over-reliance upon harsh disciplinary policies. These policies, identified as ‘zero tolerance’ discipline practices, include arrests, suspensions and expulsions. School discipline researchers have found that Black and Latino students are more likely to be disciplined with these exclusionary zero tolerance practices than their white counterparts (Fenning and Rose 2007; Skiba 2002). Most research on these discipline policies and their effects have necessarily focused on the experiences of boys of color (Ferguson 2001; Nasir et al. 2013; Noguera 2008). Beyond academic research, federal and state policies have been created to specifically support boys of color who are disproportionately affected by harsh school discipline policies. Projects such as the federal government’s recent initiative called ‘My Brother’s Keeper’ and state-based projects including the Young Men's Initiative in New York City have been created purportedly to address the academic, personal and disciplinary needs of boys of color. While these studies and research initiatives have established critical attention toward the needs of boys of color, there is a growing need to also attend to the experiences and needs of girls of color, specifically Black girls – who are overrepresented in school discipline data (Crenshaw, Ocen, and Nanda 2014).

As Black feminists and other feminists of color have argued, frameworks that exclusively examine the experiences of men and boys of color (or white women) invisibilize the particular experiences of women and girls color (Evans-Winters 2005; Moraga and Anzaldúa 1981). These experiences,
specifically for girls from low-income backgrounds living in poor communities are often fraught with layered and intersecting forms of structural, institutional and interpersonal violence (Crenshaw 1997; Jones 2010; Richie 1996). This article contributes to existing school discipline research by re-narrating and providing an analysis of the experiences that Black and non-Black girls of color have with discipline. Findings from this research also highlight the ways that school discipline policies do not consider the complex lives of girls of color, including the ways that intersectional violence plays out in their lives, but instead criminalizes and punishes them.

**Discipline literature**

According to school discipline research, students of color are disproportionately affected by harsh school discipline policies (Losen and Gillespie 2012; Wallace et al. 2008). Reasons for these disparities range from macro-level racial, social economic trends to micro-level school and classroom biases. Research shows that racial climates in schools, including the relationships between adults and students, affect suspension rates (Meiners and Winn 2010; Nasir et al. 2013). Most gender-based school discipline research narrows in on the experiences of boys of color (Ferguson 2001; Heitzeg 2009; Noguera 2008; Rios 2011). For instance, Ferguson (2001) found through her research in an elementary school that stereotypes of Black criminality were significant factors in who and how Black boys were punished at school. She found that Black boys were more likely to get into trouble for behaviors that were seen as permissible when committed by their white peers. Similarly, in Rios’ (2011) ethnographic study of East Oakland, Black and Latino teenage boys were regularly policed and criminalized in schools and their neighborhoods. In both studies, the boys were subject to perpetual surveillance based upon racialized suspicions of their potential or inherent criminality. These studies have helped to highlight the underlying problems related to the disproportionate rates by which boys of color are disciplined.

Increasingly, studies have also examined the experiences and logics behind the overrepresentation of Black girls in discipline data (Crenshaw, Ocen, and Nanda 2014; Morris 2012; Wun 2014, 2016). According to the US Department of Education Office for Civil Rights (2013), from 2011 to 2012, Black girls in public elementary and secondary schools across the nation were suspended at a rate of 12%, compared to the rate of 2% for white girls. Black girls were suspended more than girls of any other race or ethnicity and more than white and Asian boys.

Studies that examine girls’ experiences suggest that girls of color are being disciplined for reasons that differ from their male peers. In particular, girls are more likely to be disciplined for failing to meet dominant cis-gendered expectations of femininity (Sharma 2010). Black girls, in particular, are more likely to be disciplined for ‘talking back’ (Henry 1998) and being ‘unladylike’ (Morris 2007). Black girls are also likely to be arrested for being ‘disrespectful’ and ‘uncontrollable’ (Morris 2012). The characterizations and subsequent disciplinary actions are characterized by underlying racial stereotypes and assumptions about appropriate behaviors, which often indicate that girls are expected to be obedient and docile. At the same time that girls are being disciplined for reasons that differ from their male counterparts, studies also suggest that girls of color are being increasingly criminalized and heavily policed in similar ways to boys (Chesney-Lind and Jones 2010). That is, in addition to experiencing their own gender-specific forms of policing, the girls experience what boys do as well. According to another study conducted by the African American Policy Forum and the Center for Intersectionality and Social Policy Studies at Columbia University (2014), which examined Black girls’ experiences with school discipline in Boston and New York, 12% of Black girls across the city’s public schools had been suspended in 2013 compared to 2% of their white peers. The study also found that 90% of girls expelled from New York Schools in 2011–2012 were Black, while none of the girls expelled were white. Black teenage girls represent less than 17% of all female students, they account for 31% of school children referred to law enforcement and 43% of girls who experience school-related arrests.

With the development of zero tolerance policies, girls are more likely to be arrested for assaults than they were before the mandates were enacted. ‘In decades past, this violence would have been ignored or labeled a status offense, like being ‘incorrigible’ or a person in need of supervision. Now, an arrest
for assault is made' (Chesney-Lind and Jones 2010, 60). In addition to experiencing criminalization, the girls are also subject to violence outside of school. According to research, schools are criminalizing and arresting girls who have histories of violence at home (Chesney-Lind 1997; Sharma 2010).

