# Young People's Responses to Homophobic and Transphobic Hate Speech

In cooperation with the Council of Europe Equality Division (SOGI Unit) and the International Gay and Lesbian Youth Organisation (IGLYO).

**15–17 May 2014**
European Youth Centre Budapest

## Seminar Report

This report gives an account of various aspects of the seminar. It has been produced by and is the responsibility of the educational team of the seminar.
It does not represent the official point of view of the Council of Europe.

# Table of Contents

# 1. Executive Summary

The present report on the seminar “Young People’s Responses to Homophobic and Transphobic Hate Speech,” organised by the Youth Department of the Council of Europe in collaboration with the Sexual Orientation and Gender Identity Unit of the Equality Division of the Council of Europe and the International Gay, Lesbian, Bisexual, Transgender and Queer Youth and Student Organization (IGLYO) offers an overview of the main discussions and findings of the presentations, plenary and group work sessions that were held at the European Youth Centre in Budapest (15-17 May 2014).

The report includes a list of suggestions for possible future steps to further strengthen young people’s response against Homophobic and Transphobic Hate Speech drafted by the participants of the seminar. Some of the case studies presented during the seminar are included in the accompanying desktop study “Young People’s Responses to Homophobic and Transphobic Hate Speech.”

From the discussions during the seminar a series of recommendations may be formulated addressing the issues of knowledge and solidarity in the field of religion, education, and legislation, which are presented at the end of this report.

# 2. Introduction

The “Seminar Young People’s responses to Homophobic and Transphobic Hate Speech” (15-17 May 2014) was organised by the Youth Department of the Council of Europe in cooperation Council of Europe Equality Division (SOGI Unit) and the International Gay, Lesbian, Bisexual, Transgender and Queer Youth and Student Organization (IGLYO).

The aim of the seminar was to identify ways to develop and strengthen new and existing responses of youth organisations, LGBT organisations, national campaign committees and public authorities to address the challenges faced by young people who are targeted by hate speech because of their sexual orientation and/or gender identity. To this aim, 35 young participants representing LGBT and youth activist organizations from a diverse list of countries including Albania, Azerbaijan, Bosnia and Herzegovina, Bulgaria, Cyprus, Finland, Georgia, Germany, Greece, Hungary, Iceland, Italy, Lithuania, Netherlands, Northern Cyprus, Poland, Portugal, Serbia, Slovakia, Turkey, and United Kingdom were invited to take part.

The seminar took place within the timeframe of three days on the premises of the European Youth Centre in Budapest, Hungary, and was in part transmitted through the live stream channel of the Council of Europe. Each day built on a set of predetermined objectives leading up to an “Action Hour” during the European Action Day in Support of the International Day Against Homophobia and Transphobia (IDAHOT) to see how the issue of Homophobic and Transphobic Hate Speech can be further integrated in the No Hate Speech Movement campaign activities organised in the Council of Europe member states.

The program addressed the following subjects in both plenary sessions and sessions in smaller working groups. The three day programme outline:

1. Definition of hate speech, tools and challenges;
2. Analysis and development of different modes of action, concretely for the Action Hour;
3. Action Hour and discussion of future initiatives and possibilities.

The following objectives were formulated for the seminar. Each objective is followed by a short summary of the actions undertaken to fulfil it.

1. *To strengthen co-operation between LGBT youth organisations and youth NGO’s within the No Hate Speech Movement:* This was accomplished by bringing the different youth and LGBT activist organizations together in the seminar.
2. *To ensure more visibility of the consequences of homophobic and transphobic hate speech:* This was the starting point of the seminar triggering a series of questions on the nature, definitions, and consequences of hate speech, and specifically homophobic and transphobic hate speech. There was ample opportunity to share information and experiences, challenges, and opportunities and the participants were introduced to a number of online campaign tools that could help them in combating hate speech.

