The seen and unseen: How the image of Medusa in art reflects women in law and society

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Abstract

This essay explores the importance of image and visibility within society, and how this equates to representation in the law, by exploring who is visible in art and the evolution of how they are represented. Representation in art is a reflection of representation in society—politically, socially, and legally—and thus representation, being seen, is ultimately linked with having a voice in society. This way of looking at art, and who is seen in art, can be used to trace the evolution of the representation of women and victims of sexual violence throughout history. Through a close study of the image of Medusa and the law during the period in which each image was produced, this essay explores how art reflects changes in our justice and legal systems and addresses women's justice, primarily in relation to sexual assault. The development of Medusa's story in art from Ancient Greece to #MeToo aids in tracking the development of the 'rape narrative' in the legal system. The exploration of this evolution highlights the link between image—the act of being seen by society—and law, and how those who are not given proper representation in art are often not given equal representation before the law.

Introduction

To be a subject of the law, one must be visible to the law. To be abandoned by the law, to live outside of it, is to be invisible to our society. We can understand who is represented in our legal system by studying who, and what, is visible in the art of the period, particularly art representing law and punishment. For example, Klimt's lost piece *Jurisprudence* explores this idea of the relationship between sovereignty and life.[1] The work equates law with punishment and, in the words of Desmond Manderson, often the law does not fail but 'succeeds too well'.[2] Jurisprudence is a dream and dreams cannot be free, or so Manderson argues, and the price of this dream is shame. We see the paying of this price represented through the naked man invaded and corrupted by tentacled law in Klimt's piece.[3] Ironically, *Jurisprudence* is an image filled with women but not about women, despite the issue of anxiety, arguably, applying most strongly to 'women's justice'. For women, there has been a constant shame in being visible to the law, particular in areas such as sexual assault: often, their own villainisation is the price of being seen. Rape accusations are so often heard alongside challenges to women's legitimacy due to their sexuality—in the eyes of a traditionally masculine court and jury, a sexual woman cannot be an innocent one—as seen through various cases such as *R v Evans*, as will be discussed below.[4] These prejudices link back to the typical whore/Madonna dichotomy used to classify women when discussing sexuality; however, these archetypes only allow society to view women through the eyes of men.[5] These lenses show how being 'seen' by the law dictates how you are

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[1] *Jurisprudence*, along with its two accompanying pieces, *Medicine* and *Philosophy*, were seized by Germany in the Second World War and ultimately destroyed by a fire set by German SS forces; Gustav Klimt, *Jurisprudence*, 1900–1907, Austria.

[2] Desmond Manderson, 'Klimt's *Jurisprudence*: Sovereign power and bare life', *Oxford Journal of Legal Studies* 35, no. 3 (2015): 524.

[3] Sigmund Freud, quoted in Ibid.

[4] David Gurnham, 'Ched Evans, rape myths and Medusa's gaze: A story of mirrors and windows', *International Journal of Law in Context* 14, no. 3 (2018): 454–468.

[5] Anne Summers, *Damned whores and God's police: The colonization of women in Australia* (Ringwood: Penguin Books, 1975).

represented, and thus brings us to the importance of art in establishing what these lenses are, how they change, and how these changing perceptions impact our legal system.

Art is a key way through which we can track the evolution of women's justice. By seeing what lenses women are represented through in images, we can gauge how they would be represented under the law. With a few exceptions—notably the image of Lady Justice, who ultimately represents a distinctively male form of justice—women's justice is an area rarely represented in legal artwork and, when done so, is often represented by men. In our example of Klimt's work, women are representations of justice, a violent sovereignty, but do not themselves experience justice, even though they dominate Klimt's painted world. Therefore, we must extend ourselves beyond the work of Klimt to other representations of women in art, to evaluate how their representation—particularly when depicted alongside men—reflects wider attitudes towards women's authority. By extension, this will assist in examining how the law has developed to include women's issues more centrally, as they become more visible in art and society. In order to evaluate this development effectively, we will focus on the image of one woman in particular, whose story could be argued to encapsulate the development of 'sexual assault narratives' across history: Medusa. Representations of Medusa have been used throughout history to both demonise and promote female authority, depending upon the period. In Cellini's sculpture *Perseus with the head of Medusa* (1554), Perseus stands victorious over the recently defeated Medusa: her naked body lies at his feet, her snake-ridden head held in triumph.[6] It is a classic image of male victory and the destruction of the 'female monstrous'. Cellini's rendition is arguably the most well-known interpretation of the myth of Medusa in art, and there have been various versions and reworkings of the piece throughout history.[7] However, it is not the only interpretation. Medusa is an image that has been interpreted and harnessed in a variety of ways: as a monster, a victim, a villain, a femme fatale, but most importantly, as a woman. The image of Medusa has been demonised by male artists but also reclaimed by feminists as a symbol of female power. Her form has been used as political propaganda against female authority, but also as a symbol for sexual abuse survivors and a representation of women's justice. This essay highlights how the law has developed alongside this image, shifting from the demonisation of sexual assault survivors to a feminist representation of survival.