In research that focuses on adult women, according to a study by Green (2005), 98% of women in a jail study were exposed to a traumatic event. Ninety percent of the women reported at least one interpersonal trauma and 71% were exposed to domestic violence. National statistics demonstrate that 85% of young women in detention have experienced sexual or emotional abuse before incarceration (Krisberg 2005). Many female prisoners have experienced various forms of violence, not limited to sexual assault or domestic violence (Chesney-Lind 2004; Richie 1996) and many are from low-income families and communities (Alleyne 2006; Moe and Ferraro 2006).

In her qualitative study of a theater program in a girls’ detention center, Winn (2010) identifies the complex worlds that the girls were forced to navigate through prior to their incarceration. She interviews students and explores the manuscripts that students write for the theater program. Noticing that the plays were often autobiographical, she finds that incarcerated girls’ lives are characterized by intersectional stories of sexual and domestic violence; school and parental neglect; poverty and racism. By situating the students’ narratives and their experiences in the wider contexts in which they live, Winn demonstrates that the girls are multiply marginalized (Crenshaw 1997) and consistently criminalized for the ways in which they navigate through structural inequalities.

In a qualitative study of girls and boys from St. Louis, Missouri, Miller (2008) examines reasons behind Black girls’ experiences with violence in their communities, school and neighborhood. Based upon in-depth interviews, surveys and neighborhood observations, Miller finds that violence against Black girls in St. Louis is shaped by the intersections of normative gender expectations – for both girls and boys – and the effects of structural disadvantages on their neighborhoods and schools. Her study shows that the girls are constantly navigating through the effects of racialized gender expectations of Black masculinity. As boys make unwanted sexual advances, the girls are forced to ‘stand up’ for themselves. Throughout her study, she provides evidence that the girls do not passively acquiesce to gender-based violence, but instead resist the violence against them.

Most studies that examine school discipline data and the impact on females have found that girls of color, particularly Black girls, are disproportionately disciplined compared to their peers (Mendez and Knopf 2003; Morris 2007). Findings show that Black girls are disciplined for behaviors such as disruption, profanity, defiance and fighting. Many of these infractions are subjective, and violation is determined by the opinions of school teachers and administrators. Literature that has evaluated the effects of the ‘school to prison pipeline’ on girls has also examined their histories with violence (Simkins et al. 2004). The findings from the Simkins et al. (2004) study, which interviewed incarcerated girls and adult women with criminal records, indicate that schools have failed to provide adequate services to young women with violent personal lives. Most schools have not only failed to address the girls’ needs but also punished them for acting out in response to the violence in their lives. At times, girls of color, specifically Black girls, can be susceptible to discipline policies regardless of their behaviors (Wun 2014). Drawing from research that examines the relationship between girls of color, violence, and criminalization, this article explores the narratives of girls of color who have discipline records to understand the conditions that shape their disciplinary experiences at school.

**Theoretical framework**

Black feminist scholars and other non-Black feminists of color argue that the experiences and insights of women (and girls) of color, especially Black women, have historically been excluded from popular and academic discourses (Hill-Collins 2000; James and Sharpley-Whiting 2000). These frameworks guide this project precisely for their emphasis on the invisibilized experiences of women and girls of color, and Black girls/women in particular. Black feminist research has demonstrated that in order to thoroughly understand social and institutional inequalities, researchers must examine the lives of women (of all ages) who live at the interstices of multiple marginalities (Crenshaw 1997; Moraga and
Anzaldua 1981; Richie 1996). These multiple marginalities are constitutive of identities and experiences that are based upon race, class, gender, and sexuality. Living at the intersections of these identities and experiences includes being subject to multiple forms of violence. Given this, Black and non-Black feminist of color scholarship theorizes that focusing on the experiences of women and girls of color helps to identify and subsequently challenge the overlapping and constitutive connections between interpersonal, institutional, and structural forms of violence (Crenshaw 1997). School discipline literature that has focused on boys of color has helped to rightfully frame discipline as a racial inequality. However, narrowly identifying racial inequalities as the underlying premise behind discipline disparities misses opportunities to examine the ways that gender-based forms of violence such as sexual violence affect disciplinary experiences.

Additionally, Black and non-Black feminists of color scholarship situate interpersonal violence within the context of white supremacist/anti-Black, settler colonial, anti-poor, and xenophobic heteropatriarchy (James and Sharpley-Whiting 2000). These feminist scholars and activists contend that interpersonal violence, especially against women and girls of color, is both an outgrowth and reflection of structural forms of violence. According to the webpage, ‘Dangerous Intersections,’ from INCITE! Women, Gender Non-Conforming and Trans People of Color Against Violence, ‘… sexual and domestic violence has become internalized within communities of color as a result of this […] colonization.’ In other words, structural violence (including sexism and poverty) influences, if not creates, the conditions for interpersonal violence specifically against women and girls of color. While scholars and practitioners have supported discipline policies under the pretense that they help to manage interpersonal violence between youth (Arum 2003), Black and non-Black feminist of color scholarships provides a framework to better understand interpersonal violence, particularly between girls.