3. *To increase the understanding of the legal and policy justifications for addressing homophobic and transphobic hate speech within the organisations active in the No Hate Speech Movement:* On the second day, the participants were introduced to the juridical framework provided by the European Court of Human Rights and the different binding and non-binding legal instruments of the Council of Europe. Also a presentation was given on implementation strategies with as a case study the implementation of CM/Rec(2010)5 in Albania.
4. *To identify entry points for initiating and strengthening co-operation in Council of Europe member states among stakeholders addressing hate speech:* The participants were invited to offer examples from their own activist practices and to share and analyse different strategies to combat hate speech: successes and challenges, what worked or didn't work and why?
5. *To involve youth from outside the LGBTIQ community in the initiatives addressing Homophobic and Transphobic hate speech:* The different backgrounds of the participants, coming both from LGBTIQ and youth organizations, was made to converge on the shared point that combating (homophobic and transphobic) hate speech is fighting for the freedom of expression for all. As hate speech aims to silence an entire group, the freedom to freely express oneself is at stake for everybody.
6. *To develop a coordinated response of the Youth Department and the Sexual Orientation and Gender Identity Unit of the Council of Europe to address the challenges faced by LGBTIQ youth:* On the third day, the participants joined forces with the No Hate Speech movement and coordinators of the Youth Department during and "Action Hour" in which a variety of online strategies were deployed to raise awareness on the fight against homophobic and transphobic hate speech and to support IDAHOT. This was followed by a session on possible future actions and initiatives, and to develop a long-term vision to combat hate speech and fight for equality.

# 3. Definition of Hate Speech, Tools and Challenges

## 3.1 The nature and definition of hate speech

An inventory made among the participants of the seminar yielded the following defining characteristics of hate speech:

1. Verbal harm: hate speech as a form of verbal (and sometimes non-verbal) violence, thus it infringes on other people's rights;
2. Fear inducing: hate speech is used to induce a sense of fear into a person or group of persons by inciting hatred, based on intolerance and discrimination. The aim is always to marginalise, force into hiding, or otherwise silence the targeted individual or group. Hate speech can operate on an intersection of different marginalised groups;
3. Hate speech is often practiced by a (perceived) majority against a (perceived) minority. It preferably separates humanity in two distinguishable groups, one which sets the norm and the other the "abnormal" or "deviant" group. Hate speech discourse serves to clearly separate the latter group;
4. Hate speech often finds its origin in misinformation, stereotypes, or cultural norms that are perceived as eternal and unchanging;
5. Hate speech is an offence to human dignity, as it attempts to dehumanise an entire group of people based on one or more of their perceived shared characteristics.

Next, the participants were confronted with several legal definitions of hate speech in the Netherlands,[1] Denmark,[2] Iceland,[3] Norway,[4] and Sweden,[5] as well as the Council

---

1 "He who publicly, orally, in writing or graphically, intentionally expresses himself insultingly regarding a group of people because of their race, their religion or their life philosophy, their heterosexual or homosexual orientation or their physical, psychological or mental disability, shall be punished by imprisonment of no more than a year or a monetary penalty of the third category."

2 "Publicly making statements that threaten, ridicule, or hold in contempt a group due to race, skin color, national or ethnic origin, faith, or sexual orientation" (Danish Penal Code, Straffeloven, section 266 B)

3 "Anyone who in a ridiculing, slanderous, insulting, threatening or any other manner publicly assaults a person or a group of people on the basis of their nationality, skin colour, race, religion or sexual orientation, shall be fined or jailed for up to 2 years."

4 "Publicly making statements that threaten or ridicule someone or that incite hatred, persecution or contempt for someone due to their skin colour, ethnic origin, homosexual life style or orientation or, religion or philosophy of life" (Norwegian Penal Code, Straffeloven, section 135a)

5 "Publicly making statements that threaten or express disrespect for an ethnic group or similar group regarding their race, skin colour, national or ethnic origin, faith or sexual orientation" (Swedish Penal Code, Brottsbalken, Chapter 16, section 8)

of Europe CM/Rec(1997)20 on hate speech[6] and an ECtHR definition.[7] Participants were asked to point out differences and similarities between the definitions. This yielded the following responses:

1. All countries emphasise the public aspect of hate speech. This is not a constraint imposed by the Council of Europe Recommendation or ECtHR jurisprudence, but is inherent in the nature of the legal structures of these countries. Nevertheless, there is a common problem with the definition of public space in the case of online hate speech;
2. All countries as well as the Council of Europe Recommendation and ECtHR judgment give a list of several categories to which hate speech may apply although these are not at all exhaustive. Most notably, gender identity is absent in all five countries (although recently added in the case of Iceland);
3. The definitions of the ECtHR and CM/Rec(1997)20 seem to be broader than the national definitions.

Apart from the above-mentioned remarks, the following specific observations were mentioned by the participants, both from the juridical and the implementation side.