Feminisation of the monster

In order to understand how the image of Medusa has evolved, her original representation in the Ancient Greek myth must be examined alongside the legal status of women in the period. The myth of Medusa was first recorded in full by Ovid's *Metamorphosis* (AD 8).[8] Medusa, a beautiful woman, was raped by Poseidon in Athena's temple and, as punishment, was cursed to turn any man who looked upon her to stone.[9] She then became one of the 'Gorgons of Greece', three snake-haired sisters with various supernatural powers.[10] Later, Perseus was sent to kill Medusa and, aided by Athena, cut off her head and mounted it upon his shield. Due to her monstrous beginnings, early Ancient Greek artists showed Medusa as an almost comic figure; bearded, fanged, with contorted nose, and conventionally hideous.[11] Examples of her monstrous and androgynous figure can be found on terracotta stands from as early at 570 BC.[12] In fact, the majority of monstrous Greek hybrids were depicted as female, as the 'feminisation of monsters served to demonise women'.[13] Women's power becomes monstrous due to its association with the idea of the 'other', with demons and the unnatural.[14] There is no mention of justice for

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[6] Benvenuto Cellini, *Perseus with the head of Medusa*, 1545–1554, bronze, Florence.

[7] Antonio Canova, *Perseus holding Medusa's head*, 1800, marble, Vatican City; Camille Claudel, *Perseus and the Gorgon*, 1905, marble, France.

[8] Ovid, *Metamorphoses*, AD 8.

[9] Mary Beard, *Women and power: A manifesto* (United Kingdom: Profile Books, 2017).

[10] Ovid, *Metamorphoses*.

[11] Abigail Cain, 'What depictions of Medusa say about the way society views powerful women', *Artsy: Visual Culture*, May 20, 2018.

[12] Ergotimos and Kleitias, *Terracotta stand*, ca. 570 BC, terracotta, New York, The Metropolitan Museum of Art.

[13] Kiki Karoglou, *Dangerous beauty: Medusa in classical art* (New York: Metropolitan Museum of Art, 2018), 5.

[14] Jenny Sharpe and Gayatri Chakravorty Spivak, 'A conversation with Gayatri Chakravorty Spivak: Politics and the imagination', *Signs* 28, no. 2 (2003): 609–624.

Medusa's rape and this is, arguably, justified due to her monstrous appearance: she is not considered human and therefore does not deserve to be afforded the human concept of 'justice'. This denial of justice brings us back to the notion that how one is seen is how one is represented in law.

Throughout the fifth and fourth centuries BC, however, Medusa became increasingly feminised, like many other monstrous figures in the Classical era, as evident in various terracotta pottery pieces of the period.[15] Not only is Medusa now portrayed as powerful due to her superhuman abilities, but she is also dangerously sexualised, an early rendition of the femme fatale.[16] Contemporary filmic depictions of Medusa, such as 2010's *Clash of the titans*, still play on this sexualised image whereby Medusa's sexuality itself becomes the most monstrous part of her.[17] Despite her feminisation, however, Medusa is still a 'monster' and her hypersexualisation makes her 'both titillating and terrifying', a threat that 'invites male conquest'.[18] The slaying of this 'hyper-sexualised monster' evokes erotic, masculine notions of war and, in a sense, represents an early form of violent revenge pornography.[19] Rape narratives in Ancient Greece were often told through a male lens—not only in art or poetry, but within a legal framework as well—which explains why assault was often normalised or used to men's benefit.[20] Women in Greece 'could not bring cases … and could not appear before the court or even give evidence in any direct way', thus most accounts of rape were conveyed second-hand.[21] Stories of rape were filtered through a male guardian and often recounted in a way that best suited male interest; consequently, the consent of a woman depended on the agenda of a man. The feminisation of the monster, however, had other benefits for a male-defined society beyond the justification of rape.