Additionally, feminist of color scholars and activists argue that in addition to interpersonal violence, women and girls of color are subject to other forms of violence, including state violence (James 1996; Richie 1996; Roberts 2012). These scholars challenge traditional researchers and activists to rethink, expand and denaturalize their understanding of ‘violence.’ In particular, according to James (1996), analyzing violence – specifically against Black women – requires a close examination of the role that the state and its institutions play in producing narratives of what constitutes violence and enacting violence in women’s lives. Radical Black feminism specifically highlights the state, its institutions (i.e. schools, prisons, foster care system), policies and practices as violent apparatuses that have simultaneously failed to provide support for Black and poor non-Black communities of color while serving to punish them (Crenshaw 2012). Within a neoliberal context, which favors criminalization and incarceration over social welfare services and policies, Black and non-Black feminist scholars contend that support for discipline reforms is a necessary shift in social and political priorities (Roberts 2012; Wun 2014). Richie (2012) writes in Arrested Justice that these state institutions operate symbiotically to criminalize and punish poor women of color and Black women, in particular.

Black and non-Black feminism also helps to challenge school discipline literature that has relied on a Foucauldian approach to examine school discipline (James 1996; Noguera 2003; Wun 2014). In Discipline and Punish, Foucault (1977) traced the political history of punishment and disciplinary systems, arguing that ‘disciplinary power,’ which in part is characterized by institutions that invoke internalized forms of policing, replaced corporal punishment as a form of state rule and social control. Through panopticon structures such as prisons and schools, individuals learn to internalize dominant norms of ‘docility’ and obedience. In her critique of Foucault, James (1996) argues that Discipline and Punish does not account for the ways that Black bodies continue to experience corporal punishment (e.g. police violence) and are structurally positioned outside of ‘normality’ (27). Panopticon structures and their attending disciplinary mechanisms, which produce and reward normal subjects, may demand docility from Black bodies, but the latter are subject to punishment regardless of their ability to internalize dominant standards. She contends that Foucault’s theory of Discipline and Punish excludes racialized and gendered bodies that permanently occupy the position of the ‘deviant’ subject. James argues that Black bodies are structurally positioned outside of the logic or realm of ‘normality,’ thus
rendering them perpetually and structurally vulnerable to violence and punishment. This lens enables this study to better understand the girls’ experiences with violence and school discipline.

Informed by these theories, this article focuses on Black and non-Black girls of color who have discipline records, particularly because they have traditionally been marginalized from educational research and school discipline studies. It focuses on their experiences with intersectional violence as they relate to the girls’ disciplinary records. Black and non-Black feminist theories enable this project to identify the relationship that school discipline polices and the culture of punishment has with the violence in the lives of girls of color.

Method

This qualitative study includes in-depth interviews and participant observation conducted at Foundations High School (FHS) in California.\(^1\) During the 2013–2014 school year, the population was 41% Asian and Pacific Islander; 32% Latino, 7.8% white, 9% Black, 4% Native Hawaiian or Pacific Islander, and less than 1% Native American. According to school data, Black students made up 33% percent of all suspensions and 27% of expulsions. Latino students were 39% of all suspensions and 53% percent of expulsions. White students made up 8% of suspensions and 0% of expulsions. Asian students made up 9% of suspensions and 0% of the expulsions, although Filipinos constituted 7% of the suspensions and nearly 7% percent of the expulsions. ‘Other’ students made up 4% of suspensions and 13% of expulsions.

FHS is one of the largest and most diverse high schools in the United States. According to preliminary research conducted in 2012, some of the students travel from major urban areas to attend this school for a ‘better education.’ Some of the students purportedly travel for 1 h on public transportation to get school. The school is renowned for its extracurricular activities, exceptional faculty, educational programs and alumni.

This article focuses on the data collected from participant observation and in-depth interviews of six girls of color who have school discipline records. Using purposive sampling (Patton 1990), this study interviewed girls who had discipline records (i.e. suspensions or referrals). One of the school administrators generated a list of names of girls who had discipline records for the second half of the 2012–2013 school year and the first half of the 2013–2014 school year. In 2012, the author conducted a pilot study at the site. As a result, administrators, teachers and other staff were familiar with the author's presence on campus. The girls who participated in the study self-identified as girls of color with discipline record, attended the initial recruitment meeting, returned their consent form, parent permission slip and returned for the interview. I chose to focus on six of the 20 girls of color who were interviewed because their narratives were reflective of their peers’ experiences. The participants included one Mexican-American girl and five Black girls who provided critical perspectives into their experiences with school discipline, including their ideas about the underlying causes for their penalization. Their ages ranged from 15 to 18 years. Each interview lasted between 60–90 min. The interview protocol focused on how students understood their experiences with school discipline policies.

