

Foreign Norm Entrepreneurs’ Misinformation and Disinformation Narratives on LGBT+ Rights in Europe

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ABSTRACT

With ample evidence that foreign state actors and non-state norm entrepreneurs are engaged in misinformation and disinformation campaigns challenging the European Union’s human rights framework on LGBT+, this study analyses the narratives that these actors disseminate. Based on two methods – a standard literature review of academic and “grey” literature, as well as complementary analysis of entries in the EUvsDisinfo database – the study identifies four main narratives that can be attributed to or are actively sponsored by non-European actors: 1) Opposing gender ideology and protecting God’s order, 2) Heteroactivism and the protection of the rights of the “natural” family, 3) LGBT+ rights as Western colonialism, and 4) LGBT+ rights as a threat to the rights of children. Even though EU’s strong protection of freedom of speech makes it challenging to address misinformation and disinformation that falls outside hate-speech legislation, this paper argues that exploring the following counter measures could be worthwhile: 1) harmonization of European legal frameworks, 2) financial scrutiny and 3) strengthened automatic detection, editorial policies, and community flagging, as well as the capacity to systematically deal with misinformation and disinformation campaign targeting LGBT+ across digital spaces in Europe.

Key words: norm entrepreneurs, misinformation, disinformation, LGBT+ rights, European Union

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1. Introduction

There are clear signs of a backlash against equal rights for lesbian, gay, bisexual, transgender, (LGBT+, where the plus represents all non-conforming sexualities and gender identities, as well as heterosexual allies), which is not characteristic only of Europe, but increasingly visible in transnational politics where conservative norm entrepreneurs are challenging legal reforms and actively campaigning for an interpretation of human rights that excludes non-conforming sexualities and gender identities (Encarnación, 2017; Ayoub, 2019). A backlash is understood as “a large, negative, and enduring shift in opinion against a policy or group that occurs in response to some event that threatens the status quo” (Bishin et al. 2016:626), and can enjoy varying degrees of active support from different public figures, non-state actors and/or elected officials. Although the backlash is visible across contexts, when it comes to the European scene it is particularly pronounced in Central and Eastern Europe (European Union Agency for Fundamental Rights, 2020; Guasti and Bustikov, 2019; ILGA-Europe, 2020; Takas and Szalma 2019). Public figures and officials across Europe in countries including Bulgaria, Poland, Cyprus, Finland, Greece, Portugal, and Spain have actively engaged in discriminatory rhetoric and even hate speech (ILGA-Europe, 2020).

Some public officials in Central and Eastern Europe are openly challenging the EU’s equality-for-all framework, and boldly showcasing their non-compliance with the EU norms and regulations. The Hungarian Prime Minister Viktor Orban and his Christian Conservative party have been strong promoters of a bill banning schools from talking about non-conforming sexualities and non-binary gender identities, a bill that has subsequently been passed in June, 2021. The Archbishop of Prague (Czech Republic) used the term the “rainbow plague” in a pro-family statement in 2019, arguing that rainbow activities threaten the stability of society (Guasti and Bustikov, 2019). Polish President Duda’s statements claiming that LGBT+ advocacy is more harmful than communism and his lending support to the statement “LGBT is not people, it’s an ideology” (Human Rights Watch, 2021) clearly signaled a rejection of the European normative framework on equal rights for the LGBT+ community. Polish public officials’ vocal support of the so-called ‘LGBT free zones’ is another specific example of state-sponsored homophobia which indicates a new level of conservative confidence to publicly challenge the EU’s ambitions of making the EU a “Union of Equality” where LGBT+ persons’ fundamental rights are guaranteed, respected and promoted. Indeed, ILGA-Europe’s consecutive annual reports (2018, 2019, 2021 and 2022) note that the protections in force are being challenged and discrimination against LGBT+ persons is on the rise in several

countries, most specifically in Bulgaria, Hungary, Poland, and Romania.

Although political homophobia across the European territory enjoys domestic support in Central and Eastern Europe, there is plenty of evidence that foreign-state actors and international norm entrepreneurs are actively instigating and exploiting the diverging opinions on LGBT+ rights in the European Union to promote an ideological agenda or political goals (Ayoub, 2019; Archer and Provost, 2020; Karlsson, 2019:1; Roguski, 2019; Stoeckl and Medvedeva, 2018; Stoeckl 2018, 2020). The term norm entrepreneurs, coined by Sunstein (1996) simply refers to people or groups interested in changing social norms. Any individual or group can engage in norm entrepreneurship, but some actors – by the nature of their societal position and access to resources – are more influential in moving and orchestrating social norm shifts.

Misinformation and disinformation are key tools when it comes to influencing public opinions on LGBT+ rights, and non-EU norm entrepreneurs' attention and informational activities appear to be concentrated to Central and Eastern Europe (ILGA-Europe, 2020). Even if biased and deceptive norm advocacy on LGBT+ rights in Europe cannot solely be attributed to foreign actors, this study is particularly interested in influences that can be tied to non-European actors. The purpose of this study is thus to identify the main misinformation and disinformation narratives regarding LGBT+ circulating in the European Union that can be tied to foreign actors. A better understanding of the misinformation and disinformation narratives could greatly assist future policy responses and ensure the survival of a common and inclusive union-wide human rights framework.