Kiki Karoglou argues that this beautification of monsters serves as a method of male control, where 'the monster becomes an ornament'.[22] Even today, these feminised images of Medusa are used by beauty industries—notably Versace, whose logo is the decapitated head of Medusa—that seek to control the perception of women in society, much in the same way as art.[23] In this way, the beautiful Medusa still carries a legacy of male control. In a male-dominated society such as Athens, the control of female sexuality and power was not unusual, and the demonisation of powerful women like Medusa and their deaths aided in that control.[24] Women's use of power in mythology was often destructive and served to justify the exclusion of women in real life.[25] Comparing powerful women to Medusa-like monsters is still a common trend and an image often repeated across social media, as evidenced by the demonisation of high-profile, powerful women such as Angela Merkel and Hilary Clinton. Not only does the monstrous depiction of these women play into the importance of looking/seeing in our society, but their representation in general by male artists adds to a culture of female voicelessness and male violence. Susan Sontag argues there is something 'violent' in representing others through art, a violence that is violating as it turns people into objects of possession.[26] This violation and ability to 'possess people' through art can arguably be characterised by the same basic qualifications as sexual assault. Catharine MacKinnon argues that 'looking, knowing, and fucking' are all associated, since each instance is defined by a male subject seeking 'to dominate the world and the objects (some … being female persons) he finds in it'.[27] The male relationship to power as domination, as explored by both

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[15] Karoglou, *Dangerous beauty*; Attributed to Polygnotos, *Terracotta pelike (jar)*, ca. 450–440 BC, terracotta, New York, The Metropolitan Museum of Art.

[16] Sumi Hansen, 'Dangerous beauty in the ancient world and the age of #MeToo: An interview with curator Kiki Karoglou', *Met Museum*, November 21, 2018, www.metmuseum.org/blogs/now-at-the-met/2018/dangerous-beauty-interview-with-kiki-karoglou.

[17] Louis Leterrier, dir., *Clash of the Titans* (United States: Warner Bros Pictures, 2010), film.

[18] Elizabeth Johnston, '"Let them know that men did this": Medusa, rape and female rivalry in contemporary film and women's writing', in *Bad girls and transgressive women in popular television, fiction, and film*, eds. Julie A. Chappell and Mallory Young (Springer, 2017), 184.

[19] Ibid.

[20] Rosanna Omitowoju, *Rape and the politics of consent in Classical Athens* (Cambridge: Cambridge University Press, 2008), 17.

[21] Ibid.

[22] Hansen, 'Dangerous beauty in the ancient world and the age of #MeToo'.

[23] Ibid.

[24] Ibid.

[25] Beard, *Women and power*.

[26] Susan Sontag, *On photography* (New York: Picador, 1977).

[27] The expression 'fucking' implies heterosexual intercourse that may or may not be consensual. Catharine MacKinnon, quoted in Gurnham, 'Ched Evans, rape myths and Medusa's gaze', 458–459.

Sontag and MacKinnon, is a central characteristic of the male gaze, which holds an unfortunate amount of power in a male-dominated legal system.[28] Thus, if art and male domination are so closely connected, it is clear how the notion of 'seeing' or 'being seen' and how one is looked upon became so intertwined with ideas of justice. Male depictions of female trauma in art, particularly the rape and punishment of Medusa, structure this type of violence into the male perspective, to make it subservient to male subjectivity, sexuality, and explanation to create a culture of female voicelessness.[29]

