Discursive Opportunities Within the Gender Equality Frameworks of Denmark, Hungary, and Germany: How Are the Feminist Ideals of the Istanbul Convention Challenged?

Ida Kirstine Larsen, CCG

Supervisor: Lise Sloth Rolandsen Agustín

ABSTRACT

This project is an investigation of the national gender equality frameworks in Denmark (DK), Hungary, and Germany put in relation to their negative responses to the Istanbul Convention (IC) and its feminist ideals. Moreover, the problem formulation asks: How are negative responses towards gender equality policies in DK, Hungary, and Germany, respectively, challenging the feminist ideals of the IC and its objectives? I have included these particular countries because they represent different gender equality standards in light of their differing gender norms, national histories, and their current rankings on international gender equality indexes. My approach to the investigation of this question relies on a combination of the theoretical approaches of critical frame analysis and discursive opportunity structures (DOS). In this project, these two theories work to uncover the similarities and differences in the use of framing between different national contexts, and, furthermore, explain some of the motifs behind it. DOS also helps explain some of the discursive tools such as 'bending' and 'shrinking', which are often applied strategically in discussions on gender equality policies as a way of shifting focus away from gendered aspects.

The data in this project include a Danish parliamentary debate (May 24, 2013) on the potential ratification of the IC, news articles that disclose the Hungarian politicians' discourse on gender equality and their stance on the IC, and, lastly, news articles, press releases, and a summary from the German parliament debates on the ratification of the IC. The data was chosen on the grounds that it had to show what the reactions towards the convention have been like in terms of potential negative responses in each of the three cases. Furthermore, I was looking for the strongest oppositional actors and their discursive attempts of resistance to the potential implementation of the IC in order to uncover the strongest points of resistance.

My analysis indicates that anti-gender frames are effectively applied in national contexts at all levels of gender equality progression – even in DK, where it is considered part of the national identity. Therefore, I can conclude that the IC and its objectives clashes with national (gender) norms in all three cases one way or another.

The significance of this project lies in its demonstration of different discursive strategies of framing applied in the resistance of the IC. My analysis also provides an insight into the variety of discourses that present challenges to the IC and the connectedness across these discourses between most different cases such as DK and Hungary, as well as the case of Germany which represents a more complex national framework of gender equality given the history of instability and division.

TABLE OF CONTENTS

INTRODUCTION

In 2016, WHO declared that gender-based violence is a *"global and urgent public health priority"* (who.int, 2019). On top of this statement, the Fundamental Rights Agency of the European Union carried out the largest and most comprehensive survey on violence against women (VAW) in Europe in 2012, showing that a large number of women are exposed to violence regularly. Among the 42,000 women, aged 18-74 years, who were interviewed for the survey, 33 % had *"experienced physical and/or sexual violence since she was 15 years old."* (FRA, 2014, p. 21) The report estimated that 13 million women in the EU *"experienced physical violence in the course of 12 months before the survey interviews"* (FRA, 2014, p. 21). These numbers illustrate the severity of the issue of VAW in Europe. Thus, echoing WHO's message of urgency, this data sends a strong signal demanding political action within the field of gender-based violence.

In a European context, the governmental, human rights organisation the Council of Europe (CoE), comprised of 47 member states (CoE, 2019a), set out to protect women's right to live a life free from violence, including domestic violence (DV), by producing the *Council of Europe Convention on preventing and combating violence against women and domestic violence*, also known as the Istanbul Convention (IC). Findings from national reports showed both the magnitude of VAW and DV among the member states as well as the variations in their responses to it, which led the CoE to the decision to create a comprehensive document seeking to harmonise legislation across Europe in order to provide women with equal standards of protection no matter their location (CoE, 2019b).

As Verloo mentions in her book examining opposition to gender+ equality in Europe (2018), Europe is an interesting area to focus a gender equality study on because of its historical engagement with feminist projects initiated by the EU and the CoE (Verloo, 2018, p. 4). Accordingly, the problem formulation of this project asks:

How are negative responses towards gender equality policies in Denmark, Hungary, and Germany, respectively, challenging the feminist ideals of the Istanbul Convention and its objectives?

The logic behind the case selection of these particular CoE Member States is explained in the Methods chapter below.

In saying 'negative responses' I am referring to political actors' resistance towards gender equality in each of the three member states put in relation to the IC. Hence, I am not simply

accounting for the general anti-gender frames of the states, but rather investigating the anti-gender frames' significance and effect in relation to the reaction to the specific gender project of the IC. I aim at establishing the negative responses to gender equality policies; however, my analysis of the negative responses is not exclusive – I have also included positive, pro-gender equality responses, since they are a natural component in the discursive negotiations. I have chosen to investigate nation-specific actors' discourse; the actors were selected on the basis of their engagement with the given national parliament as well as their ability to influence political debates, meaning that their concerns are widely supported and have the potential to impact the outcome of the political debate.

My problem formulation aims at, first of all, accounting for the different kinds of responses found in each of the three countries, i.e., the national gender equality frames. This will be done by characterising the political institutions which have resisted gender equality in the past plus current discursive strategies of resistance and their motivational foundations. Second of all, my problem formulation aims at comparing the discourses of this gender equality resistance in three different member states in order to assess the status and severity of the ostensible European backlash against gender. Thus, the latter aspect of my problem formulation helps to make sense of the remarkable hostility that appears towards an instrument intended to deal with profound issues such as inequality and violence, i.e. the IC, as soon as it centres around gender. I will seek an answer to this issue through a critical frame analysis combined with a discursive opportunity discourse analysis of the anti-gender discourses in three different national contexts.

Rightly, there are multiple layers to the challenges of introducing any convention like the IC. For instance, one could also consider practicalities around including a gender perspective into legislation, or it might be relevant to consider the efficiency of introducing measures from the IC into legislation. Nevertheless, my focus remains on the anti-gender strategies and their efforts to halt progressive gender and equality initiatives, because this approach enables a reflection on various population groups' attitudes towards political 'gender projects' aiming at altering social structures such as the IC.

It is also important to note that I consider my problem formulation relevant in the light of my own, and likely other people's, expectations of Europe as a place where progressive ideas and planning thrives; this assumption corresponds to Verloo's statement, mentioned above, about Europe's historical engagement with feminist projects. Hence, it seems surprising that a backlash against gender equality, and even discussions about the threat of the concept of 'gender', has been able to gain foothold. Within recent years, resistance towards the term gender and anything relating

to gender equality has spread across Europe and generated mobilisations of new strong anti-gender movements opposing gender equality projects such as gender mainstreaming (from the EU) and initiatives like the IC (from the CoE). These movements rely on a common belief which conveys negative messages about gender; e.g.: *"[i]n sum, gender is a code for "moral degeneration"…"* (Kuby 2015 in Villa, 2017, p. 106). Taking a step back, this example of radical opposition does not reflect the resistance towards gender equality initiatives in all corners of Europe. Accordingly, when using the term 'backlash', I am aware of the more subtle anti-gender discourses, which might work against an implementation of the IC simply by prioritising and promoting other values such as liberal approaches to gender equality legislation, which might not resonate with the manner by which the IC presents itself – i.e., as a feminist, socially transformative project.