2. On a mission to deceive – Misinformation, disinformation and hate speech

Misinformation is generally defined as “inaccurate information created or shared without an intent to mislead or cause harm and can include genuine mistakes of fact” (Wardle and Derakhshan, 2017 in Thakur and Hankerson, 2021:7). Disinformation, however, lacks a common definition (Pielemeier, 2020). This study uses the European Commission definition, perceiving disinformation as “verifiably false or misleading information that is created, presented and disseminated for economic gain or to intentionally deceive the public, and may cause harm” (European Commission, 2018: unnumbered). Pielemeier (2020) argues that the EC definition has several merits compared to competing definitions as it is “quite broad and is therefore likely to include most, if not all, of the kinds of content that lawmakers in

different contexts are concerned about” (Pielmeier, 2020:919). The definition thus includes foreign propaganda, deliberate dissemination of false/fake news, economically motivated disinformation, and production and distribution of so-called blended information, which refers to content that contains both true and false information that is distributed with the intent to deceive the public. This study notes that the senders’ intentions are often difficult to determine in cases where the sender’s identity is unknown. Authors, in particular the original sources of disinformation, are often strategically hidden, which denies the recipients a chance to assess the source’s intentions. The social media landscape connective logics (Bennett and Segerberg, 2012), where content is re-packaged and personalized, as well as the eventuality shared through social networks, provide actors with multiple opportunities to hide their identity behind a relay of message senders.

It is important to note that this study focuses on both disinformation and misinformation related to LGBTI+ issues, as source ambiguity often makes it difficult or even impossible to ascertain the intentions behind the content that is produced and disseminated, as well as gain insights in who stands to gain from the narrative. For example, it is difficult to ascertain deceitful intentions in cases where content is produced by an ideologically motivated actor, as it is conceivable that the producer genuinely believes in the biased content that is promulgated. It is quite possible that a religious norm entrepreneur genuinely believes that non-conforming sexualities and gender identities are a threat to the God-given social order, and therefore cannot be accused of creating and disseminating information which seeks to intentionally deceive the public.

This study does not include hate speech narratives in its review of foreign-penned or sponsored misinformation and disinformation narratives, as this is illegal in most European countries, albeit not always actively enforced. Hate speech is defined as “all forms of expressions that spread, incite, promote or justify racial hatred, xenophobia, anti-Semitism or other forms of hatred based on intolerance” (Council of Europe, 1997). A different definition highlights the aspect of broad dissemination when it defines hate speech as “public incitement to violence or hatred directed to groups or individuals on the basis of certain characteristics” (European Union, 2008). There are clear overlaps between misinformation, disinformation and hate speech regarding LGBT+ in the sense that they all contain varying degrees of negatively biased descriptions; yet the latter has a clear intention to also vilify, humiliate, threaten, scare, and intimidate the target (in this case the LGBTI+ individual and/or community). The intentions behind misinformation and disinformation, on the other hand, are to influence the public or a section of the public by feeding it untrue, deceptive, or biased information about LGBTI+ people; however, these actions lack

the explicit element of threat and call for violence against the target group or individual. Hate speech does, however, thrive on misinformation and disinformation narratives that fuel and incite intolerance against LGBTI+ individuals or the people/organizations defending their rights. Misinformation and disinformation can thus be seen as enablers to hate speech as they distort public discourses and potentially pave the way to aggression and normalize it. Furthermore, because of the element of explicit aggression, hate speech is already illegal in most of the EU.

3. Foreign interference with the European human rights framework on LGBT+

Digital communication facilitates foreign actors' and norm entrepreneurs' access to and control of public life in their own country, as well as the opportunity to operate undetected outside their country of origin (Giusti and Piras, 2021). There is specific evidence that the EU's democratic processes are being targeted and interfered with by disinformation campaigns aiming at challenging democratic ideals and agreements on rights and responsibilities inside the EU (Makhashvili, 2017). Based on a systematic review of 11 countries' secret service reports, the Russian government is repeatedly identified as the main foreign actor when it comes to attempts "to influence European politics and decision-making most, and more so than China and other states" (Karlsen, 2019:1; Roguski, 2019). But the EU is also targeted by other foreign non-state actors, most notably religiously motivated norm entrepreneurs such as the International organization of families/World Congress of Families, and The Russian Orthodox Church (Archer and Provost, 2020; Stoeckl and Medvedeva, 2018; Stoeckl 2018, 2020). The Roman Catholic Church has a long tradition of active norm-entrepreneurial efforts.