Research positionality

As a cis-gendered Vietnamese-American woman, I employed a reflexive research approach to develop relationships with respondents for the purpose of ensuring that my perspective was not imposed upon the girls (Burawoy 1998; Marshall 1999). Reflexive research requires that the researcher reflect upon his/her opinion to study participants and how s/he may affect responses to questions. Given this, I recognize myself as an ‘inside’ and ‘outside’ researcher. As an ‘inside’ researcher who identifies as a non-Black woman of color, there are a number of assets that help facilitate this collaborative approach to empirical research and policy analysis. First, as a teacher who has had various experiences working with girls of color, I was particularly sensitive and invested in ensuring that students’ stories were appropriately conveyed. Second, my previous experiences of volunteering with young survivors
of sexual assault equipped me with the tools that were necessary to build a rapport with vulnerable populations in ways that were sensitive to their stories and enabled them to share intimate details about their experiences and perspectives.

Although I identify as a woman of color, I recognize that my experiences as a Vietnamese-American differ from those of my respondents who are Latina and Black girls of color. In this capacity as an ‘outside’ researcher, my abilities to potentially use experiential knowledge as a resource for interpreting the experiences of Latinas and Black girls are limited. In particular, as a non-Black woman of color who studies the structure of anti-Blackness as a set of ideologies, political and libidinal economies, and practices that shape institutional policies and lived experiences (Wun 2016), I am also aware that my analyses of the narratives may be unconsciously anti-Black and I am constantly challenged to reflect upon my interpretations of students’ narratives. In order to minimize potential biases, I used a reflexive approach throughout my research. I reflected upon my relationship with respondents, including the ‘commonalities and tensions that emerge[d]’ (Milner 2007). This process included the constant examination of potential biases while refraining from imposing my perspectives onto students. It also included crosschecking my analyses with colleagues who are also familiar with race and gender studies.

Findings

The first section of this paper highlights the girls’ experiences with structural violence – particularly poverty and gendered violence – as they relate to the girls’ behaviors and disciplinary records. As Evans-Winters (2005) explains, the conditions that girls of color, particularly Black girls, experience outside of school impact their experiences in school. School discipline policies, the narratives reveal, fail to address the contexts and experiences that compel students to become angry and enact their rage. At the same time, discipline policies and practices perform the role of decontextualizing and depoliticizing the girls’ behaviors by identifying them as individual problems. As an effect, discourses surrounding educational reform, school discipline or anti-violence risk are limited to finding ways to manage students’ behaviors instead of creating demands for structural changes to social inequalities.

The second section examines the girls’ narratives regarding their experiences inside of school that influence their interactions with school authorities, peers and themselves. Based upon the girls’ narratives, schools were an added space of violence for them. The girls’ ‘behavioral problem,’ as the narratives suggest, are forms of resistance to the school’s expectations that they are to be docile students (Evans-Winters 2005; Foucault 1977). Through the girls’ narratives, the study finds that Black and non-Black girls of color with discipline records – like those with criminal justice records – are often victims of violence. Their experiences with interpersonal violence intersect and are informed by the structural forms of violence – poverty, patriarchy and sexism. While the girls are being forced to manage these experiences with intersectional violence, they have the added dimension of violence experienced from school authorities. The girls share narratives of being criminalized, brutalized and controlled. The article argues that by defining the girls as problems, structural forms of violence including violence from school authorities are obscured in favor of disciplining and punishing the girls.

Responding to structural violence and interpersonal violence

Poverty

Jesika, a 15-year-old Mexican-American girl in the 9th grade, was referred to me by her high school counselor, a Filipina-American woman who was aware that Jesika had an extensive discipline record. When Jesika was called into the initial meeting with me, I explained one of the purposes of the study, which was to understand the experiences that girls had with school discipline. She was almost immediately forthcoming with information about her discipline record. While she did not remember how many referrals she had been given since she started high school, she was able to recall that they were often for ‘disobedience’ and that she had been suspended for fighting and ‘bullying.’
Reflecting upon the reasons behind her referrals, Jesika’s narrative suggests that she often got into trouble for two main reasons. Firstly, she identified that she did not trust school authorities. According to her, trust was associated with respect. While adults demanded that students automatically respect them, she believed that they needed to earn her respect by demonstrating that they ‘know what’s up.’ This meant that they could identify or empathize with her experiences as a Mexican-American who grew up with poverty and violence. Both of which, she shared, informed a brewing anger that was often with her.

Jesika: [My] mom would ask me like … why am I like this? I’m hella angry … I don’t know. Cuz at the time, it was just like my mom … and she was like hella struggling. Like by like paying bills and just … and just … I would see her paying bills, getting drunk and errything cuz she’s like depressed. She’s like struggling off the bills … So she would like, go to like bars, go drink … and … all this kinda stuff … so I would just go out with my friends.

C: How did you know your mom was depressed?

Jesika: Because I could see it on her face and she would cry cuz she didn’t know like … if she was gonna be able to pay rent, she would have to get advances and all that.

Jesika mentioned that she often felt helpless witnessing her mother’s financial and emotional struggles. The material conditions and emotional effects impacted her relationships at school. In particular, she admitted to looking for outlets for her upset and feelings of helplessness. Often, she chose girls who ‘looked innocent.’ These were the girls who she imagined did not grow up like her. ‘I bullied them,’ she confesses. She projected her fantasies of innocence onto these girls. Innocent girls did not ‘know what’s up.’ They did not have to witness or experience being poor or watching their mothers struggle to pay the bills. Bullying became an unconscious enactment of her anger and a means by which she could assert power over someone while struggling with her own helplessness.