The process of creating the IC was not frictionless, and perhaps it illustrates the complex and diverse set of challenges limiting cooperation between the CoE Member States on a gender project. Prior to finalising the IC, the CoE put out a flyer describing the process of creating the convention: A special CoE '*Task Force to Combat Violence against Women, Including Domestic Violence*' investigated measures taken to fight VAW on a national level among the member states, which showed considerable gaps between them in terms of prevention, protection, and prosecution processes (CoE, 2010, p. 1). This finding stressed the need to line up cohesive legal standards across Europe (CoE, 2010, p. 1). The overall purpose of the IC was to fill a gap within criminal and civil law responses to VAW and DV (CoE, 2010, p. 2). Additionally, the IC highlights strategies such as awareness raising for the public, special education for professionals, and changing attitudes in regard to gender roles – more specifically stereotyping *"which tolerate or legitimise violence against women"* (CoE, 2010, p. 2).

In a presentation on the drafting process of the IC from 2011, Raluca Popa shared moments in which conflicts occurred and other circumstances that shaped the IC. From an early stage, Germany was one of the strong supporters of the IC and even brokered an agreement with oppositional delegates (Popa, 2011). Regarding definitions of terms related to gender, the working group encountered challenges. For instance, the definitions of VAW as discrimination and a violation of human rights were not readily accepted by several delegations, including Denmark (DK), who argued that not all instances of VAW can be categorised as discrimination or a violation of human rights (Popa, 2011). DK also contested the statement in article 4, part 1 saying that *"particularly women"* should be considered when legislation on violence was made (Popa, 2011). Thus, there were some tensions around the notion of a human rights convention, intended as a protective

instrument, focusing on a single group – i.e., women.

By Popa's account of the drafting process, it becomes evident that the starting point of agreeing on the values put forth in the IC was burdened by the dissimilar perspectives and understandings of VAW. Moreover, it becomes evident from the examples in Popa's presentation that DK, although supportive of the IC in general, did not agree to all of its terms at once. This is an important point to make, because it does not seem nonsensical that resistance would linger still after its adoption regarding some member states' will to fully integrate it into their national VAW and DV legislation.

Since the IC opened for signatures in 2011 and entered into force in 2014 (CoE, 2019b), it has clearly not delivered the desired changes yet, considering the WHO and FRA's subsequent demands for improvements within the field. Today, 45 member states plus the EU have signed the IC, however, only 33 member states, not including the EU, have ratified it (CoE, 2019c) [1].

Considering the differences regarding national legal responses to DV, one can imagine how a varied range of challenges to the prospect of a widespread implementation of the IC might occur. Thus, the IC needs to be applicable in, at times, contrasting settings, where certain states may need to revise constitutional laws, whereas other states may need encouragement to keep pushing for more gender equality. It can be problematic to have each of the member states interpret and implement the IC according to their own gender norms. However, the aspect of how it is implemented and to which effect will not be explored in this project. The interesting aspect in this project will be to look into differences, and perhaps similarities, between some of the European countries in terms of their attitudes towards gender equality as well as their political will to accommodate the IC. More specifically, the connection between the national gender and gender equality frames and hindrances of the success of the IC project might appear through my investigation, depicting national anti-gender frames as an aspect of the European backlash against gender and the resistance towards the IC. However, I will not insist on providing any conclusions based on my analysis regarding public attitudes towards gender projects, the status on gender equality in Europe, or the manner and degree to which the IC is effectively implemented into national legislation. Additionally I will refrain from analysing the rationality of national policies, or the IC itself, since the term 'rationality' is often related to public policy literature and investigations of their content's compatibility with the goals in a policy process (Lombardo and Meier, 2009, p. 138). More so, I will focus on the background of the negative reactions in three different cases –

---

[1]Status as of May 27, 2019

how it is framed and expressed through discursive strategies which might impact the acceptance of the IC.

As part of my theoretical framework, the concept of "gender ideology" discourse will be included to help explain and characterise the resistance discourses against the IC. "Gender ideology" discourse is a negative, strategical framing of gender taken on by anti-gender movements and political actors across Europe. It consistently points to gender roles' reliance on and restriction to biological differences between two sexes (FRA, 2017, p. 21). The newly emerged anti-gender movements in Europe have applied the "gender ideology" discourse in an effort to *"deny women's reproductive rights, gender equality and sexual education, same-sex marriages and other aspects of gender progressive politics."* (FRA, 2017, p. 21) Adding to these ventures, they also claim that women act as main aggressors, to the same degree and severity as men, in occurrences of DV (FRA, 2017, p. 21). To this end, it becomes clear how these movements have potential to harm projects such as the IC; namely because they base their line of argumentation on exaggerated interpretations of data or even wrongful narratives, which enables them to distribute powerful messages about the dangers of 'gender', i.e. resorting to scaremongering. This strategy will be discussed further in the literature review below.

LITERATURE REVIEW

In Krizsán and Popa's chapter, *Contesting Gender Equality in Domestic-Violence Policy Debates: Comparing Three Countries in Central and Eastern Europe* from Verloo's book *Varieties of Opposition to Gender Equality in Europe* (2018), they explain that gender equality studies generally tend to investigate *"the existence of opportunity structures that are favorable to progressive policy change in the field, such as favorable governments, women's policy agencies, women parliamentarians, or international actors…"* (2018, p. 99). However these studies do not provide a complete description of the issue since they only account for one side of the gender equality struggle, namely the initiatives towards more gender equality policies and the actors supporting it. Verloo calls this tendendcy *"a progress bias"* (2018, p. 4). Just like Krizsán and Popa argue, the opposite approach of investigating the issue, i.e. looking at anti-gender discourses and actors, is equally interesting and pivotal for the understanding of political gender equality progress, or absence, within the field of DV (Krizsán & Popa, 2018, p. 100). Thus, my project will approach the subject from the perspective of discursive opportunity structures that are *non* favorable to

progressive policy change in the DV field. By '*non* favorable discursive opportunity structures', I am referring to the discourses that nourish the backlash against gender equality.

In the book *Anti-Gender Campaigns in Europe: Mobilizing against* Equality (2017), Paternotte and Kuhar's chapter on *"Gender ideology" in movement: Introduction* investigates *"national manifestations of a transnationally circulating movement against "gender ideology"."* (p. 2) One example is '*The Guards',* a Slovenian movement, claiming that they are guards of *"a natural family as a union of a man, a woman and children"* as well as *"matrimony union between a man and a woman"* (Paternotte and Kuhar, 2017, p. 1). To that end, they support children's right to have both a father and a mother (Paternotte and Kuhar, 2017, p. 1), which is a statement that seeks to defy deviations from traditional gender roles and family constellations. *The Guards* from Slovenia is not a unique movement. There are similar groups in each European state working against the phenomenon of "gender ideology" or "gender theory" – an agenda that essentially conveys notions contesting gender equality and LGBTI rights (Paternotte and Kuhar, 2017, p. 2). To spread their message, these movements mobilize campaigns and are, in many cases, inspired by each other in relation to carrying out silent protests and other activities that will capture media attention (Paternotte and Kuhar, 2017, p. 2). According to Paternotte and Kuhar, such anti-gender campaigns have emerged all over Europe and *"bear a striking resemblance"*, meaning that they *"share discourses, strategies and modes of action across borders; (…) and are increasingly connected transnationally…"* (2017, p. 2)

So far, research on anti-gender equality mobilisations has predominantly covered places elsewhere in the world. The American Christian Right has been subject of attention in an ongoing academic debate discussing *"counter-movements and culture wars."* (Paternotte and Kuhar, 2017, p. 2) The research on this subject, covering mostly North- and Latin America as well as Africa, points to *"conservative understandings of religion"* as a dominant factor in the opposition to gender equality, which is then connected to *"an ongoing process that seeks to reaffirm religion in public space."* (Paternotte and Kuhar, 2017, p. 3) In continuation of these two ideas, scholars link the religious aspects to nationalism and defending national sovereignty (Paternotte and Kuhar, 2017, p. 3).