#### 3.1.1 Juridical issues, conflicting interests, and unprotected groups:

- Several legal definitions use language that may be interpreted as insensitive to the LGBT community or implicitly discriminatory: the Dutch legislation introduces the differentiation “heterosexual or homosexual,” thus excluding other sexualities and the Norwegian one uses the problematic concept of “homosexual life style,” which is often employed in a derogatory manner;
- The tension between the concept of hate speech and other fundamental rights, such as freedom of religion and freedom of speech was pointed out;
- The rights of minors are not always protected within the context of hate speech legislation, e.g. they cannot file a police report without being accompanied by an adult;
- Gender identity is missing in most definitions, thus showing a juridical gap when it comes to the protection against transphobia;
- Although states are often aware of Council of Europe recommendations, they are slow or refuse to introduce them into their legal code.

---

6 “The term ‘hate speech’ shall be understood as covering all forms of expression which spread, incite, promote or justify racial hatred, xenophobia, anti-Semitism or other forms of hatred based on intolerance, including: intolerance expressed by aggressive nationalism and ethnocentrism, discrimination and hostility against minorities, migrants and people of immigrant origin.”

7 “…that tolerance and respect for the equal dignity of all human beings constitute the foundations of a democratic, pluralistic society. That being so, as a matter of principle it may be considered necessary in certain democratic societies to sanction or even prevent all forms of expression which spread, incite, promote or justify hatred based on intolerance (including religious intolerance), provided that any ‘formalities’, ‘conditions’, ‘restrictions’ or ‘penalties’ imposed are proportionate to the legitimate aim pursued.”

#### 3.1.2 Implementation, counterarguments, education, strategy:

- Several working groups indicated different arguments with which acts of hate speech are defended: arguments based on relegating sexual orientation and gender identity to a “choice,” tradition (“we’ve never had this before”), LGBT or “diversity” being imported through the EU and, invocation of “eternal” cultural or religious norms or Scripture. Other tactics are more dissimulated, such as “I have nothing against gay people, I have some friends who are gay, but they don’t act like you.” The latter type is particularly difficult to combat as it is by and large socially accepted;
- There are however ways in which to interpret Scripture in a way that fights hate speech, homophobia, and transphobia;
- Apart from hate speech legislation, on the implementation side a lot of knowledge and education still remains necessary to sensitise government and communities, as hate speech is often not even recognised;
- In terms of online hate speech there is a problem of website hosted on foreign servers that fall under different legislative framework (e.g. US first amendment protection);
- Hate speech is sometimes present even among the LGBT community (interiorised homophobia and transphobia), which can be particularly difficult to fight.
- The implementation of hate speech legislation always hinges upon active citizenship and civil courage.

### 3.2 Online and social media tools to combat hate speech

#### 3.2.1 Anonymity

Whereas anonymity as a promise of the early developmental stages of the internet was its main attraction, most people are nowadays traceable to their physical persona, and the same holds for activists. A clear link between the physical persona of activists and their online profiles may increase visibility and credibility of their message, although it also increases their vulnerability, especially in the face of the many still (semi-) anonymous homophobic and transphobic voices present in cyberspace.

There were different tactics present among the activists at the conference in relation to the question of privacy and anonymity. Some of them had multiple profiles, one being private for friends and the other public (with less or no info traceable to physical persona) used for activist purposes. Others used a specific social platform (e.g. Facebook) for social purposes, while using others (e.g. Twitter) for public advocacy. The architecture of different social media allows for this type of differentiation, as the possible privacy options range from complex and layered (such as Facebook) or constrained to a time interval (Vine), to absent (such as Twitter, Instagram). The stronger the engagement with different social platforms, the more difficult it is to retain anonymity, that is, to have no traceable link between online and physical persona.

It was pointed out that it sometimes serves the message to be anonymous, in order not to be discredited on personal grounds. Due to its nature the internet offers the possibility of inventing a completely new persona (drag) which is a major element in

the blogging community. On the other hand, the ever-growing presence of viral campaigns is predicated precisely on the clear link between message-online persona-physical persona. Moreover, all social media companies deploy revenue models (partially) based on selling personal data to advertisers, creating a strong incentive from their side to establish a trustworthy and stable link between online and physical persona. Moreover, all social media profiles can always and without prior notice be closed by the company that owns it.