The voicelessness of women

Representations of Medusa differ to reflect changing attitudes towards powerful women and femininity and how the voices of women are often silenced in the legal sphere and wider society. Medusa represents the voicelessness of women across history and the law, from her visage—lips locked, eyes closed—in Cellini's *Perseus with the head of Medusa* (1554) to her silent scream in Caravaggio's *Medusa* (1567).[30] Medusa's severed head is the wound of powerful women: it is the destruction of her intellect, speech, and compassion. Her abandoned body represents a life unlived, an existence that is now voiceless. As Cixous writes in 'The Laugh of Medusa', 'censor the body and you censor the breath and speech'.[31] Corretti argues that the re-emergence of Medusa imagery during the Renaissance—the period in which Caravaggio worked—was in response to an increase in women's growing political power and a further feminisation of Italy.[32] In this parallel, we see a direct connection to the use of Medusa by men to comment on women's issues and masculine power as expressed through art. Unlike Cellini's sculpture, Caravaggio's painting shows Medusa's head, mid-scream, mounted upon Perseus's shield. The blood and physically terrified features create a much darker image of Medusa's death, and could be argued to present a more sympathetic interpretation of the myth. However, Medusa is still a voice violently cut off, just like Cellini's earlier depiction. Even Medusa's powerful gaze is denied to her in Caravaggio's reimagining, as she faces away from the spectator. [33] Recent legal scholars have explored notions of the visual and the gaze to understand responses to crime.[34] There is evidence of 'no crime' rape reports relying on a traditional, visual narrative; evidence of friendliness before or after the assault or a lack of physical markings may be considered evidence that a complaint was fabricated.[35] The case of *R v Evans*, in which two football players (Evans and MacDonald) were accused of rape, indicates the viewing of victims as inherently sexual removes the sympathy of the judicial system.[36] While Evans was originally convicted, it is the ordering of a retrial by the Court of Appeal that implies the undeniable linkage between innocence/guilt and appearance. The decisive evidence for the retrial was given by Mr Owens, who had a consensual sexual encounter with the woman assaulted (X).[37] Mr Owens was motivated by his view that X did not conform to the image of a rape victim, as she continued to go out and have casual sex 'so soon after the rape'.[38] Mr Owen's statement is compared to 'collective voyeurism' by David Gurnham, as it contained graphic descriptions of X's sexual encounters and preferences.[39] X being *seen* by the justice system as sexual was enough to bring into question the entire assault. We can trace this systematic association of blameworthiness and female sexuality in ideas of criminology as early as nineteenth century.[40] Cesare Lombroso, a prominent nineteenth-century

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[28] Sontag and MacKinnon, quoted in Gurnham, 'Ched Evans, rape myths and Medusa's gaze', 458–459.

[29] Gurnham, 'Ched Evans, rape myths and Medusa's gaze'.

[30] Cathy Ann Diorio, 'The silent scream of Medusa: Restoring, or re-storying, her voice' (PhD thesis, Pacifica Graduate Institute, 2010); Cellini, *Perseus with the head of Medusa*; Michelangelo Caravaggio, *Medusa*, 1567, oil on canvas, Florence.

[31] Hélène Cixous, Keith Cohen, and Paula Cohen, 'The laugh of the Medusa', *Signs* 1, no. 4 (1976): 880.

[32] Christine Corretti, *Cellini's Perseus and Medusa and the Loggia dei Lanzi: Configurations of the body of state (Art and material culture in Medieval and Renaissance Europe)* (Copenhagen: Brill, 2015).

[33] Diorio, 'The silent scream of Medusa', 34.

[34] Gurnham, 'Ched Evans, rape myths and Medusa's gaze'.

[35] Anna Carline and Patricia Easteal, *Shades of grey – Domestic and sexual violence against women* (Abingdon: Routledge, 2014).

[36] Gurnham, 'Ched Evans, rape myths and Medusa's gaze'.

[37] *R v. Evans* (*Chedwyn*), 2016. 4 WLR 169.

[38] Ibid.

[39] Gurnham, 'Ched Evans, rape myths and Medusa's gaze', 456.

[40] Ibid.

criminologist, saw 'exaggerated sexuality' in a woman to mean she was a born 'criminal more terrible than any man'.[41] These continued associations of sexuality with guilt create a culture of voicelessness and silence within our legal systems. Like Medusa, to be sexualised is to be voiceless.

Caravaggio further exploits this voicelessness in his 1567 piece by removing Medusa's own features from her face, depicting instead his own on the lifelike, decapitated form.[42] It is an image concerned with man's struggle with mortality, not with a woman's relationship with power.[43] In his removal of Medusa's face, leaving only her snake-haired curse, Caravaggio effectively removes women's issues from history, leaving only what was given to her by her patriarchal punishment. Medusa's snake hair is the feature most commonly associated with her today: she is defined by a punishment assigned by her masculine society. However, Caravaggio's image—despite being one of the most famous Medusas—is not an image of Medusa at all, but a male appropriation of female punishment. Caravaggio and Cellini appropriate the image of Medusa to showcase male anxieties about women's power in Italy. They, much like the curse and beheading described in Ancient Greek myths, take Medusa's own image away from her, deploying it for patriarchal purposes.