Instead of addressing the systemic conditions of poverty that affected Jesika and her mother, school discipline policies and practices often identified her as the problem. Her anger and her enactments of anger warranted punishment. However, by characterizing her as the problem or her behaviors as ‘defiance’ and ‘disobedience,’ school officials missed opportunities to better understand the underlying causes of her behaviors. At the same time, they created a dynamic by which she became increasingly disaffected by the school and its officials. She explained that teachers and administrators rarely asked her about why she thought she was getting into trouble. Their failures to understand her and to correctly identify the factors that shaped her behaviors confirmed her distrust of school authorities that she felt were more interested in her outbursts and punishing her for them.

Charmaine, a 14-year-old Black girl in the 9th grade, explained that her discipline record was a result of several underlying reasons; one of which was the fact that teachers did not understand students’ experiences with poverty. When asked why she thought girls got into trouble, she explained that there were circumstances outside of school that affected students. She commented, ‘Sometimes things happen outside of school. Like me.’ She hoped that if teachers understood students’ experiences outside of school, they would have more empathy for their students.

There are five of us. Sometimes my mom doesn’t eat so the rest of us can eat. Sometimes I don’t eat so the little ones can eat. He [a teacher] doesn’t know that sometimes I have to walk one or two hours to school because my mom’s car broke down. He doesn’t know these things. They don’t see these things.

She believed that if teachers saw and understood her realities, they would be more forgiving. During an observation of her study skills class, I observed Charmaine yell across the classroom to share food with her classmates. Her teacher, a Black woman, did not admonish Charmaine for sharing food, but did ask her to lower her voice. She also asked if Charmaine needed to take a stretch to get some water in order for her to calm down. According to Charmaine, this teacher also recently collected shoes and clothes for her. The more empathic approaches to addressing Charmaine’s behavioral concerns were less about managing the classroom and more about demonstrating care and concern for her. In other words, an empathic approach was more effective than the punitive ones. Charmaine explained that providing her with opportunities to calm down helped her to stay in class and be more engaged in the classroom.
Jesika and Charmaine share intimate details about their experiences outside of school that affect their discipline records. In each of their narratives, they tell stories about how most school faculty members missed opportunities or refused to embrace the girls’ complex stories of struggling with poverty.

**Gender violence, interpersonal violence**

In studies on violence and its effects on girls of color particularly from low-income communities, scholars suggest that the girls are often forced to navigate through multiple forms of interpersonal violence including sexual and domestic violence (Jones 2010; Schaffner 2006). These girls are often in positions to create effective responses to violence and threats of violence from boys and men. At times, the girls employ violence as a way to deter and defend against violence. In showing that they are able to fight, the girls are demonstrating their abilities to protect themselves. According to three of the girls in this study, they ‘act out’ because of the violence they experience outside of school. Differently from Jones’ (2010) research, one of the girls from the study explained that her uses of violence were not only about defending herself from others, but were enactments of her own experiences with pain.

Jesika shared that in addition to bullying innocent girls, one of the reasons she fought was because at some level, she ‘liked pain.’ She had become accustomed to pain because of her experiences with her father, a working class Mexican-American. During our interview, she shared that her father was extremely punitive and ‘hella strict.’

C: What do you mean?

Jesika: Like … he would always make me clean the house. He would just like make me be like … a little servant. Like you know, clean and if I didn’t do it right, he would like, hit me. And … you know …

C: You mean like a spanking?

Jesika: Like a biiiiig spanking. I would have to … He would put me in a room, get the belt and he would like sometimes wet it and he will just like … make me like [indicates that she had to kneel] … go and like [hands are spread wide] … how do I explain it … the bed’s right here and then I would just kneel down and like if I’m praying, he’ll just hit me like that. And then um … I don’t like … since I’m older now, like … now I know not to let nobody touch me and like … if somebody hits me, it doesn’t really hurt me, like you know … I was used to being hit by my dad. So you know like … I like pain.

Her relationship with pain and violence, her narrative explains, is related to her experience with her patriarchal violence.

As feminist of color literature has argued, many women of color – often depending upon their gendered presentation or embodiment (for example: as cis or trans), class, ethnicity, and sexuality are subject to different forms of violence (Ferguson 2001; Roberts 2012; Wun 2014). These experiences with violence, which include interpersonal violence between family members and partners, are related to structural conditions that, more often than not, position poor working class women and girls of color in vulnerable and defensive positions (Richie 1996). In relation to this, Jesika’s experience with violence at the hands of her Mexican-American father and her resultant history with violence is enacted upon her peers. She explains, ‘Cuz I have so much anger and so much and hate and errything … that I just take it out on girls … that … yeah. I don’t know.’ According to her narrative, her experiences with patriarchal violence and responses to them were enacted onto ‘innocent’ girls.

Similarly, Stacy, a 15-year-old Black girl in the 10th grade, had been suspended twice for fighting and according to her, has multiple referrals for ‘disobedience.’ While she was critical of the referrals for ‘disobedience’ stating that sometimes teachers are racially biased against her, she explained that her fights stemmed from anger around the violence she experienced outside of school. Thus, Stacy identified her teachers’ racism and her anger at experiences with domestic violence as explanations for her discipline record.