Academia has only recently shown interest in the European mobilisations. The reason for this can be ascribed to the *"recent character"* of the movements, increasing their activity level and banging the drum for anti-gender equality (Paternotte and Kuhar, 2017, p. 3). Additionally, a general belief that Europe was on an unwavering journey towards complete gender- and sexual equality has

prevailed among scholars and actors within the field; if anything, resistance has been thought of as a remnant of the past and limited to Eastern Europe and Catholic states (Paternotte and Kuhar, 2017, p. 3). Accordingly, my project is particularly relevant since it examines this incomplete discussion of the backlash against gender equality progression in Europe. The purpose of this project, then, is to fill the knowledge gap regarding the resistance towards gender equality in a European context and relating it to the negative reactions towards the IC. The latter endeavor – integrating the IC into the academic discussion about the resistance – adds another unexplored dimension to my project. Existing literature on feminist politics has emphasised the importance of contexts as highly relevant for the understanding of the potential success or failure of feminist projects, yet, has left *"Western and European elements of this context undertheorized"* (Verloo, 2018, p. 5). Verloo explains it further, saying that the *"Eurocentric and Westerncentric nature of much of the scholarship has meant that these aspects of the context are taken for granted rather than articulated, described, and analyzed."* (2018, p. 5). While this tendency is problematic in itself, there are additional threats, at this point in time, due to the recent occurrence of new as well as old threats appearing in political discussions about gender (Verloo, 2018, p. 5). Thus, more scholarly attention towards the activities and movements connected to gender politics in Europe is needed. In connection with the low priority given to a European perspective in feminist and gender+ equality scholarship, I can conclude, after extensive research into the field, that the subject of the CoE member states' resistance towards the IC seems to have been given no attention in the literature either. Hence, my study seeks to provide an insight into this neglected aspect.

So far, I have used 'negative responses' and 'resistance' towards the IC interchangeably with 'backlash' against gender; both of the former phrases could fall under the latter term 'backlash'. Nevertheless, they do not quite carry the same meaning in the sense that a backlash might be associated with radical and even offensive reactions, whereas the other two phrases might depict a more passive reaction. Furthermore, 'backlash' indicates a reverse process of progress. Although, these scholars account for the extensive and transnational manifestation of a backlash against gender equality across Europe, this project does not rely on presumptions about the character of any backlash found in any of my three cases – given that it makes sense at all to identify the most prominent anti-gender discourse as a backlash in accordance with the notion that progress has happened in the first place or that a society has taken a step back from potential progress. Conversely, my analysis will deal with the question of resistance towards gender – first from a national perspective and then from a European perspective – from a neutral starting point whereby

the circumstances and debates around the IC can be positioned and discussed in relation to a potential backlash tendency.

1. METHODS

My focus on gender calls for a theoretical approach that is able to accommodate a feminist, i.e. critical, perspective and this is why I will apply discursive opportunity structures (DOS) as well as critical frame analysis (CFA). This approach will help me to achieve a critical deconstruction of the frames on gender and the IC within the discourses examples that my data is composed of. It will also provide a research design for the project that allows me to explore anti-gender frameworks and what kind of frames the oppositional actors are situated in while arguing their side of the case, i.e. the side that seeks to undermine the gender values and objectives of the IC. The DOS approach and CFA enable me to provide a more complete analysis than the traditional, mainstream discourse analysis theories would do, due to their lack of a gender perspective. The comprehensiveness of the mix between these two related theories, DOS and CFA, is also demonstrated in Lombardo et al.'s book *The Discursive Politics of Gender Equality* (2009), in which different theorists, among others Carol Bacchi, Mieke Verloo, and Jacqui True, have contributed with a chapter where they explore subjects related to framing gender in politics by using CFA and DOS. Furthermore, and in agreeance with Krizsán and Popa's methodological reflection, the research design of this project relies on analyses of the variety of anti-gender discourses found in three European countries;

> *"The variety of the opppositional frames described (...) demonstrates the importance of a discursive analysis of opposition to gender equality in the field of domestic violence. It will allow us to gain a complex and gendered understanding of what seems to be a Europe-wide consensus on regulating domestic violence, and also help to identify more subtle forms of opposition to gender equality that otherwise might not be evident."* (Krizsán & Popa, 2018, p. 103)

Krizsán and Popa also apply CFA in their study, though they pair it with policy process tracing (2018, p. 99), which indicates that CFA is very relevant and function well when paired with another theoretical approach. What is more, Krizsán and Popa emphasise that the approach of a *"discursive analysis"* is especially relevant for an investigation related to gender equality in the field of DV. Thus my analysis will be guided by a discourse analysis on the varieties of anti-gender discourses in the Danish, Hungarian, and German contexts, which in turn will help me answer the main question about the negative responses towards gender equality policies in Europe in relation to the feminist

values of the IC and its obejctives. Additionally, it is important to point out that my discourse analysis approach will not rely on a textual analysis that goes into detailed, systematic sentence- and grammatical analysis levels as with Fairclough's critical discourse analysis for instance.

Referring to Goffman (1974), Lombardo et al. state how *"[f]rame analysis (…) aims to identify the major cognitive schemata through which people interpret and give meaning to reality, or communicate about it…"* (2009, p. 11). Moreover, a *"frame is (…) 'a way of talking and thinking about things that link idea elements into packages'."* (Lombardo et al., 2009, p. 11) This description of my approach fits perfectly with that of social constructivism. For one thing, social constructivism considers social categories, such as 'masculinity', as dependent on *"time and place."* (Bryman, 2016, p. 30), which is pivotal for my investigation which offers an insight into recent discourse practices regarding gender in three different places. Moreover, Bryman cites Potter (1996) on social constructivism saying: *"The world … is constituted in one way or another as people talk it, write it and argue it."* (2016, 30) This quote perfectly illustrates the fit between social constructivism and my approach, since it is very clear that this ontology considers knowledge to be subjective. What is more, our *"world"*, as Potter states, i.e., our reality, is subjective and dependent on how *"people talk it"* and *"argue it"*, which essentially echoes Lombardo et al.'s definition of frame analysis cited above. Therefore, I have reason to put my project in the ontological category of social constructivism. The settlement of the ontological perspective is important in relation to creating cohesiveness between my theoretical approach and my choice of data. Adding to that, my analysis will rely on qualitative data, which is ideally placed within social constructivism. To that end, I am not providing a cost-benefit analysis of rational decision making in politics.

1.1 CASE SELECTION – DENMARK, HUNGARY, AND GERMANY

In this section, I will account for the selection criteria and the connection between the cases. By doing a comparative case study, I will be able to attend to the puzzle of Europe's unexpected departure from its progressive path towards gender equality – manifested through the governing European institutions' gender promoting initiatives as stated by Verloo (2018, p. 4), referred to above; i.e., the comparison of different CoE member states will enable me to detect relations between the different frames and their effect on the complex process of implementing the IC all over Europe.