Medusa's voicelessness is paralleled to Athena, who acts as the mouthpiece of the patriarchy.[44] Athena adopts the voice of the patriarchy in order to be heard, but this ultimately still leaves women unheard and unseen. Unlike Medusa's, this form of women's voice is allowed to be represented as Athena, at least in this instance, does not actually represent women. We see this parallel represented in Klimt's *Pallas Athene* (1898), where Athena stands looking directly at the viewer, the head of Medusa on her chest.[45] She is presented with traditional masculine qualities in her sharp, almost geometrical body type and defiant stare, her face hidden behind a helmet, suggesting a distinctly masculine presence. She wears Medusa's head in its original monstrous form—a representation of a lack of feminine voice—as a trophy. Athena is given the power of vision—both to see and be seen—because she represents masculine punishment rather than equal justice. The asexual goddess is given a voice because she is an agent of the patriarchy and, some argue, becomes Klimt's most powerful female figure. The idea that Athena's asexuality gives her power is a continuation of the ideas of Lombroso, as discussed earlier, that sexuality cannot give one power, but rather takes it away, in this nineteenth-century context.[46] As Susan B. Anthony notes, 'women … must echo the sentiments of these men. And if they do not do this, their heads are cut off'.[47] Anthony's statement is an idea true not only in art, as we have seen, but in the sphere of law and society.

The Medusa-fication of women in politics

Medusa's image has long been used in politics to demonise female authority. Even today, society's cultural template for powerful leadership or persons remains overwhelmingly masculine.[48] Beard argues that Classical archetypes can often be used to understand how we represent women today, in contrast to an established male power; in mythology, for example, it often becomes male duty to save civilisation from female power.[49] We see this stem from a culture and history of mythology that is male-centric, as we have seen already from the few images explored above. Like Ancient Greece, images of corrupted female power seek to demonise women into silence. We see examples of this as far back as pre-Revolutionary France: *The two are but one* (1791), an anti-monarch propaganda pamphlet, where Medusa's punishment—a head filled with snakes—is placed onto the head of Queen Marie

[41] Cesare Lombroso, quoted in Susan Ann Batchelor, '"Prove me the bam!" Victimisation and agency in the lives of the young women who commit violent offences' (PhD thesis, University of Glasgow, 2017).

[42] Beard, *Women and power: A manifesto*.

[43] Paul Barolsky, 'The ambiguity of Caravaggio's Medusa', *Source: Notes in the History of Art* 32, no. 3 (2013): 28–29.

[44] Diorio, 'The silent scream of Medusa', 4.

[45] Gustav Klimt, *Pallas Athene*, 1898, Austria.

[46] Lombroso, quoted in Batchelor, 'Prove me the bam!'.

[47] Susan B. Antony, quoted in Elizabeth Johnston, 'The original "nasty woman"', *The Atlantic: Culture*, November 6, 2016.

[48] Beard, *Women and power: A Manifesto*.

[49] Ibid.

Antoinette.[50] Since then, many women in power have suffered the same fate as Medusa, demonised into silence by male punishment and fear. As mentioned previously, Medusa's image inspires the desire of male conquest: associating modern women with Medusa subconsciously invites male violence upon those women.[51] During the 2016 US Presidential Election, the image *Trump and triumph* (2016), which depicted Clinton's head superimposed onto Cellini's statue in place of Medusa while Trump stands in victory, went viral.[52] Medusa's beheading remains a cultural symbol of a call for death to powerful women. Such associations constitute a powerful and pervasive form of socially approved symbolic discourse, which dramatises and promotes violence against women until it is so ingrained in our culture that we hardly recognise it.[53] As Medusa entered politics, her rape was erased from the cultural consciousness. This is reflective of our legal system as one that is oftentimes callous and ignorant of sexual assault; one that considers rape culture an innate part of womanhood, as discussed below. However, there is hope Medusa's voice may yet be liberated from its male constraints. Hélène Cixous uses Medusa as a representation of women's free speech and is an example of women adopting Medusa as symbol of female empowerment.[54] Thus, how we see Medusa in other powerful women highlights how they are seen in their own period. While contemporary women face the same threat as Medusa, as her image becomes a call to destroy powerful women, there is a hope she is being reclaimed by feminist scholars such as Cixous.