The Russian government has increasingly used state-sanction homophobia as a tool to draw symbolic boundaries between Russian culture and the degenerate liberal West, as well as to construct itself as a significant ideological force and protector of traditional values (Edenborg, 2021). State-sanctioned homophobia has also become an important tool for achieving international and policy goals for weakening the EU. Russia's non-violent interference in foreign nations goes way back (Giles, 2016; Van Herpen, 2015; Yuskiv et al., 2021) and has been attributed to a desire to ensure long-term regime security and the resurrection of its former world-power status (Karlsen, 2019). National stability and continued regime stability are contingent on a weakened EU and NATO (Karlsen, 2019). This is pursued by using a range of broad-based subversion and destabilization tactics, which seek to weaken and undermine adversary societies (Giles, 2016). The West

and Europe are targeted using a divide-and-rule approach, where identifying and exploiting divisive social issues is the core strategy. Equal rights for LGBT+ people appear to have been singled out as a particularly opportune topic to increase friction between governing bodies of the Union as well as fuel disunity between the EU member states.

Although the Russian government is the key actor, it is important to understand that it is not the sole actor with an interest in challenging the last decade's expansion of rights for the LGBT+ community. The Holy See, with its headquarters inside the micro-state of Vatican, is the key transnational non-state norm entrepreneur. Given that the Vatican maintains full diplomatic relations with 177 countries, including the EU, and is legally outside the EU territory, the Holy See and its Vatican-based institutions are here considered a foreign actor. It is an entity whose power consists primarily of its normative influence that cuts across geographic boundaries. The Holy See and the Vatican are an exclusively patriarchy entity, but have nevertheless been particularly active in discussions about women's rights, contraception and sex education, rights related to sexual orientation and gender identity, both in and outside the European union (Hodzic and Bijelic, 2014). The European Parliamentary Forum's report (Datta, 2018) on the Christian Right-wing network, Agenda Europe, outlines how Vatican actors and institutions are central in the organization of the network of "Vatican Surrogates", which seeks to influence politics. Kuhar and Paternotte's (2017) edited volume exposed the direct links between the Vatican and the 2010s French anti-gender campaign (see Stambolis-Ruhstorfer and Tricou, 2017).

Another religious norm entrepreneur is the Tradition Family and Property (TFP), a set of ultra conservative, Catholic-inspired organizations which work towards restoring the divine order. The network was initiated in Catholic circles in Latin America and is now active in Europe, targeting sexual and reproductive rights. Although TFP has headquarters in France, the network's tentacles are global, and the leadership tends to consist of small group of men, usually of Latin American descent, as well as European aristocrats. According to Data (2020), TFP's influence takes three main routes: social mobilization, norm entrepreneurship and entering decision-making spaces. TFP has successfully targeted national institutions, and by securing positions as policy advisors to a socially conservative government, such as Italy and Croatia, TFP-affiliated individuals gain access to influential political spaces. TFP has also excelled in developing legislative packages to facilitate conservative policy makers' efforts. TFP has created permanent legal expertise who engages in "lawfare" at both national and international levels. Three relatively recent events in Europe appear to have been supported by TFP,

albeit spearheaded by local partners: 1) a ban on abortion in Poland; 2) blocking support for *She Decides* – a movement for the advancement of the fundamental right of girls and women everywhere to enjoy body autonomy and make their own choices; and 3) halting parliament to deliberate over civil partnership legislation that would allow same-sex unions.

The International Organization for the Family (IOF) is another important trans-national norm entrepreneurship currently active in the European Union. IOF also departs from a heteronormative ideology which celebrates and aspires to ensure the stability of a patriarchal heterosexual world order. The World Congress of Families (WCF), an IOF project, actively engages in European politics by organizing regular pro-family conferences which gather conservative politicians, activists and professionals in order to facilitate and strengthen cooperation between like-minded actors. The events propagate homophobia and transphobia under the guise of protecting the “natural family”. The Southern Poverty Law Center has added the WCF to its anti-LGBT+ hate groups list in February 2014 due to its direct involvement in the 2013 Russian LGBT+ propaganda law and its international opposition to LGBT+ rights. The Human Rights Watch (2015) identifies the WCF as one of the most influential American organizations involved in the export of hate against LGBT+ across the world. To describe the norm entrepreneur as an American organization is somewhat misleading, as Russian actors were quite central in the inception in the late 1990s and formation of what would later become an influential transnational conservative force (Stoeckl, 2020). Trimble (2014) argues that the WCF’s ability to knit together alliances of like-minded pro-family actors across borders allows it to operate successfully beyond the US Christian right arenas, especially in conservative Christian countries such as Spain, Poland, and Russia.

To sum it all up, there are a number of actors that actively exploit the EU’s and member states’ existing freedom of speech legislation, as well as human rights mechanisms in order to halt and roll back the human rights expansion in the field of sexual and reproductive health rights, including equality for non-conforming sexualities and gender identities, with the interest of protecting the nuclear family (Velasco, 2021; Data, 2020). Furthermore, conservative actors have access to significant resources needed to pursue their agenda. A recent study has highlighted that the anti-gender movement in Europe has enjoyed a well-filled war chest between 2009 and 2018 (Data, 2021). Data (2021) finds that a minimum of USD 707 Million have been channeled to anti-gender actors from 54 different non-governmental organizations, foundations, religious organizations and political parties based in the US and Russia, as well as within the European Union (Data, 2021).