The reasoning behind choosing three member states was to represent some of the differences found across Europe. Accordingly, DK and Hungary were selected based on the criteria that they

each represent gender regimes of opposite ends of the political gender equality spectrum with all that it entails (more on that below). Then, Germany was selected based on its complex gender discourse, which makes it difficult to place on any such gender equality spectrum; hence, the case of Germany provides my analysis with a less predictable outcome than if I were to base the analysis on just DK and Hungary. There are various differences that can come into play in terms of a comparative analysis such as separate regions of Europe, levels of democracy, relationship with the European institutions (the EU and the CoE), economic status, predisposition for religion's influence, and sizes of the countries. However, the differences that are interesting in relation to my project are the ones related to gender, social structures like family and traditions of gender equality, i.e. norms, as well as political progressiveness in terms of gender equality policies. Henceforth, I will provide a short account of the gender regimes in each of the three countries below, since the selection of the cases depended on this factor.

Another aspect of choosing countries suitable for my particular project was the criteria on different social structures, especially in regard to norms related to family-life. I see this as an important aspect since family norms quickly become intertwined in policy making and perceptions of moral standards, which can affect social policies in general. Moreover, my theoretical approach of DOS and CFA leads me in the direction of the topic of norms; so the national gender frames and political discourse related to social policies in the three cases become independent variables for illustrating potential discursive gender resistance strategy, i.e. the dependent variables, within the frames that ultimately affect attitudes towards the IC.

In extention to that, addressing DV by introducing policies against it can be challenging in a European context, since this action can be perceived as an intrution into the privacy of family life in societies where traditional family values are widely accepted as part of the fundamental social norms (Krizsán & Popa, 2018, p. 98).

Though I am including three cases, each representing different contexts, I will not be able to generalise on the whole of Europe's attitude towards the IC. Nevertheless, there is a possibility that my analysis of these particular three cases can provide a greater insight into the varieties of reactions towards the convention, and, upon that overview, I might also account for any similarities between the three cases and thereby show a tendency in the gender equality resistance discourse, which can help to clarify my main question.

Below I will account for the selection criteria of each case and hereby shortly introduce their national gender regimes. A more complete account of their distinct national frames will be provided in the first part of my analysis.

a) Denmark

DK is included because of preconceptions about its secular, highly democratic and liberal, as well as progressive status in regard to gender equality standards, not least on a global level, where DK is thought of as an advanced state with pioneering gender practices in certain areas. Since the 1970ies, gender equality has officially been on the political agenda and it has also been given special attention in the form of separate institutions (Borchorst and Dahlerup, 2003a, p. 9). Alongside the other Nordic countries, DK is considered to be one of the most gender equal places in the world (Borchorst and Dahlerup, 2003a, p. 9). What is more, the Nordic countries, and especially the three Scandinavian countries (DK, Sweden, and Norway), are considered to be more or less homogeneous because of their comparable socio-economic development, their legislation, and the fact that these countries were the first ones to surpass the 30 % threshold of women's representation in parliament (Dahlerup, 2018, p. 190). Despite the uniformity represented by the Nordic and Scandinavian countries, there are fundamental differences between them, which explain my choice to include DK as a case in this project over the option of choosing another Nordic country. Analyses on the attitudes towards gender equality focusing on both the population and parliamentarians have provided interesting results; they showed that the Danish politicians differ from their Nordic colleagues by being less gender equality oriented (Borchorst and Dahlerup, 2003a, p. 18). While the Swedish politicians are competing over who is the strongest supporter of feminist initiatives, gender equality is on the low end of Danish politicians' priority list (Borchorst and Dahlerup, 2003a, pp. 18-19). Comparing the public debates between DK and Sweden also reveals differences in the gender equality discourse: In Sweden, they like to point out that they have a lot of work to do before gender equality is reached, whereas it is a common belief among the Danes that gender equality is more or less achieved (Borchorst and Dahlerup, 2003a, p. 19). To that end, several scholars have pointed out, how gender equality progress seems to have come to a halt in DK with no recent significant developments in Danish legislation in this area (Borchorst and Dahlerup, 2003a, p. 9). This is also what Dahlerup stated in her article from 2018: *"Denmark used to be among the global forerunners with regard to gender equality, but to the surprise of many international observers, stagnation has occurred during the last few decades with regard to gender equality reforms."* (p.

189). Furthermore, DK has dropped several positions on the Global Gender Gap index, where it now placed at number 19, whereas the other Nordic countries are found at the top as number 1, 2, 3, and 4 (Dahlerup, 2018, p. 189).

With the downgrade of DK as a global frontrunner in the field of gender equality in mind, the criteria for selecting the case intended to represent the progressive countries of Northern Europe no longer relied on the sole component of progressiveness. Instead, I was able to expand the selection criteria in order to provide a more nuanced case which might depict some of the challenges that can arise in the gender equality discourse in a country that is recognised as (and likes to promote itself as) being ahead of the rest of the world in the field of gender and equality. Accordingly, this was an important element in the selection process, where the choice to include DK was based on its capacity as a case to provide my analysis with more nuances as well as a paradoxical perspective, which is more interesting in relation to my problem formulation than other more straight-forward feminist frames.

b) Hungary

As a counterweight to the relatively progressive state of DK, Hungary is included in order to represent another group of the member states, which are more reliant on traditional norms in their legislation. While *"Danish identity is centred on gender equality, and political discourses from both left and right consider gender equality to be a fundamental element of Danishness. (...) Hungary (...) displays an almost entirely genderless national identity."* (Agustín and Sata, 2013, p. 71)

After examining three countries in Central and Eastern Europe, namely Hungary, Poland, and Romania, Krizsán and Popa (2018) found that there were common demoninators in regard to gender equality. First of all, there are cultural elements recurring in the three cases, such as attitudes engrained in their societies which condone discrimination towards women and even DV (Krizsán & Popa, 2018, p. 105). The fact that VAW is accepted as a norm is linked with a dominant orientation towards family as well as an inherent insitence on individual privacy from the state and other institutions (Krizsán & Popa, 2018, p. 105).

Thus the norms that make up the gender regime in Hungary are largely discrimination towards women and putting the institutionalised entity of 'family' first and, lastly, respecting privacy, which can be a hindrance in regard to dealing with DV on a political level. These norms have led me to select Hungary as my second case study, because they symbolise a gender regime and a political

discourse that are not only different to those found in DK, but, perhaps, they even clash with the Danish norms. This prospect of providing an anlysis of polar opposite cases was the main criteria for selecting the two first cases, since it is interesting in relation to my main question to illustrate the variations of contexts that the IC is confonted by. In saying 'polar opposites', I am referring to a European context, meaning that these two cases represent the diversity found in Europe as oppose to the differences that one might find beyond this region. Likewise, Agustín and Sata (2013) examine DK and Hungary as *"most different cases"* in their investigation of political discourse on gender equality (p. 60). They argue that, in their investigation, DK represents *"the advanced Scandinavian countries"*, whereas Hungary represents *"the new Eastern members of the EU."* (Agustín and Sata, 2013, pp. 60-61)

c) Germany

Germany's history can be characterised by instability and division within the nation's own borders; these factors are quite unique, and therefore Germany is especially interesting to do a case study on, since the country's history has also had an effect on the current attitudes towards gender.