Stacy explained, ‘I have a lot of anger.’ According to her, the anger is from attempting to balance complex dynamics at home where she experienced and witnessed domestic violence.
Stacy: We've been having problems at home ... now we tryna see where I can stay ... I don't stay at home ... [but] my momma doesn't want me stay with my granny [in Louisiana], just finish out school out there ... cuz I don't get along with her baby daddy ...

C: Why don't you get along with him?

Stacy: Sometimes he picks arguments ... sometimes I be having arguments. Night before last, we got into an argument, cuz he pushed me. I told the counselor. She had to file a complaint ... I don't tell people anymore ... I keep stuff in ...

She also has experiences with living in a domestic shelter. These experiences, she explained, affect her and can cause the feelings of anger that sometimes erupt in school when she becomes intolerant of her classmates. Research shows that children who have been exposed to domestic violence are more likely than other children to demonstrate 'aggressive' behavior or be depressed and anxious (Brown and Bzostek 2003). Stacy shared that she has been told she has anger problems and has been referred for anger management. However, the programs, which are primarily conducted within group settings, have failed to help alleviate her anger.

Similarly, Charmaine shared that she also had experiences with sexual violence. She tells me, 'I was kidnapped and forced into prostitution.'

I got off the bus [on Park St. in Oakland] because it doesn't go up the hill and was going to walk to my friend's house. I was trying to call her but I dropped my phone. Someone grabbed me and threw me into a van. Next thing I know, I was in a hotel with a bunch of other girls.

She showed the scars on her arm from where her kidnappers apparently burned her.

When asked to provide more details about what happened, she said,

Charmaine: I worked in ... LA, Nevada, Reno, Vegas, a lot of places, Oakland, San Jose, Hayward, San Leandro ... uh ... that's it.

C: How'd you get there?

Charmaine: The pimps would drive us.

C: How many girls?

Charmaine: About 10.

C: How old were they.

Charmaine: There was me, 18, 19, 20, 21 ...

I had multiple pimps. I ran away a couple [sic] times.

She expressed that the experience of being 'kidnapped,' and 'pimped' affected her behaviors at school. Yet, these experiences with violence were not factored into the disciplinary decisions. She had been given referrals for 'disobedience,' and 'disruption.' She had a difficult time focusing in school, following directions, listening and getting to school. Complaining that she often had a lot on her mind, Charmaine was also keenly aware that one of her white male teachers did not support her, despite her experiences. One of her white male teachers gave her a referral for refusing to obey his rules despite knowing her history. These experiences of punishment coupled with neglect worsened Charmaine's experiences at school. She eventually dropped out of school before the study was completed.

Based upon these student narratives, girls with discipline records are penalized for how they respond to the extenuating and violent circumstances that shape their lives. Their ways of navigating through the effects of poverty includes enacting their anger. For these girls, school discipline policies and practices did little to support them as they navigated through poverty, sexual and domestic violence outside of school. Instead of recognizing and subsequently addressing the causes of students' anger, which could often be traced to the different forms of violence that they experienced outside of school and inside of school, school officials and authorities were more inclined to exclude and punish the girls. In this sense, while the girls were being disciplined and punished for their behaviors, the violence that may have propelled the girls to act out in school remained.
According to the girls’ narratives, not only were they being subject to violence outside of school, the girls were vulnerable to violence from school authorities including police officers, administrators, and teachers. Their experiences with these layers of violence indicate that school policies did not only obscure the experiences of violence that affected the girls’ behaviors at school, but that schools were sites of violence as well.

School discipline as state violence

While research has looked at the ways that boys of color have been brutalized by police officers or criminalized, one student in the study – Stacy – shared a story about her own experiences with police brutality. In 2013, Stacy was threatened with arrest by the campus police officer for attempting to fight a classmate at a nearby parking lot. Purportedly, as a means to preempt the fight, the police officer confronted Stacy and ‘pushed and handcuffed’ her. She explained, ‘I was so confused. I couldn’t do nothing about it … He was pushing me. I asked why I had handcuffs on me …’ She recalled asking the police officer to take off the handcuffs because, ‘[He was] making me look like I’m a criminal.’ During the attempted arrest, she remembered that there were, ‘ten cop cars and dogs,’ and that the officer, ‘threatened to throw my face to the ground.’ She claimed, ‘It made me not like the police even more than I do now.’ Her experience highlights that Black girls are also subject to school police violence similarly to their Black male peers (Rios 2011). This experience with police brutality, the girls shared, is only part and parcel of the experiences that the girls navigate through at school.

Michaela, a Black girl in the 12th grade, shared that she had received up to 7 referrals during her time at the school. Like many of the girls in the study, her referrals were for defiance. Michaela defined the infractions as ‘smart comments’ or for ‘talking back.’

C: How many referrals have you gotten since you’ve been here?
Michaela: (pause) Maybe 7.
C: What are your referrals for?
Michaela: Being disrespectful maybe. Making smart comments.
C: What are smart comments?
Michaela: It’s making smart comments, like responding in a way that you know is kinda rude (sigh), I can’t explain it.
C: You get in trouble for making smart comments?
Michaela: Well, I don’t think I should have. I just thought the comment was intelligent to say (chuckles).