4. Methods

This study relies on two methods: a standard literature review of academic and “grey” literature from EU agencies and NGOs working with LGBT+ persons for their equal rights, as well as a supplementary review of entries in the *EUvsDisinfo* database.

Literature for the review was first sourced from Google Scholar using the key words “disinformation”, “misinformation” and “hate speech” in combination with the acronym “LGBT*”; and secondly, from the academic databases *Sociological Abstracts*, *Scopus* and *Academic Search Elite*. The literature review also included relevant grey literature from trusted and reliable organizations such as FRA (European Union Agency for Fundamental Rights), Human Rights Watch, European Parliamentary Forum for Sexual & Reproductive Rights and ILGA-Europe. Articles and reports were manually processed to ensure that the item identified a known or suspected foreign actor, and included examples of attempts to spread misinformation and/or disinformation regarding LGBT+ in Europe. Items that fulfilled the purposive sampling criteria were analyzed using a conventional approach to content analysis, i.e. exploring the narratives found in the material. A conventional approach entails avoiding the use of preconceived categories and instead allows the content categories and overarching themes to emerge more organically from the data (Hsieh and Shannon, 2005).

The literature review was supplemented with an examination of entries in the database *EUvsDisinfo*. The database is a specific outcome of the European Union’s Strategic Communications & Information Analysis Division and the European External Action Service. Both entities are tasked with supporting the EU’s capacity to forecast, address and respond to disinformation activities of external actors. *EUvsDisinfo* identifies, compiles and dispels disinformation originating in primarily pro-Kremlin media that are spread across the EU and Eastern Partnership countries, and it is envisioned to be a part of the EU’s Rapid Alert System on Disinformation. All entries containing LGBT* dated between 1 January 2020 to 1 June 2021 were included in the analysis. During the sampling period, 47 disinformation attempts in total had been identified and disseminated in European and partnership countries’ outlets. The 47 disinformation attempts did not always focus solely on the EU, but also on the US and Russia, yet have been disseminated in an EU country and therefore reached EU audiences. Contrary to the academic and grey literature, which identify Central and Eastern Europe as primary targets, the number of items in Italian and Spanish indicate that populations in Italy and Spain are also under attack. The review of concrete example of misinformation and disinformation was

supplementary and conducted in order to explore the existence of additional narratives beyond the ones identified through the literature review. The overarching narrative is a portrayal of LGBT+ as a threat to the “natural family unit” and children’s rights to protection from sexual content and pedophilia, which makes LGBT+ a threat to society and the reproduction of acceptable social mores. With sub-themes overlapping with the narratives emerging from the literature review, the review of actual examples of specific disinformation attempts served as a verifier of the results emerging from the literature review.

It is important to note that the analysis of the academic and grey literature focused exclusively on narratives that could be connected to a foreign source, and that content that was not tied to an identified or suspected foreign source was not included in the analysis. Consequently, it is possible that a different purposive sample would have produced other narratives.

5. Results

The literature review resulted in the identification of four dominant narratives that are promoted and/or supported by foreign actors: 1) Opposing “gender ideology” and protecting God’s order, 2) Heteroactivism and the protection of the rights of the “natural” family, 3) LGBT+ rights as Western colonialism, and 4) LGBT+ rights as a threat to the rights of children.

For the purpose of analytical clarity, the narratives are presented separately, but in reality, they often appear in various combinations and create mutually reinforcing supportive frames undermining the EU’s human rights framework. The presentation also includes some illustrative examples from the database EUvsDisinfo.

5.1 The attack on God’s order - Opposing “gender ideology”

Kuhar and Paternotte (in multiple publications, see reference list) trace a narrative of “anti-gender” across Europe through case studies in Austria, Belgium, Croatia, France, Germany, Ireland, Italy, Poland, Russia, Slovenia, and Spain. The term “anti-gender” captures a general opposition to women’s quest for equality and control over sexual and reproductive rights as well as LGBT+ rights, which are all believed to erode traditional/nuclear/“natural” families consisting of a married man and woman and their children. Religion plays a key role in the construction of the anti-gender ideology narratives. Paternotte and Kuhar (2018) trace the first organized anti-gender campaigns in Europe to the Roman Catholic Church and the Holy See. Gender ideology narratives have started in conservative wings of the Vatican in

the 1990s, in reaction to UN conferences in Cairo (1994, on population and development) and Beijing (1995, on women) which were seen as promoting the so-called “Gender Ideology”. Kuhar and Paternotte (2017: 9) therefore argue that the “Gender Ideology” paradigm is a Catholic invention, with the Catholic Church as its chief “discourse producer” (Kuhar and Paternotte, 2017: 262). The religiously inspired narratives argue that fighting against gender ideology means fighting for God and His plan for us. The divine plan revolves around “natural order”, where marriage, family, and the right to life take center stage (European Parliamentary Forum reports 2018, 2020). Homosexuality and non-heteronormative gender expression are perceived as “abominations” (Ayoub and Page, 2020). Narratives also include descriptions of homosexuality as inherently “perverse, excessive and wicked” (Mrsevic, 2013; Van Klinken and Zebracki, 2016). “LGBT+ practices” are described as threatening to the social and moral order, as prescribed to man by God (Van Klinken and Zebracki, 2016).