The gender regime found in Germany is heavily reliant on its history; Germany's history has made up a society which is highly sensitive to rivaling ideological expressions and notions on ethics, especially ethics within legislation regarding social structures such as family and gender equality. Furthermore, gender-identities which do not fit with dichotomous stereotypes and upset traditional structures and challenge status quo are thus viewed as a threat to the nation and its cultural norms by the German anti-gender movements. Moreover, the nation's experience with past restrictive and oppressive ideological governance fostered resentment towards governmental interference in the private lives of the people, which has also had a noticeable effect on the gender debates in Germany. Villa (2017) explains that, overall, Germany has made great advancements towards more gender equality. Several international treaties have been signed and discriminating laws have been abandoned (Villa, 2017, p. 101). Nevertheless, there are strong opposing streams both among the public and within politics.

Villa states that the current German anti-gender discourse is positioned within *"broader political dynamics (especially right-wing-populism)"* (Villa, 2017, p. 100). She also argues that the *"increased visibility and political relevance of (...) complex gender(ed) persons as well as their cultural and political expressions are "correctly" understood by those who fight them"*, but their tactic, then, is to apply populist rhetoric in an effort to *"ridicule them as "academic", (...) artificial,*

ideological, perverse/sick, dangerous, elitist" etc. (Villa, 2017, p. 100).

Paired with the presence of other resilient perspectives, such as Eurosceptic and Xenophobic ones, Germany makes for a complex and ambiguous case study, which does not present homogeneous outlines of society and ideological agreeance on (gender) norms. For this reason, I have included Germany in my project – to counterbalance some of the polarising, and perhaps assumed, entities in a discussion comparing the first two cases of DK and Hungary.

All the circumstances mentioned above will be discussed further in the first half of the analysis on the German context and gender discourse (chapter 3.3.1).

There might be predictable characteristics and oppositional discursive strategies in regard to the comparison between the Danish frames and the Hungarian frames i.e. preconceptions about the progressiveness in terms of gender policies and gender norms. Nevertheless, the contrasts between these two states facilitate a multidimensional analysis, and, what is more, the diversity of discourses within the span of these two contexts will indicate to what degree the IC needs to accommodate varieties of gender equality resistance. Furthermore, the addition of the German context to my analysis will not only provide an insight into the gender discourse of one of the most dominating nations within transnational, European projects, but it will also depict the struggles that gender equality advocates might encounter in a nation with an exceptionally complex history and conflictual social (gender) norms.

1.2 EMPIRICAL DATA

In this section, I will reflect on my choices regarding data, my selection criteria, and the limitations of accessing certain data.

The search criteria and starting point for all three cases were the same – it had to cover the given national debate about the IC, and, more specifically, it had to show what the reaction towards the convention has been like in terms of potential negative responses. Furthermore, I was looking for the strongest oppositional actors and their discursive attempts of resistance to its implementation in order to uncover the strongest points of resistance in three different contexts, which will help demonstrate the, presumably, different degrees of aggressiveness of anti-gender discourses within the overall European context. As, Lombardo et al. state: *"… actors can have very different access to resources and power positions, which affects the role they play in frame production"* (2009, p. 13) I have chosen to provide data on the discourses of actors who are both resistant towards the IC and also found in the most powerful positions and with the greatest access to resources in terms of

"frame production". To that end: *"Public institutions such as (...) parliaments and bureaucracies have a strong role in fixing concepts, and they usually fix them for longer periods of time."* (Lombardo et al., 2009, p. 13) In a similar vein, Krizsán & Popa (2018) refer to *"veto player"* (p. 103) – anti-gender actors, who are able to block policy progress (elaborated in the theories chapter). This is one reason, why my data differs for each of the three cases – namely because the elements of *"resources"* and *"power positions"* of the oppositional forces differ in each case. In DK and Hungary, anti-gender movements have not gained ground compared to the German anti-gender movements which seems to have more political influence and exposure in regard to national gender policy debates. This selection of data is not based on assumptions about each country and where their national gender equality resistance is most likely to be found. On the contrary, my research into the country contexts departed from the same starting point: looking into every area in society which might represent negative attitudes towards gender equality, and specifically the IC; these areas included political and non-political institutions as well as religious groups. Thus, upon uncovering the three cases' national contexts, I was able to identify the strongest and most influential points of resistance in each society. Accordingly, the most relevant data for my investigation – i.e., the data on the strongest discursive resistance towards the IC – is found in different areas and is thus retrieved from different kinds of sources. Moreover, it makes more sense to investigate the resistance towards the IC based on parliamentarians' discourse in the Danish and Hungarian cases, whereas it is more reasonable to consider alternative anti-gender actors' discourse in the German case. Though I will not be able to compare the results from analyses on the data one-to-one due to this difference, my problem formulation allows for an open empirical approach since I do not rely on a single kind of actor or institution in order to investigate which anti-gender discourses are the most established in different national contexts; plus, it is part of my findings that there are comparative differences in where the major resistance is found.

Thus, the cohesive factor in my data is that it illustrates decisive political discourses that affect the gender equality debate in a negative direction in regard to the IC. As long as my data provides this perspective, I will still be able to characterise the variations of resistance and compare the frames that they are derived from despite the fact that my data is skewed in terms of sources of the discourse.

Furthermore, I encountered limitations in the search of data given that I am able to read the transcripts from the Danish parliamentary debates, and this is not the case with the Hungarian political debates, which have not been translated either. Therefore I have had to rely on news media

articles that have provided recaps of the Hungarian gender equality debate on the IC as well as translations of quotes from the Hungarian politicians. Though I have access to more extensive and detailed data in the Danish case than I do with the other two cases, I decided that this source of data would be sufficient data to analyse for the purpose of this project. Thus, the German data also consist mainly of English articles with translated quotes. More reflections on the data limitations and how I counteract them in each of the cases will be provided below.

What is more, and as mentioned above, my analytical approach, by which I am applying DOS and CFA, will not be as systematic or textually confined as a traditional discourse analysis is. Therefore, my research design outweighs the skewness in my data, since I do not need access to the same level of textual details with CFA as I would with CDA for instance, and this enables me to compare the findings from the three cases still. Moreover, I am able to compare them since all three case analyses aim to deconstruct the frames from which the negative reactions towards the IC are derived.

a) Denmark

In the research process I was unable to find any information on established or well-known anti-gender movements or actors in the Danish context. This, however, does not imply that there are none, but it does warrant my decision to focus on the political parties in DK as the main actors in terms of resolving gender equality issues. After searching for both newspaper articles as well as academic articles on resistance towards gender equality in DK, and even searching on specific topics such as the fathers' rights movements which are prominent in other countries, no substantial material, or even comments, on anti-gender movements appeared.

For the reason given immediately above, I will analyse a parliamentary debate in the Danish case. This particular debate discusses a proposal to have the Danish government sign and ratify the IC as soon as possible. The debate took place on May 24, 2013, and DK eventually signed the convention on October 13, 2013; it was ratified on April 23, 2014 (CoE, 2019c). The proposal was put on the agenda by Enhedslisten (a far left-wing party). In the debate, politicians from both wings partake and articulate their party's opinion on the subject of the IC. Therefore, the transcript from this particular debate is ideal to rely on for my analysis.