Studies suggest that girls of color, specifically Black girls, are more inclined to get into trouble for subjective offenses (Morris 2007). Black girls are more likely to face disciplinary consequences for ‘being too loud’ or disrespecting authority. According to Michaela, her experiences with referrals are for statements that were considered rude or disrespectful to authority figures. She would get referrals for talking back or making sharp comments that offended adults. According to her narrative, smart comments can be construed as attempts to undermine authority. As a Black girl, she is perpetually policed and punished for seemingly challenging authority. Based upon James’ (1996) analysis of racialized policing, white bodies individuals are less likely to be policed than non-whites because their bodies are more reflective of dominant ideals. She writes,

[D]ifferent bodies are expected and are therefore required to behave differently under state or police gaze. Greater obedience is demanded from those whose physical difference marks them as aberrational, offensive, or threatening, appear more docile than others because of their conformity in appearance to idealized models of class, color, and sex; their bodies are allowed greater leeway to be self-policing or policed without physical force. To illustrate: a white male executive in an Armani suit is considered more docile, civilized, and in need of less invasive coercive policing than a black male youth in a hooded sweatshirt and off-the-hip baggy jeans. (26)
Similar to Black boys who are often policed because their bodies do not conform to ‘idealized models,’ Michaela’s narrative suggests she is constantly being policed and punished for menial transgressions which are sometimes subjectively determined as problems. In the following narrative, Michaela shares that she was punished for purportedly disrespecting a school police officer by calling her a ‘rent a cop.’ Rent a cop is a pejorative term used to accuse police officers or security guards of carrying minimal authority. The police officer responded by calling her over in front of her peers, giving her a referral for defiance, and punishing her with a week of detention.

The last time I got a referral was from a cop because I was being disrespectful. I was sitting down with a group of friends. I didn’t say anything. They did. The CST [campus security technician] thought I made a smart comment. Her and the cop thought I was saying something disrespectful. [But] I wasn’t saying anything. They was calling her a “rent-a-cop”. One boy was making a rap about [the cop]. Cuz he got arrested by her once. Everybody had something to say. I was just laughing about the whole situation. [The cop] said I said something. I didn’t. But whatever. I got lunch detention for like a week.

Importantly, insulting or ridiculing school personnel is not formally recognized as a disciplinary transgression. However, as a student who is institutionally recognized as an inferior subject to school authorities, she is vulnerable to their disciplinary discretions. Regardless of her protest against the subjectively determined infraction, she spent a week in detention. According to Michaela, she was undeterred by the punishment. Instead, she felt more resentment toward the school system and the police. Although lunch detention may not be considered a major consequence, however, punishing a student for purportedly insulting an adult reinforces her position as a subjugated subject and authorizes the former with the power to define infractions and punish at their discretion. In this situation, she has little or no defense when confronted by an adult’s accusation of disrespect. According to James’ (1996) analysis, the underlying logic behind excessively punishing Michaela was that ‘greater obedience’ was demanded of her.

**Conclusion**

According to the students, discipline policies penalize students for the anger caused by experiences with multiple intersecting forms of violence. Outside of school, the girls are navigating the effects of poverty and domestic and sexual violence. As the girls respond, their behaviors are characterized by school policies as ‘disobedience’ and ‘defiance.’ The violence that girls of color experience outside of school and the antagonizing conditions inside of school constitute a ‘condition of confinement’ for them. The girls believe that their teachers are not aware of their experiences outside of school and that they lack sensitivity or care for the girls. Instead, the girls felt targeted for punishment and neglect. Discipline policies and their alternatives do not address these underlying structural concerns. Instead of addressing the larger structures and conditions that affect the girls’ behaviors, students are being disciplined or recommended for anger management courses. These approaches not only punish the girls, but also obscure the role that larger constructs – poverty, gender violence – play in affecting these girls’ lives and their coping mechanisms (Bierria 2014). Bierria (2014) contends that because women of color, particularly Black women, are subject to multiple forms of subjugation, they enact forms of ‘agencies’ that are considered ‘criminal.’ Girls of color who question authority and decide to listen only to adults who have earned their trust are considered defiant. Instead of supporting girls, they are characterized as problems by teachers. I argue that girls who get into trouble are attempting to navigate through their conflicting positions at home and school. While they have experiences that may force them into adulthood (i.e. taking care of siblings and multiple forms of violence), they are infantilized at school. These forms of infantilization are a form of ‘social control’ over the girls (Crenshaw 2012). These controlling mechanisms leave the girls feeling over-policed and underserved (Crenshaw 2012). Under the pretense of classroom management, punishing the girls for these subjective offenses are a way that the police attempt to regulate girls’ bodies and their movements.