Kuhar and Paternotte (2017) explain that the term “anti-gender” captures a general opposition to processes which threaten to erode hegemonic masculinity and a so-called natural order. Gender opponents rationalize their opposition by claiming that they fight a supposed destruction of the civilization, which in their minds is imminent due to the expansion of equal rights to women and LGBT+ people (Kuhar and Paternotte, 2017). Kuhar and Paternotte (2017) emphasize that gender ideology opponents are often transnationally interconnected, even if they regularly trumpet their local embeddedness and support for national sovereignty. Nevertheless, their declared aim is to resist morally corrupt elites – notably represented by the EU and United Nations – that attempt to “colonize” them by propagating liberal ideals. With the threat particularly pronounced in Western liberal democracies and Europe, conservative actors with little in common beyond a common enemy are able to unite to work against the onslaught of “Gender Ideology” (Hodzic and Bijelic 2014). Kovats and Pöim (2015) find that the term “gender” successfully functions as a “symbolic glue” for far right and conservative movements in France, Germany, Hungary, Poland and Slovakia. The term “Gender Ideology” is an empty signifier which allows a diverse range of religious and far-right actors to team up to fight women’s equality, sex education and the rights of LGBT+ people such as same-sex marriage. More recently, the term “LGBT ideology” has been used derogatorily, notably by Polish politicians, to attack and dehumanize LGBT+ people in response to the European Commission and European Parliament statements (State of the Union by President von der Leyen at the European Parliament Plenary, 2020; European Parliament, 2020). A specific example of anti-gender disinformation is the item in a Hungarian outlet (EUvsDisinfo 19 May 2020), which claims that the UN is seeking to ban

the terms “Wife” and “Husband” and replace it with the more gender neutral term “spouse”. The UN is identified as an attacker against the God-given order of CIS men and women, and the piece questions the UN’s priorities. A similar example was found in a Romanian news item which claimed that the European Parliament was introducing a pro-homosexual vocabulary which would prohibit the use of terms such as “mother”, “father”, “trans”, “gay” or “lesbian”, on the grounds that these terms would be disrespectful to certain ethnic or gender minorities such as LGBT+ people. (EUvsDisInfo March 2021).

During the review of the literature, it became clear that actors who propagate anti-gender ideology, whether by stating overt religiously motivated reasons or not, often appear to be ideologically convinced of their standpoint and thus do not fall squarely in the category of disinformation attempt, but rather constitute misinformation. Nevertheless, the overarching narrative provides a fertile ground for disinformation campaigns and promoting one or several other narratives identified in this study.

5.2 Heteroactivism and the protection of the rights of the “natural” family

A central component in anti-gender campaigns is the conviction that a liberal understanding of gender is believed to pose a serious threat to human procreation, as it is claimed to negate sexual differences and gender complementarity, and thus threatens traditional/nuclear/“natural” families consisting of a married man and woman who have children. Quite contrary to the previous narrative, which draws upon an antagonistic and negative framework, *heteroactivism* has a different tonality (Browne and Nash, 2019, 2020). Heteroactivism attempts to reassert the superiority and centrality of heteronormativity and the traditional family for both individuals and society. Heteroactivism, unlike the anti-gender narrative, draws upon positive emotions as a means to convince people that the movement is contributing to a better future for mankind. This narrative explicitly avoids overt homophobia or anti-gay expressions, as well as suppressing other groups’ rights, as long as they do not interfere with the rights of families.

Mourao Permoser and Stoeckl’s (2020) study of pro-homeschooling campaigns notes that traditional human rights defenders’ language and rhetoric have been hijacked to promote family rights. Human rights are reframed as the rights of the pro-traditional/natural family to choose for themselves and their right to choose for their children. The European Parliamentary Forum’s report *Restoring the Natural Order* finds that the focus has shifted from being “anti” others’ rights, such as LGBT+ and women’s rights, to being “pro” natural family and reviving the (forgot-

ten) right of fathers and parents to shield children from what is considered a harmful gender propaganda (Datta, 2018).

Very similar to the previous anti-gender ideology narrative, it is hard to decisively determine if there is an intention to deceive in this case. It is not inconceivable that “heteroactivists” genuinely believe in the information they disseminate, i.e. that the rights of families have been forgotten or at least not been given the same attention as other social groups. Furthermore, a heteroactivist discourse is much more difficult to identify as disinformation as its positive tonality is that of human right-advocacy, and advocates unfavorable treatment and discrimination of LGBT+ people only by extension.