Medusa, sexual assault, and justice

Roland Barthes, as discussed by Manderson, views the nature of myth as a 'meta-language' that strips the raw material from context.[55] Myth, according to Barthes, transforms 'historical intention into a natural justification' and is the adversary of change.[56] With regards to works such as Caravaggio's *Medusa*, Barthes' analysis seems to hold true. In Caravaggio's work, no crime is shown, only punishment, and the artist relies upon the myth for justification for his depiction of violence. The punishment, which holds its place throughout art history, normalises violence against Medusa and against women in general as a result. This incarnation of Medusa has committed no crime, other than being a woman with power: the promotion of myth takes away from the fact she is a survivor. This brings this analysis back to the question of the power of being seen and being seen in a particular way. If Medusa's punishment is always depicted, we ignore the reason for it. The normalisation of violence against women in our legal system and in issues of sexual assault is a reflection of this archaic image of the demonisation of women.

Our 'hero' in Cellini's *Perseus with the head of Medusa* raises Medusa's head to open-eyed spectators, while Medusa's own eyes are closed and her lips locked in a (literal) deadly silence.[57] It is this silence that has made Medusa a symbol for sexual abuse victims. In light of the #MeToo movement, the lack of visibility around sexual assault has been placed at the forefront of the popular media. Despite the criminalisation of rape, various scholars argue that we still exist in a society pervaded by rape culture based on the number of crimes unreported and unpunished.[58] The shaming and punishing of women for coming forward reinforces this idea of a rape culture socially legalising assault, linking into the idea Manderson presented regarding *Jurisprudence* and the taxation of shame.[59] Though less evident in the twenty-first century, there is a link between destruction and rape: it is a punishment associated with the inherently patriarchal idea of purity. The violent killing of Medusa as she sleeps has been repurposed

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[50] Anonymous, *The two are but one*, late 18th C, hand-coloured etching, New York, The Metropolitan Museum of Art.

[51] Johnston, 'Let them know that men did this'.

[52] Unknown, *Trump and Triumph*, 2016, www.zazzle.com/store/trumpandtriumph.

[53] William Kidd, 'Marianne: From Medusa to Messalina: Psycho-sexual imagery and political propaganda in France 1789–1945', *Journal of European Studies* 34, no. 4 (December 2004): 339.

[54] Cixous, Cohen, and Cohen, 'The laugh of the Medusa'.

[55] Desmond Manderson, 'The metastases of myth: Legal images as transnational phenomena', *Law and Critique* 26 (2015): 208.

[56] Roland Barthes, quoted in Ibid.

[57] Cellini, *Perseus with the head of Medusa*.

[58] Johnston, 'Let them know that men did this', 4.

[59] Desmond, 'Klimt's *Jurisprudence*', 3.

by feminist scholars to act as a representation for sexual abuse. Medusa's prone and naked body beneath Perseus's feet tells the story of many rape victims, silenced as their metaphorical head and voice are cut off. The crime of sexual harassment is also a story of silencing and, as we have seen, Medusa is a representation for the voiceless feminine and arguably most relevant in relation to discourse surrounding sexual assault.[60] Unlike Medusa, we no longer call for the death of women who have been assaulted, but they are punished by our society through silence nonetheless; untested rape kits, unreported assaults, nondisclosure agreements (NDAs) signed under duress.[61] According to the National Crime Victimization Survey (2010–2016), in America alone, for 1,000 sexual assaults, less than a third of assaults will be reported to police.[62] It is estimated hundreds of thousands of rape kits are left untested due to a lack of resources and funding.[63] In a justice system set on notions of viewing and looking to determine guilt or innocence, a lack of evidence that can be seen, such as a rape kit, could be detrimental. By extension, NDAs are often devices used to control victim's voices: John Bornstein states that many NDAs are signed under duress due to the 'very stark choice' many women are forced to make between silence and settlement.[64] Recent investigations into the Harvey Weinstein allegations are clear examples of the pervasive use of NDAs: Zelda Perkins, one of the women assaulted by Weinstein, claims that she, and other victims, felt they had no choice but to sign NDAs.[65] If the court system operates on the idea of who the law *sees*, and the law only sees the punished Medusa, there is no punishment for Perseus.[66] Gurnham argues that the court system must notice who is viewed and who is not and how this is overtly gender-based in our society.[67] A clear example of a recent shift in this notion of 'seeing' is the #MeToo movement, related to the Weinstein cases discussed previously. #MeToo has left women with a deep anger about the culture in which they live, where assault is 'shrugged off as an inevitable part of being a women', leading to the adoption of Medusa as a symbol for sexual assault victims.[68] As we have seen a movement away from the silencing of sexual assault in the law and the visibility of survivors, Medusa's image has shifted from villainy to victimisation.