Not only do the girls experience forms of violence outside of school, they are also attempting to navigate through a complex, layered and dynamic school system. At school, the lessons that they learn
from home are either devalued or criminalized by school policies. Similarly, the girls in the study reveal that the punishment they experience can sometimes go beyond ‘suspensions’ or ‘referrals.’ The range of disciplinary procedures included police brutality to other quotidian forms of punishment. In this study, Stacy revealed that she was arrested and physically harassed by campus police for almost being involved in a fight. Additionally, for Black girls, ‘speaking your mind’ or ‘fighting back’ when threatened were considered violations of school rules. While this does not mean that school authorities were intentionally racially biased or that they intend to criminalize the girls, the effects are still damaging and confining. Girls in the study explain being punished for attempting to defend themselves against teachers and students.

Informed by students’ narratives, I argue that in lieu of punishing the girls, schools should address the larger structural conditions and forms of violence that shape students’ behaviors through creating critical spaces and programs that are led by girls of color. Instead, schools should create spaces for girls of color to share their experiences and subsequently develop youth led projects that will help them to challenge the structures of violence, including the racial biases and violence that they experience at school. A number of non-profit and community-based organizations including Girls for Gender Equity (GGE) in New York City, New York, Radical Monarchs in Oakland, California, and Girls Rock Charleston in Charleston, North Carolina have developed programs and youth participatory action research projects that are led by young cis- and trans- women of color to address girls’ needs for gender-based services, policies and advocacy. Specifically, as an organization that focuses primarily on cis- and trans- girls of color, GGE provides support services as well as trains their participants to conduct participatory action research projects. Their most recent youth-led project evaluated the experiences that girls of color had with school discipline and punishment in New York City. In 2015, the GGE staff and participants also successfully led a research project and youth-led campaign in New York City to lobby their city officials for a Young Women’s Initiative. According to a press release from the New York City Council Speaker, Melissa Mark-Viverito,

“The Young Women’s Initiative was born from women and girls of color demanding inclusion in our nation’s racial justice fight of the twenty-first Century. Our communities will be made whole only when we intentionally address systemic and institutional racism, poverty and sexism while simultaneously creating the conditions for our girls and young women of color [trans and cis] to thrive alongside their brothers. YWI is intergenerational, strategic and visionary. I’m honored to Co-Chair and co-lead another way forward with some of the most intelligent and courageous people in the movement;” said Joanne N. Smith, Young Women’s Initiative Co-Chair and Founder/Executive Director of Girls for Gender Equity.3

The effects of these girl-centered projects helped to empower participants as the girls learn skills in research, data analysis, campaign organizing, and advocacy. Importantly, their work contributed to a citywide initiative geared toward supporting all cis- and trans- girls in the city of New York. The work of community-based centers and organizations like GGE can inform the work of schools and their efforts to support girls of color.

As the students in this study shared, girls of color and their behaviors, when examined within a structural context, are often being penalized and punished for legitimate forms of anger. As noted by Angelou:

If you’re not angry, you’re either a stone or too sick to be angry. You should be angry. You must not be bitter. Bitterness is like cancer. It eats upon the host. It doesn’t do anything to the object of its displeasure. So use that anger. You write it. You paint it. You dance it. You March it. You vote it. You do everything you do everything about it. You talk it. Never stop talking it.4

As Black and non-Black feminists of color have theorized, girls of color exist at the margins such that their anger is often prompted and situated within larger social and political contexts. However, findings from this study show that girls of color are disciplined and punished for their anger and how they navigate through the multiple forms of violence in their lives, including that of which happens at school and from contact with school authorities. In addition to getting into trouble for resisting violence in their lives, girls of color and Black girls in particular are being gratuitously punished (Wun 2014).
However, schools can be critical spaces where adults and programs focus on examining and supporting girls’ multidimensional lives and their emotions, including their rightful anger and resistance to violence. I suggest that schools begin to examine the complexities of girls’ lives by reframing the problem. Instead seeing them as the problem, the girls’ narratives reveal that there are larger problems that may elicit anger, necessitating their agentic assertions and resistance. The girls’ narratives suggest that the problems do not lie with them, but are embedded in the structures and schools that govern their lives.

Notes
1. Foundations High School is a pseudonym. All names have been modified to protect the identity of interviewees.
2. All names used throughout the article are pseudonyms.

Acknowledgments
Special thanks to all students and staff that Foundations High School for sharing and insisting upon their anger, insights, and rights to resist. Thank you to the College of Education at the University of Illinois, Chicago and the Institute for Study of Societal Issues at UC Berkeley. Thank you to Danny Martin, David Stovall, and scholars affiliated with the Research Justice at the Intersections program at Mills College for the valuable feedback on prior drafts. A very special thank you to Vanessa Agard-Jones, Jared Sexton, Alisa Bierria, Damien Sojoyner, Omar Ricks, Tamara Nopper, Maisha Winn, Erica Meiners, Beth Richie, Keith Feldman, Lisa Harewood, Mariame Kaba, Bianca Suarez, Lynette Parker, Tony Platt, and Christine Trost for their intellectual brilliance and guidance. Thank you to Janelle Scott, Na’ilah Nasir, Dylan Rodriguez, and Martin Jay for their ongoing guidance and support. Thank you Girls for Gender Equity (GGE) and the National Organization of Asian Pacific Islanders Ending Sexual Violence (NAPIESV) for their inspiration.

Disclosure statement
No potential conflict of interest was reported by the author.

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