5.3 LGBT+ rights as Western colonialism

Another narrative argues that the promotion of the rights of LGBT+ people is a poorly veiled “colonization” attempt by the morally corrupt West. Equality for LGBT+ people is framed as “a neocolonial project through which activists and their governments try to export their decadent values and secularize non-Western societies” (Kuhar and Paternotte, 2017:8). By framing LGBT+ rights as a form of foreign imposition, opponents effectively delegitimized the claims. The narrative argues that Central and Eastern Europe are particularly exposed to this through geographical position and proximity to the West (Korolczuk & Graff, 2018). By using the negative connotations of the term “colonization”, conservative norm entrepreneurs depict LGBT+ people’s rights as an attempt at ideological indoctrination. In the study *Gender as Ebola from Brussels*, the authors find that the fear of being colonized by the West is more present in Central and Eastern Europe (Korolczuk and Graff, 2018). The “colonization” narrative also exploits a growing disappointment and mistrust of the “EU establishment” and Western liberal elites (Korolczuk and Graff, 2018). The narrative rests on and exploits a growing skepticism of centralism and the EU (Kuhar and Paternotte, 2017) and often intentionally uses misleading information (see Korolczuk and Graff, 2018). The colonization narrative also plays on more general fears of globalization and a sense of alienation, where Western global institutions and established elites are seen as imposing their “liberal elite views”, which are contrary to populist discourses that allegedly reflect the “real” people. Opposing the rights of LGBT+ people is interpreted as an act of resistance against the unwanted “ideological colonization” by those who do not share the egalitarian and freedom-based principles of the European liberal project.

The Russian government is the key foreign actor engaged in using and spreading the “colonialism” narrative, particularly in Central and Eastern European countries

(Verpoest, 2017). The Kremlin is presented as the guarantor of traditional values and decency as well as the savior of European civilization (Moss, 2017). Russia's Ministry of Culture announced in 2014 that Russia is not "gayropa", but a protector of religious, cultural, and historical traditions and values, unlike the morally corrupt establishment in Europe (Stoeckl and Medvedeva, 2018). The Russian government's geopolitical strategy also involves uniting like-minded forces in Europe and thereby intentionally destabilizing the EU by supporting right-wing dissenting factions within the EU (see Moss, 2017).

The EUvsDisinfo contains several disinformation attempts claiming that EU is secretly out to colonize and eradicate local culture and social mores. Russia Today's French channel broadcasted an item describing Russian resistance towards Western imperialist activities as trying to resist perverse pseudo-Western values, i.e. equal rights of LGBT+ people. The piece claimed that the Russian people had expressed their will in the recent referendum for amendments to the constitution and that the West needs to stop with its propaganda and respect the Russian democratic process (EUvsDisinfo 02/07/2020). Another piece claimed that the Soviet Union's last leader Mikhail Gorbachev had been warned against falling into the Western liberal trap which is a decadent, materialistic, hedonistic and perverse civilization. Unfortunately, Gorbachev did not heed warning and Russia fell into the trap; had it not been for Vladimir Putin, Russian culture and traditions could have ceased to exist (Russia Today 02/07/2020). The colonization narratives effectively exploit the different opinions and LGBT rights and its position as a divisive issue within the EU.

5.4 LGBT+ rights as a threat to child safety

The reviewed literature also revealed a narrative where LGBT+ people are identified as a threat to children through their supposed innate "predatory behavior" and desire to "convert children into sexual perversions" (Jarkovská, 2020). In this narrative, the so-called "LGBT+ behaviors" and lifestyle constitute a risk to children. This narrative is also often connected to the rights of parents to raise and educate their children according to their moral and religious beliefs (Kuhar and Paternotte, 2017). Jarkovská (2020) finds that the portrayal of European Union countries as child molesters is common on Russian websites. The study called *The European Union as a child molester: sex education on pro-Russian websites* shows how sex education is vilified, and Russia is portrayed as a crusader and protector of traditional values (Jarkovská, 2020). Pro-Russian websites present extreme and manipulated representations of sex education in the EU, and callously exploit fears linked to concerns with sex education in educational systems (Jarkovská, 2020). There are

several examples of how the educational system and sex education in particular are portrayed as a place of sexualization of children and their exposure to unwanted influence. Unwanted influences include examples of “deviance” i.e., homosexuality in Romanian schools (Iordache, 2015), or masturbation (Stoeckl, 2018). Sex education is also portrayed as a passage to something worse, such as a general acceptance of so-called deviant sexualities, i.e. non-conforming sexual desires (Kuhar and Paternotte, 2017).

The core of this narrative is the human right of all children to be protected against indoctrination, sexualization or exposure to over-sexual adults. The image of the innocent and endangered child seems particularly effective in triggering “moral panic”. Henning (2018) finds that the notion of anti-discrimination policies in the arena of education makes the education system a key battleground. EUvsDisinfo database contains a telling video that was broadcasted across Europe, originating from a Russian channel, claiming that wealthy homosexuals could buy children at a fair in Brussels. Another example is a Croatian NGO, *The Voice of Parents and Children*, echoing the political agenda of the Vatican, opposing the introduction of sex education into the curriculum by spreading incorrect and discriminatory information (European Parliamentary Forum, 2020).