### 3.2.2 Useful social media concepts for combating online hate speech

- (Hash)tags: A hashtag is a keyword or lemma and allows for organization by topic, appended to an online post on social media. It is always preceded by the hash (#) sign and offers a way to boost your campaign and reach more followers by linking your post to larger current (trending) themes. It also offers a way to inform larger institutions about your campaign by adopting their hashtag and potentially reduces the distance between activists and public figures/authorities. Pertinent examples are the hashtags #idahot and #nohatespeech. Tags are different from hashtags in the sense that they do not refer to a lemma or category, but rather give metadata in terms of people or locations. However, the usage of tags and hashtags currently seems to converge.
- Calling Out: Publicly commenting on or responding to hate speech by "calling out" the perpetrator. The aim is to focus public attention to the hate speech act through a method of "naming and shaming." Examples are the Anti-Racism Dog that responds "woof woof woof" to every racist post it comes across on Tumblr and the Twitter feed @YesYoureRacist. However, this tactic of reposting slurs may end up giving them even more attention.
- Parody and Memes: There are several modes of what once was called "détournement" that can be used to address hate speech perpetrators in a more entertaining way. Examples are for example the Facebook page of the English Disco Lovers, which is a parody on the English Defence League Facebook page. Other parodic tools are the many meme generators, which allow the deployment of certain emergent "memes," symbols that bind together a certain set of attitudes and speech acts to be combined by specific slogans. Examples of pertinent memes are the Overenthusiastic PFLAG Mother and the Bad Straight Ally.
- No Hate Speech Movement website: The No Hate Speech Movement website offers a set of different possibilities to address no hate speech, one of which is the reporting tool. This allows people to repost not the hate speech itself, but the report of it, this spreading a positive and affirmative message.

# 4. Analysis and development of different modes of action

## 4.1 The Council of Europe and combating homophobic and transphobic hate speech

The basis for the Council of Europe is the European Charter of Human Rights (ECHR), which forms the umbrella of human rights and standards, giving legal guarantees as well as prohibitions.[8] The Committee of Minister (CM) is the decision making body of the Council of Europe, deciding on and guarding the legal instruments employed to further the implementation of equal rights throughout its member states. In order to do so, it has a set of legal instruments, either binding (conventions, charters, agreements) or non-binding (resolutions, decisions, research reports, position papers, speeches statements, recommendations).

Moreover, the European Court of Human Rights, as the highest court of law for all Council of Europe member states, contributes to jurisprudence in many areas of human rights, such as in *Alekseyev vs Russia,* which ruled that "the bans imposed on the holding of impugned marches and pickets had not been necessary in a democratic society" and *Goodwin vs United Kingdom,* which ruled that there are "no significant factors of public interest to weigh against the interest of this applicant in obtaining legal recognition of her gender re-assignment."

Because of its foundations in universal human rights and transnational reach all over Europe, the CoE plays on of the key roles in combating homophobic and transphobic hate speech.

### 4.1.1 Recommendation CM/Rec(2010)5

In this battle, Recommendation CM/Rec(2010)5 on combating discrimination on grounds of sexual orientation and gender identity is of particular importance, as it is the first legal instrument to formulate a series of recommendations to member states concerning the protection of the rights of the LGBT community. It is also the fundamental text for the Council of Europe LGBT Project, which was piloted between 2011 and 2013 in six member states and comprised over fifty activities in total.

Recommendation CM/Rec(2010)5 also has a specific bearing on the combat against homophobic and transphobic hate speech, stating explicitly that "Bearing in mind the principle that neither cultural, traditional nor religious values, nor the rules of a "dominant culture" can be invoked to justify hate speech or any other form of discrimination, including on grounds of sexual orientation or gender identity."[9] It also invited Council of Europe member states to "take appropriate measures to combat all forms of expression, including in the media and on the Internet, which may be

8 The CoE focuses on human rights, democracy, and rule of law, whereas the EU concerns itself with the internal market, a shared currency, and so on.

9 Rec/CM(2010)5, preamble.

reasonably understood as likely to produce the effect of inciting, spreading or promoting hatred or other forms of discrimination against lesbian, gay, bisexual and transgender persons."[10]

### 4.1.2 Case Study: The implementation of CM/Rec(2010)5 in Albania

Albania was one of the six Council of Europe countries in which the LGBT Project was implemented from 2012-2014. A number of local factors played into its success: the general absence of religion in the public debate; a new, progressive government that wants to integrate into the EU; the presence of several LGBT organizations with diverse capacities and focus points. One of the main results of the LGBT Project has been the Legal Review component, which comprised the drafting of a series of legislative amendments including extending the existing partnership law to same-sex couples, (additional) anti-discrimination articles in Labour Code, Asylum Law, and Penal Code, and a draft gender recognition law. All of which are in different stages of the legislative process.