As an addition to this debate, I will include a response letter written by Mai Mercado (Minister of Children and Social Affairs and member Konservative – a right-wing party). Her letter is a response to an inquiry on GREVIO's criticism of Danish legislation, which the expert group did not think

was sufficient in its protection of mothers and their children in terms of shared custody between the mother and the violent father. Mercado's response letter was sent on October 4, 2018. Thus, her letter provides an insight into the more recent discourse surrounding the IC in DK.

The data used to analyse the Danish case is in Danish. Therefore, the citations in my analysis chapter from this data set are translations (the original Danish versions are provided in the footnotes).

b) Hungary

As with the research process on the Danish case, I did extensive research to find different groups in the Hungarian context with anti-gender agendas. Nevertheless, the result of my research was quite similar. Although a fathers' rights movements does operate in Hungary,
'Apák az Igazságért Kh. Egyesület' (Fathers for Justice Association) which claims that men are disadvantaged in situations of divorce in terms of getting custody of the children, it is not mentioned in the academic literature related to resistance in Hungary that I have gone over, nor does this movement appear in any of the news media articles on the topic. Furthermore, in their chapter *Anti-gender discourse in Hungary: A discourse without a movement?,* Kovátz and Pető (2017) determine that there is no *"palpable anti-gender movement"* in Hungary yet (p. 127). According to Kovátz and Pető, this absence might be due to the fact that *"progressive actors and voices in Hungary are weak."* (2017, p. 126). Hence, the most prominent resistance appears in political debates. Adding to that: In order to analyse the most *"powerful"* and *"resourceful"* actors' reaction towards the IC in the Hungarian case, I will include news media articles that account for the political gender and DV debate in Hungary with quotes from Hungarian parliamentarians including Viktor Orbán (Prime Minister). The articles are all in English, which means that the quotes have been translated. Therefore, I have included a number of articles, which might overlap in the sense that they cover the same event, but this is a way of ensuring that I am not including quotes that have been translated incorrectly by a biased source. It was difficult to find relevant articles, i.e. ones that dealt with the Hungarian politician's reaction to the IC and these articles provide scarce data of the actual discourse among parliamentarians correlating to my data for the Danish case. Nevertheless, I managed to find some, but also articles that account for the general gender discourse among Hungarian politicians and quotes from them which reveal their attitude towards national gender policies. The articles are retrieved from different news sources: *The Guardian, The Budapest Beacon, The Hungary Journal, Heinrich Böll Stiftung* foundation, and *Hungarian Spectrum*; the

latter features analyses of Hungarian news edited by Eva S. Balogh, who previously taught East European history at Yale University. I will be able to use the politicians' comments on gender in general, provided in the articles, to support my analysis of the Hungarian case and make sense of their reaction towards the IC this way.

On the one hand, I realise that there is a risk of neglecting nuances and inclusion of different perspectives in my analysis due to the limitations of news articles. Furthermore, one might argue that such media outlets have an interest in or a tendency to emphasise negative reactions and the frustrations connected to it rather than the positive ones. This implies that the resistance to gender equality and the IC would be depicted more intensely or more exclusively in the media than it would in the actual parliamentary debate itself for instance.

On the other hand, I will minimise the risk of lacking nuances by also relying on secondary literature. Moreover, secondary literature, such as scholars' studies on Hungary regarding similar topics, will help to substantiate the analysis of my primary data for this case: the media articles. By including both kinds of sources in my analysis I am able to look for parallels between the media articles and the findings from the academic articles on gender equality debates in Hungary. This way, the secondary literature becomes a measuring device for me to compare the statements from the media articles by.

c) Germany

Unlike the Danish and Hungarian cases, there are several influential anti-gender actors in Germany. Although, it is difficult to assess the extent of the different sources' effect within the anti-gender framework operating in Germany, it is evident that anti-gender frames are shared and tightly connected between political actors, social movements/civil society organisations, and intellectuals.

In my extensive search for gender discourses and resistance towards the IC in German debates, I was limited to English sources, which meant that I was unable to include neither the full transcript of the parliamentary discussion on the topic nor the German anti-gender movements' texts, since both sources required comprehensive translation resources unavailable to me. Nevertheless, debates about the German sexual violation reform, the German "No means no" campaign, as well as the incident in Cologne on New Year's eve are all related to each other, and, more importantly, these events on sexual violations and women's rights were essentially part of a discussion about the feminist ideals of the IC – a discussion pushing the German ratification process ahead. Therefore I will analyse the discourses surrounding these events, since they function as discursive opportunities

in the overall German women's rights debate as well as a debate relating directly to the German society's recognition of the IC.

As with the Hungarian case, I will include second-hand sources in the form of a few news articles. In this case, the articles are retrieved from Washington and they address the incident of the mass assault on women on New Year's Eve 2015 in Cologne and how it relates to the debate on the sexual assault reform as well as the 'No means no' campaign. These articles also contain a few quotes from German politicians commenting on the debate, which will help indicate the political actors' attitudes towards the correlation between the Cologne incident and the reform. The last source is Weber's article *The German Refugee "Crisis" after Cologne: The Race of Refugee Rights* (2016), which contains a few translated quotes from politicians from the parliamentary debate on the rape law reform. This will then depict the criticised aspects of the political gender discourse.

2. THEORIES

2.1 DOS AND CFA

In their chapter *Stretching, bending and inconsistency in policy frames on gender equality: Discursive windows of opportunities* (2009), Lombardo and Meier discuss theoretical approaches to critical frame analysis (CFA) and how they differ from theories on public policy models which are founded upon assumptions about intentionality and rationality in processes of selecting appropriate policies (p. 140). Instead, CFA assumes that *"unintentional"* frames have *"infiltrated policy formulation"*, meaning that these frames affect both the representations of and the solutions to a given problem (Lombardo and Meier, 2009, p. 140). Furthermore, Lombardo and Meier refer to Bacchi (2005), saying that *"Frames are commonly conceived as the subject's unintentional representation of reality."* (2009, p. 140). According to this understanding of frames, our attention is guided by a *"socio-cultural bias"* which tends to focus on certain aspects of our *"social reality"* while ignoring others (Lombardo and Meier, 2009, p. 140). This argument then implies that policy actors may end up representing a policy problem in a way that is more biased than they intended to, simply due to the infiltration of their socio-cultural frames (Lombardo and Meier, 2009, p. 140). To that end, Lombardo and Meier claim that there is a current trend within gender equality policymaking whereby the problems are 'ethnitised' (Lombardo and Meier, 2009, p. 140). Hereby, issues of certain subgroups are highlighted, for instance in relation to *"schooling, the job market or violence"*, which implicitly stigmatises the particular group, and, at the same time, the majority is

presented as the norm that is not affected by the issues in the given policy area (Lombardo and Meier, 2009, p. 140).