6. Conclusion and considerations

Despite some differences within the European Union at the level of social acceptance towards LGBT+ persons (Takas and Szalma, 2019; Wilson, 2020), decades of human rights advocacy, targeting both individual member states and EU institutions, have resulted in improved living conditions for LGBT+ people across many parts of Europe. Acceptance of LGBT+ people has increased in Europe since the 1990s (Wilson, 2020). In 2019, 76% of polled Europeans agreed that LGBT+ people should have the same rights as heterosexual people, which is an increase in comparison to 2015, where 71% held the same opinion (European Commission, 2020). Ayoub (2019:43) has concluded that organized rights advocacy successfully managed to persuade many European member states and key institutions to embrace a “norm that LGBT people are entitled to fundamental human rights, deserving of state recognition and protection”. Advocacy and legislative reforms that have decriminalized same-sex desires and produced anti-discrimination laws, as well as introduced protection from hate crimes, have made life significantly easier in large parts of Europe (Wilson, 2020).

Progress is, however, being actively challenged by constellations consisting of both foreign norm entrepreneurs and domestic state and non-state actors. The European Union's extended protective measures regarding freedom of speech greatly facilitate these attempts to roll back policy reforms and undermine public support for equal rights for the LGBT+ community. With misinformation and disinformation constituting a core tool, this paper has set out to identify disinformation and misinformation narratives circulating in Europe that are initiated, supported, propagated and/or amplified by a foreign actor or group of actors. The review has identified four dominant narratives that could be linked to a foreign actor or group of actors.

The identified narratives should not be left unattended. Discriminatory and inaccurate narratives are likely to create a conducive climate for the normalization of further discrimination and hate crimes, as well as strengthen a European resolution to build a "Union of Equality" by providing equal rights to LGBT+ people. One narrative in particular is likely to pose a particularly daunting challenge in moving forward. Heteroactivism – i.e. the notion that heteronormativity is morally superior and therefore "best for society" – plays an important role in the current wave of disinformation in Europe. By castigating LGBT+ people as a threat to the primary unit ("The Family") and by depicting families' rights as a human rights struggle, where the "natural family" is argued to have irrefutable rights, the traditional human right discourse becomes co-opted. Furthermore, by using the traditional human rights rhetoric, heteroactivism becomes difficult to separate from traditional rights advocacy and subsequently difficult to address through legislative measures. With the expansive European protection of freedom of expression, current laws are likely to be ineffective in countering human rights advocacy arguing a pro-heterosexuality and pro-nuclear family message based on a notion that these units have human rights.

The study also finds support for Patternote's and Kuhar's (2017: 4) rejection of a distinction between domestic and foreign influences in contemporary norm entrepreneurial efforts. In an increasingly globalized world, like-minded domestic and international actors cooperate, influence, and draw inspiration from each other. With misinformation and disinformation campaigns often led by consortia of actors, where local actors enter partnerships with foreign ones, it is difficult to establish the direction of influence and unequivocally distinguish between domestic and foreign influence. Patternote and Kuhar (2017:4) argue that "the transnational nature of these discourses and strategies" must be acknowledged, if we are to understand their dynamics.

Despite the challenges to address misinformation and disinformation, it is pivotal that the EU prioritizes the issue. If it is not addressed at the supranational level, it may send an unfortunate signal to both member states and LGBT+ individuals. A weak and/or inconsistent response from key EU institutions may be interpreted by dissenting member states as a sign of indifference to LGBT+ rights, which may be used by domestic actors to continue to dismantle the existing protections and services, as well as fail to implement the existing legal frameworks for prosecuting and sentencing hate speech and hate crimes. Lack of attention may also influence victims' willingness to report crimes, which results in hate crimes becoming less detectable. Under-reporting weakens the member states' and EU institutions' ability to monitor and understand the problem.

Given the multiple signs of ongoing challenges to the EU's existing human rights framework on LGBT+, the study would like to present three countermeasures to be considered.

1) Create a common European legal framework on disinformation, misinformation and hate speech, as well as strengthen the key stakeholders' capacity to address disinformation campaigns, misinformation and hate speech.

With misinformation and disinformation creating a conducive environment for hate speech and other crimes against LGBT+ individuals, there are compelling reasons to address discriminatory narratives even before they call for aggression. As the European legal framework and policy approaches on LGBT+ equal rights can be best understood as a mosaic, creating common standards on misinformation and disinformation, as well as hate speech, this is going to be a challenge. Langarita et al. (2018) outlined the differences in understanding hate crimes against LGBT+ people and argued that addressing disinformation and hate speech on LGBT+ issues could benefit from harmonization and adoption of comprehensive hate speech legislation. With digital spaces playing a key role in dissemination, the EU should prioritize developing common standards regarding online and offline speech, as well as initiate a dialogue with member states to resolve how adherence to standards should be enforced. If they are to be effective, legal reforms also need to be accompanied by efforts to raise public awareness on the insidious nature of disinformation on LGBT+ and the impact of hate speech in general.