As regards specifically addressing the problem of homophobic and transphobic hate speech, the following project activities may be mentioned:

- Strategic Litigation: project undertaken by Aleanca LGBT comprising a series of trainings for LGBT activities on ECtHR case law and the possibilities for litigation in the Albanian context; a manual with translations from case law; and trainings for the LGBT community with the Commissioner for the Protection from Discrimination on official reporting hate speech.
- Awareness raising campaign in schools: project undertaken by Aleanca LGBT comprising a series of workshops in schools with students, workshops with teachers and school psychologists together with an expert on homophobic and transphobic bullying from the Irish organization BeLonG To; the development of an anti-bullying manual to be distributed in high schools.[11]

### 4.1.3 The No Hate Speech Movement

The No Hate Speech Movement[12] is an initiative of the Youth Department of the Council of Europe and includes the manual "Bookmarks: Combating hate speech online through human rights education."[13] The No Hate Speech Movement is a campaign launched on 22 March 2013, running until 2015, and is based on the conviction of the Council of Europe that hate speech is a threat to democracy and human rights, because it impinges upon people's freedom of expression. The campaign is focused on awareness raising and capacity building in the field of online

---

10 ⌉ Rec/CM(20105, App. B6.

11 ⌉ Detailed analyses of these projects are included in the Desktop Study.

12 ⌉ http://www.nohatespeechmovement.org

13 ⌉ Available online at http://nohate.ext.coe.int/Campaign-Tools-and-Materials/Bookmarks

hate speech, which poses a complex set of challenges in terms of addressing and combating it. It has set the following goals:

- To raise awareness about hate speech online and the risks it poses for democracy and individual young people;
- To promote media and internet literacy;
- To support young people in standing up for human rights, online and offline;
- To reduce the levels of acceptance of online hate speech;
- To map hate speech online and develop tools to combat it;
- To support and show solidarity to people and groups targeted by hate speech online;
- To advocate the development of and consensus on European policy instruments combating hate speech;
- To develop youth participation and citizenship online and associate young people with Internet governance processes.

The Action Day against Homophobia and Transphobia organised on 17 May is one of the campaign tools deployed by the No Hate Speech Movement. This is one of the 10 Action Days organised throughout the year, in which youth activists join forces with LGBT activists to raise awareness about and combat online hate speech.

The Action Hour on May 17, in which the No Hate Speech Movement combined its efforts with the many LGBT activists worldwide campaigning on IDAHOT, comprised a series of activities in which the knowledge gathered from the seminar was put into practice:

- Live video feed in English and Polish through mobile phone camera and YouTube;
- Photo of IDAHOT made with human figures as cover photo;
- Several memes;
- Liking, retweeting and reposting of IDAHOT activities all around the world;
- Reporting hate speech on No Hate Speech Movement Report page;

### 4.2 Challenges in combating LGBT hate speech

Participants were asked to organise their challenges on a scale from easy to difficult to overcome, as follows:

- The easy challenges are usually the ones related to internal education of the LGBT community, addressing ignorance and internal(ised) discrimination. This is also holds for creating new, positive stereotypes for the community and communicating them to the outside, as well as tailoring online communication to the shifting preferences of younger generations to platforms such as Instagram and Pinterest.
- Different from the creation of new positive stereotypes, the battle against older negative stereotypes is considered more difficult, as is opening closed minds (of citizens, journalists, or politicians) or finding straight allies. In this category of challenges that are much more difficult to overcome we also find topics related to political reform, such as introducing new legislation, curriculum reform, hate crime prevention, and the battle against political propaganda. It also includes the organization of Pride Parades.

- The most challenging category is formed by issues related to cultural, ideological, and religious change, such as combating religious propaganda and nationalist discourses, legislation that is grounded in moral and religious concepts (such as marriage), and discourses of eternal morals and natural behaviour. This category is very difficult to immediately address through practicalities, but usually evolves slowly over time as the easy and moderately difficult challenges are overcome in emancipatory struggle.