To explain DOS, Ferree (2009) begins by accounting for the surrounding concepts such as 'frame work' and 'frameworks'. She states that *"framing creates the known world: it actively gives concepts meaning by embedding them in networks of other more or less widely shared and practically relevant meanings, which are what I call frameworks."* (Ferree, 2009, p. 89) Thus, the 'frame work' is the work of putting meaning into the larger scheme of 'frameworks'; i.e., the former concept connects notions about certain social actors and relations into a somewhat uniform package, which comes to be decisive for the kinds of actions that are perceived as necessary, possible, *"and effective for particular actors."* (Ferree, 2009, p. 89) The point of frames then is to *"draw connections, identify relationships and create perceptions of social order out of the variety of possible mental representations of reality swirling around social actors."* (Ferree, 2009, p. 89) Accordingly, this understanding of frames seems to be partially derived from the understanding of frames in CFA in the sense that there is a common notion that frames consist of an *unintentional* element or, at least, a factor of subjectivity in the way that actors navigate within frameworks. This argument about subjectivity is also supported by Ferree's statement above about connecting concepts and social actors into one package, which then directs *particular actors'* ideas of what the sensible actions are. What is more, Lombardo and Meier (2009) and Ferree (2009) both use the concepts of frames and discursive opportunities interchangeably in their explanations of CFA and DOS, which is a strong indicator of the link between the two theories, which makes it easy for me to merge the two in my analysis without risking any sort of fractioning.

In terms of the framework of politics, which is the framework I am addressing in this project, there are different elements highlighted in regard to CFA and DOS respectively, but both aim at positioning the theories in relation to other theoretical approaches. The difference is that Lombardo and Meier explain CFA in relation to other theories within the field of policymaking, whereas Ferree relates DOS to a different discipline by drawing parallels. Despite the different approaches to defining the theories' place in a theoretical framework, both accounts are relevant, since they cover aspects that are equally useful in my analysis. Lombardo and Meier's placement of CFA among other theories dealing with policymaking and the rationality behind it is useful because it explains the nature of political discussions of social issues, which will be highly relevant in my discussion of VAW in different contexts where the exact same issue might be represented differently. Ferree goes

into a discussion of practices within the political discourse discipline, which shapes behavior, debates, and decisions. This discussion helps to explain my understanding of the IC as a discursive opportunity as well as part of an overall DOS framework.

CFA deals with public policy processes from a different perspective than other theories. In this context, Lombardo and Meier mention the 'garbage can' model and 'incrementalism' (Lombardo and Meier, 2009, p. 141). CFA does share certain notions with these two examples of theories; for instance, the selection of public policies is not assumed to be based on rational or intentional arguments in either of these theories (Lombardo and Meier, 2009, p. 141). Nevertheless, the 'garbage can' model and 'incrementalism', as well as other theories similar to them, do not take into account that policy problems can be seen as *"constructions"* – something that is not necessarily consciously created, and, furthermore, something that can hold a lot of different interpretations (Lombardo and Meier, 2009, p. 141). As an example, Lombardo and Meier explain, how a policy problem related to work-life balance can potentially be constructed as a problem to do with the labour market or as an inequality in the division of roles between the sexes (Lombardo and Meier, 2009, p. 141). On the other hand, the other kinds of theories, like the two mentioned above, might assume that the process of constructing a problem relies on negotiations, but they do not acknowledge the influence that individual frames have on each of the actors involved (Lombardo and Meier, 2009, p. 141). It is stated that the other theories might even present a *"discovery/response approach"* in the policy process: Once the problem is discovered, policymakers come up with solutions from an objective starting point (Lombardo and Meier, 2009, p. 141). This 'objectivity factor' is not acknowledged by CFA, which rather refers to the construction factor made up of both *"intentional and unintentional elements"* regardless of the potential influence of quantitative and qualitative data on policy problems (Lombardo and Meier, 2009, p. 141). Although this project does not focus on the policymaking process, which is often the case when applying CFA, there are certain elements of it which are relevant. As I have now accounted for, the idea about the individual actor's constructions of a problem in accordance with their frames is useful in my investigation of the negative reactions to the IC's feminist values, because I will need to account for different actors' frames and those frames' influence on how the problem of VAW and gender equality is perceived. This is done most effectively by introducing a critical element to my analysis, since it enables me to determine any underlying tensions or experiences affecting the reaction to the IC. Thus, I am not applying CFA in an effort to uncover the policymaking process of the national legislation related to VAW, gender equality, or the

implementation of the IC, nor am I looking at the frames that might have influenced the creation of the IC. More so, I am applying CFA due to its ability to see policy problems as (subjective) constructions, which is relevant in relation to the purpose of this project – to deconstruct the discourses, frames, or constructions in order to make sense of the motivation behind negative reactions to the IC. Adding to that, Lombardo and Meier points out that CFA refrains from the positivistic perspective which perceives the *"solutions as responses to objectively existing problems…"* (Lombardo and Meier, 2009, p. 141) Conversely, CFA's notion that a problem exists as a subjective construction allows me to discuss the problem of VAW and gender equality as abstract terms and dependent on different socio-cultural frames, since the understanding of these gender issues is not fixed or seen as universal in their constructions.

Ferree (2009) states that DOS is comparable to the framework found within scientific disciplines in certain respects. The two fields both have histories that privilege certain protocols or approaches to how the work is done, meaning that there are traditions which *"direct those who would be productive within them to follow certain practices rather than others."* (Ferree, 2009, p. 89) Accordingly, both fields revolve around institutionalised frameworks, whereby debates about specific issues recur regularly alongside rivalries between the most prominent actors (Ferree, 2009, p. 89). While scientists are guided by history and traditions embedded in disciplinary canons specific to their field, politicians in national governments and political actors working in transnational organisations are guided by *"authoritative texts such as constitutions, laws, judicial decisions, treaties and administrative regulations."* (Ferree, 2009, p. 89) To that end, the IC, which is such an authoritative text, becomes part of the international political framework shaping behavior, debates, and decisions about VAW and women's rights. On top of that, the IC also creates relationships by connecting social actors, as mentioned above, through their common perception of social order in relation to the values communicated through the IC. In light of this definition of frameworks and the IC as part of its dynamic concept, it becomes obvious that texts such as the IC cannot *"speak for themselves"* despite its authoritative function (Ferree, 2009, p. 89). Rather it offers a discursive structure which facilitates political actors with opportunities to present certain connections as inevitable and, at the same time, present others as *"conspicuously uncertain and so especially inviting for debate."* (Ferree, 2009, p. 89) These dynamic and open-ended facilities of political frameworks are called *discursive opportunity structures* (Ferree, 2009, p. 89). By this understanding of DOS, in my analysis, the IC represents *a* discursive opportunity to discuss gender equality and DV, but it does not make up *the entire* DOS within the discussion of gender equality

and DV. Moreover, the IC is part of the negotiation within the framework and it contributes to it, making it a DOS in itself – but only a partial one; thus, the concept of DOS does not equal the text of the IC. Rather, the concept of DOS operates within the overall framework of gender equality, which the IC is then part of.

Logically, the concept of DOS presents variations of convenience to different actors, meaning that certain frameworks and their associated discourses present restrictions to some social actors while supporting the purpose of other groups. As CFA stresses,

> *"... the authoritative text in any particular context have themselves been created by 'fixing' their meaning in a network of strong connections with other concepts, a process that always takes political work to accomplish and, once achieved, shapes future political work. A discursive opportunity structure is thus open, dynamic and imbued with power, not just something that exists passively as text 'on paper'."* (Ferree, 2009, p. 89)

Accordingly, the IC should be viewed neither as a passive text nor as a settled policy. The IC is an ongoing process despite the fact that it has already been adopted and opened for signatures; since it contributes to shaping *future political work*, it remains open and dynamic, as stated above, given its function as a DOS within a larger DOS framework.