Reclaiming Medusa

The final artwork this essay will discuss is 2008's *Medusa* by Luciano Garbati, a modern, feminist interpretation of Medusa gaining attention due to the #MeToo movement.[69] The statue represents a 'what if?', where Medusa defeats Perseus and she stands holding his head in her hand, sword in the other, staring defiantly at her audience. A key aspect of the work, according to Garbati, is the difference between male and female victories:

> The representations of Perseus, he's always showing the fact that he won, showing the head … if you look at my Medusa … she is determined, she had to do what she did because she was defending herself.[70]

It is interesting to note that in this interpretation of Medusa, she has beheaded Perseus much as he beheaded her. She has not used her punishment to paralyse him: Medusa will not use her own destruction to destroy him, but rather meet him on equal footing. We could argue that this acts to represent women finding their voice in traditionally male spaces: finding relief in a traditional male

[60] Jennifer L. Airey, '#MeToo', *Tulsa Studies in Women's Literature* 37, no. 1 (2018): 7–13.

[61] Ibid.

[62] Rachel E. Morgan, *National Crime Victimization Survey, 2010–2016* (2017), www.bjs.gov/content/pub/pdf/cv16re.pdf.

[63] Airey, '#MeToo'.

[64] Alison Branley, 'Signing away their voice: How nondisclosure agreements silence Australian women', *ABC News*, February 25, 2020, hwww.abc.net.au/news/2020-02-25/non-disclosure-agreements-silencing-sexual-assault-victims/11863450.

[65] Michelle Kaminsky, 'The Harvey Weinstein effect: The end of non-disclosure agreements in sexual assault cases?', *Forbes*, October 26, 2017, www.forbes.com/sites/michellefabio/2017/10/26/the-harvey-weinstein-effect-the-end-of-nondisclosure-agreements-in-sexual-assault-cases/?sh=8aa05952c11c.

[66] Gurnham, 'Ched Evans, rape myths and Medusa's gaze'.

[67] Ibid.

[68] Airey, '#MeToo', 7.

[69] Luciano Garbati, *Medusa*, 2008, resin or bronze, Argentina.

[70] Annaliese Griffin, 'The story behind the Medusa statue that has become the perfect avatar for women's rage', *Quartzy: She Slays*, October 4, 2018.

domain of violence, and a voice in a traditional male legal system. Medusa is naked but not sexualised: she is there to see and be seen, to take her place in our society and our justice system. [71] She exists without the shame associated with sexual assault and stands before us with the pride and bravery we should associate with members of #MeToo. It is the only piece discussed here where Medusa looks directly at her audience. This Medusa *sees* and understands what it means to be seen. Her gaze forces a male-dominated society, one so used to looking rather than being looked at, to face their own internal judgement process and address this wider issue of justice and law. Griffin considers her the 'perfect avatar for … female rage' in her resolution.[72] Garbati's Medusa represents a reclaiming of Medusa's image by feminists, to enable the telling of a wider story of sexual assault in our society and its representation in our justice system.

Conclusion

To live within the law, we must be seen by the law. Throughout history, many groups of people have been unable to rely on our legal systems for justice or compensation because they have not been seen as victims in society. This rings especially true for women. We see this reflected through images of Medusa in art over time: a representation of women in power, sexual assault victims, and women more generally. Through analysing images of Medusa we chronicle how her image has developed, and with it how ideas about women and sexual assault have changed from Ancient Greece to #MeToo. Medusa's image has been pulled between meanings—from sexualised woman to victim, from aggressive monster to powerful woman—as society and law's image of femininity has changed. However, with works like Garbati's, we can hope that the image of Medusa—like the victims she represents today—rests safely in the hands of future generations of women.

List of artworks

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