# 5. Future Initiatives and Possibilities

From the challenges gathered by the participants and the best practices that were discussed during the plenary and group sessions, some of which are described in the accompanying desktop study “Young People's Initiatives to Address Homophobic and Transphobic Hate Speech,” the following future initiatives and possibilities have been formulated by the participants in relation to developing knowledge and solidarity, followed by initiatives and actions in the field of religion; education; and legislation. Different recommendations have been proposed for the three main actors in combating homophobic and transphobic hate crimes: the Council of Europe; national governments; and NGOs.

## 5.1 Developing Knowledge

One of the key opportunities is the development of knowledge, on several levels. Both within and outside the LGBT activist organizations, more specialised knowledge and data on trans and intersex issues are necessary. Second there is a lack of knowledge, in terms of hard data, of the LGBT community about itself. This makes it potentially very vulnerable to marginalization. The creation of hard data sets, aside from a scientific debate on statistical relevance, in itself can already be a major step forward toward policy change.

- Council of Europe:
  - Initiate and/or support national and national creation of data sets on the LGBT community, specifically the trans and intersex communities;
- National governments:
  - Include LGBT-oriented questions in national demographical surveys;
- NGOs:
  - Quantitative and qualitative research within the LGBT community, using easily accessible tools such as Google Forms

## 5.2 Developing Solidarity

The second key opportunity is the development of solidarity, cross-social alliances that can be forged between the LGBT groups and other actors in civil society. The examples adduced during the seminar, and the very structure of the seminar itself, gives great hopes for a further, intensified cooperation between organizations from different areas of civil society.

- Council of Europe:
  - Facilitate contact between organizations related to youth, women's, LGBT, Roma, and disabled persons;
- NGOs:
  - Develop inclusive projects: where do targets and objectives overlap? Create temporary alliances on specific issues as well as long-term cooperation.

These broad recommendation concerning developing knowledge and solidarity may be further focused on three fields: religion, education, legislation.

### 5.3 Religion

Many LGBT activists, especially in Eastern and South-eastern Europe, are faced with a strong religious opposition, and sometimes even undiluted hatred from Catholic, Orthodox, or Muslim clerics.

- Council of Europe:
  - Support, whenever possible, a dialogue between religious communities and the LGBT community;
- NGOs:
  - Assess the presence of religion in the public debate on a local level, designate possible conversation partners from religious communities, and open a dialogue. This can range from exchanging information on policies, an "extremism watch," and so on.
  - As many LGBT community members may struggle with their religious affiliation and/or cultural background, develop methods, strategies, and interpretations of Scripture that would not lead to rejection of the LGBT community, but to its acceptance, such as a humanist interpretation of Scripture, etc.

### 5.4 Education

In the field of education, there are several issues that revolve around questions of knowledge and solidarity. First is the broad issue of homophobic and transphobic bullying, to which many LGBT youth find themselves exposed. On a more political level lies the question of curriculum reform on all educational levels, from elementary school, up to medicine and psychology curricula in universities.

- Council of Europe:
  - Support projects that concern bullying in school, and specifically homophobic and transphobic bullying;
  - Support curriculum reform on all levels of education, with emphasis on high school curricula and psychology and medicine curricula at undergraduate and graduate levels;
- Governments:
  - Develop inclusive school curricula;
- NGOs:
  - Develop anti-bullying projects that include homophobic and transphobic hate speech; connect and organise with teachers' unions, school psychologist associations, etc.
  - Develop modes of non-formal education, e.g. through theatre, art exhibitions, etc.;
  - Initiate meetings and exchanges for parents of LGBT youth.

### 5.5 Legislation

The third field of concern is legislation. Although several ECtHR verdicts and CM/Rec(2010)5 may be useful to persuade governments to implement necessary legislative changes, reality teaches us that unless there is another strong stimulus (such as potential membership of the EU), the government does not easily prioritise legislative change that would benefit the LGBT community.

- Council of Europe:
  - Actively assist local governments in implementing ECtHR jurisprudence and Council of Europe recommendations.
- Governments:
  - Harmonise legislation with ECtHR jurisprudence and Council of Europe Recommendations;
- NGOs:
  - Develop strategic litigation projects with activist lawyers to impose legal reform following ECtHR case law;
  - Emphasise LGBT community as group of citizens with voting power, conduct surveys on political programs as regards LGBT issues, actively inform community on political options;
  - Find allies within the government, parliament, and (political) journalists who will speak out.