2) Restrict the financial flows to groups that engage in disinformation and hate speech.

Two recent studies (Data, 2021; Archer and Provost, 2020) have revealed that socially conservative norm entrepreneurs in Europe have a significant advantage when it comes to access to financial resources. Open Democracy revealed that US Christian right groups have spent at least 280 million USD to influence foreign poli-

cy makers, including European legislative processes and public opinion in order “to stir a backlash” against sexual and reproductive rights and LGBT+ rights (Archer and Provost, 2020). Another study reports that European based conservative anti-gender norm entrepreneurs have enjoyed a war chest containing a minimum of USD 707 Million over a ten-year period (Data, 2021). European actors are thus receiving large amount of money earmarked for pursuing policy changes that would deny European citizens their human rights. The EU should consider ways to hinder financial support to individuals and groups that spread misinformation and disinformation as well hate speech on the European territory. Similar to terrorist legislation, the EU could consider criminalizing financing of extremist anti-rights propaganda and hate speech.

3) Strengthened automatic detection, editorial policies and community flagging

Resistance to misinformation and disinformation is dependent on agile editorial policies in particular in relation to social networking spaces and an early warning system that allows for swift detection, using both artificial intelligence (AI) and human expertise. As misinformation, disinformation and hate speech against LGBT+ people is primarily disseminated through digital network spaces where billions of exchanges takes place every day, automated detection system would be necessary. Although AI will be important, editorial policies (for moderated spaces or news sites) and user agreement (for social networking spaces) are important as well. The European Commission took an important step in 2016 when it reached an agreement with Facebook, Twitter, YouTube and Microsoft on a Code of conduct, which requires them to review the majority of notifications of illegal hate speech within 24 hours and to remove hate-speech content. Instagram and Snapchat signed the Code of conduct in 2018 and 2019.

This course of action also needs to include efforts to enlist digital citizens across Europe. Social networking spaces typically allow for community members to report content they believe violates the platform’s standards. Reported content is then manually reviewed by the platform content managers, which make decisions to remove the post if necessary. Needless to say, content moderation requires contextual knowledge and here platforms and civil society stand to gain by joining forces to ensure that content managers are adequately trained to handle misinformation, disinformation and hate speech on LGBT+ issues across cultural and linguistic contexts.

However, future countermeasures are dependent on strong political commitment and resolve to protect LGBT+ rights. So far, the growing disunity in Europe does not appear to have deterred the key European norm bearing institutions to continue to build a union protecting all citizens’ human rights. The European Commission

has remained clear in its position; in November 2020, it presented the first-ever EU Strategy for lesbian, gay, bisexual, trans, non-binary, intersex, and queer (LGBTIQ) rights. The new LGBTIQ Equality Strategy 2020-2025 aims to improve the life of LGBT+ persons, and the strategy includes tackling disinformation specifically regarding LGBT+ people, including hate speech and hate crime. The European Commission has also planned to increase funding for initiatives that are dedicated to combating hate speech and violence targeting LGBT+ individuals and communities, as well as expand the list of crimes that are deemed as hate speech and hate crime. The strategy provides Europe with a road map to advance LGBT equality, but the most important work lies ahead – to convince each member state to act on an increasingly contested and polarizing issue.

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Borba protiv kampanja dezinformiranja i pogrešnog informiranja koje provode norm entrepreneurs, a usmjerene su na LGBTI+ zajednicu u Europi

**Cecilia Strand
Jakob Svensson**

SAŽETAK

Uz niz dokaza da su strani akteri i nedržavni borci za norme uključeni u širenje netočnih informacija i dezinformacija koje narušavaju okvir ljudskih prava Europske unije za LGBT+ osobe, ova studija analizira narative koje ti akteri zagovaraju. Na temelju dviju metoda – standardnog pregleda akademske i sive literature te komplementarne analize unosa u bazi podataka EUvsDisinfo – studija identificira četiri glavna narativa koji se mogu pripisati neeuropskim akterima ili koje isti aktivno promoviraju: 1) suprotstavljanje rodnoj ideologiji i zaštita Božanskog poretka, 2) heteroaktivizam i zaštita prava „prirodne“ obitelji, 3) LGBT+ prava kao zapadni kolonijalizam i 4) LGBT+ prava kao prijatna pravima djece. Iako snažna zaštita slobode govora u EU-u predstavlja izazov kad je u pitanju suzbijanje netočnih informacija i dezinformacija koje ne spadaju u okvire zakonodavstva o govoru mržnje, ovaj rad tvrdi da bi istraživanje sljedećih protumjera moglo biti vrijedno truda: 1) harmonizacija europskih pravnih okvira, 2) poman financijski nadzor i 3) pojačano automatsko otkrivanje, uređivačke politike i označavanje zajednice, kao i sposobnost za sustavno otklanjanje netočnih informacija i dezinformacija usmjerenih na LGBT+ osobe u digitalnim prostorima Europe.

Ključne riječi: norm entrepreneurs, lažne informacije, dezinformacije, prava LGBT+ zajednice, Europska Unija