Furthermore, discursive opportunity structures can be identified as *"a set of authoritative texts"*, for instance laws (Ferree, 2009, p. 89). What is central to the system of laws is that it, *"by its very nature, (...) is a system of dispute; if there were no opposing interests, there would be no need for treaties, regulations or decisions."* (Ferree, 2009, p. 89) By this line of argumentation, an analysis of the discursive opportunity structures surrounding the discursive struggles concerning the IC, which is part of this system of laws, then have dependent variables. The dependent variables are reflected in a, *"historically constructed and path-dependent"* (Ferree, 2009, p. 90), policy framework related to gender (in)equality in which the current struggles, i.e. the discursive opportunities, inherently exist; this variable, then, is what I aim to account for by applying my first research question[2].

When discussing frames, Ferree (2009) points out that the idea of a 'master frame' should not be included. In essence, frames are relational and fluid, meaning that they can intertwine and intersect (Ferree, 2009, p. 90). This means that a master frame by definition would inhibit the fluidity of frames. For instance, a rights discourse can be seen as a framework whereby 'rights' is the central

---

[2] See p. 33

concept, meaning that it is defined by its link with other elements within its *"web of meaning"* (Ferree, 2009, pp. 90-91). Accordingly, it is important to make the distinction between a rights discourse and a rights master frame. The latter presupposes that rights is the single most important element, which carries a single fixed definition; *"it would then connect hierarchically to a range of abstract and interchangeable elements such as 'equality', 'difference' or 'protection'"*, turning these elements into *"subordinate concepts"* comprising of single fixed definitions independent of their *"local framework"*, i.e. disregarding the meaning that they might carry with them from the discourse that they are typically employed (Ferree, 2009, p. 91).

In the same beat as she characterises the dynamic qualities of frames, Ferree (2009) critiques approaches that put emphasis on *"generating long lists of diverse 'frames' and of 'axes of inequality'"*, which has been applied in studies of frames before (p. 91). Instead, she refers to McCall's (2005) more appropriate approach to framework studies, namely one focusing on *'configurations'* (Ferree, 2009, p. 91). This approach attends to *"patterns"* as well as *"interactions among elements that have paradoxical and conflicting meanings depending on the specific context as a whole."* (Ferree, 2009, p. 91) She elaborates by saying that it is an *"empirical matter in any given context"* to decipher which concepts are relevant in regard to the *"configuration of inequalities in discourse and in practice by people in many different social positions…"* (Ferree, 2009, p. 91) Thus, this approach becomes relevant to my analysis, since I am looking into the concepts such as 'gender equality' and 'women's rights' in different settings and on different terms.

Thus, 'rights' can neither be categorised as a master frame with a fixed or real meaning, nor can it be used correctly or known completely. For instance, the argument that *'women's rights are human rights'*, which has been used extensively by various contemporary feminist organisations, stretches the concept of *'human'* as well as *'rights'*, giving both concepts entirely new meanings (Ferree, 2009, p. 92). Thereby, the argument does not simply allow the concepts to keep their existing meanings and apply them to a new group – i.e., women (Ferree, 2009, p. 92).

Additionally, Ferree works with two different concepts: 'resonant' frames and 'radical' frames, which help to determine the direction of frames covering gender equality and gender. More specifically, these concepts are often found in political systems and their discursive structures, where they are defined through *"relationships to other ideas, actors and actions…"* (Ferree, 2009, p. 92) Some of the actors who discuss gender will do it within frames that *"embrace many of these existing connections"*, which would be categorised as 'resonant framing' (Ferree, 2009, p. 92).

Others *"aim to transform the framework in which the idea of gender equality is embedded"*, which would be categorised as 'radical framing' (Ferree, 2009, p. 92).

2.2 FIXING, STRETCHING, SHRINKING, AND BENDING 'GENDER EQUALITY'

The concept of 'gender equality' has been contested for several decades, and both scholars and political actors have sought to capture the multiple meanings of it and prioritise one over the other (Lombardo et al., 2009, p. 1). Gender equality combines two concepts: 'gender' and 'equality'. Both these concepts have acquired meanings of which Lombardo et al. mention *"division of labour, sexual difference, reproductive relations"* in relation to 'gender' and *"class"* and *"race/ethnicity"* in relation to 'equality' (Lombardo et al., 2009, p. 2). Thus, *"gender equality is a concept that is part of the multidimensional reality of equality…"* (Lombardo et al., 2009, p. 2) As a result, gender equality is applied in various contexts and framed differently depending on the context (Lombardo et al., 2009, p. 2). Conclusively, my references to gender equality throughout this project are not attached to one single interpretation of the terms. Rather I take into account that there are certain reservations embedded in the dynamic nature of the concept as a discursive construction.

Lombardo et al.'s concepts of 'fixing' (*"in the sense of freezing it temporarily"*), 'stretching', 'shrinking', and 'bending' are part of the process shaping gender equality (Lombardo et al., 2009, p. 3). These processes can open up for opportunities to change the concept of gender equality – both in positive and negative directions (Lombardo et al., 2009, p. 3). In relation to these four concepts, Lombardo and Meier's definition of CFA, mentioned in chapter 2.1, becomes particularly relevant; keeping in mind that one of the arguments of CFA is that policy problems are *"constructions"*, unlike other political discourse theories (Lombardo and Meier, 2009, p. 141). Thus, it only makes sense to discuss and apply these four concepts in an analysis because I am applying CFA, since they function as the tools used to actually *construct* the policy problem. Adding to that, Ferree (2009) points out the basic principles of frames: they are relational and fluid (p. 90), which is another warrant for the relevance of the concepts of fixing, stretching, shrinking, and bending in this project.

   The first concept of 'fixing' occurs frequently and refers to the outcome of a discursive struggle (Lombardo et al., 2009, p. 3). One example, given by Lombardo et al., is the formal recognition of gender equality found in legislation, which came about because feminists' succeeded in stretching already existing frames of democracy and citizenship (Lombardo et al., 2009, p. 3). This effort then

caused the overall political discursive opportunity structure to shift which facilitated their success (Lombardo et al., 2009, p. 3). There is however a downside to fixing gender equality; it might lose its recognition as a *"contested goal"* because it becomes *"fixed to one particular understanding."* (Lombardo et al., 2009, p. 3)

The second concept of 'stretching' seeks to broaden the concept of gender equality and develop the initial understanding of it by expanding it, widening its meaning (Lombardo et al., 2009, p. 5). However, stretching often ends up diluting or blurring gender equality's initial meaning (Lombardo et al., 2009, p. 5). Lombardo et al. also make the point that stretching is facilitated by the fact that gender equality comprises of two *"independent – but interrelated concepts"*: 'gender' and 'equality' (Lombardo et al., 2009, p. 5).

Opposite to 'stretching', the third concept, 'shrinking', works to reduce the meaning of something so that it becomes confined to a specific policy area or a particular interpretation of a problem (Lombardo et al., 2009, p. 4); e.g., when gender equality is reduced to equal opportunities in the labour market. Referring to Bacchi (1999), Lombardo and Meier explain that contemporary gender policies most often assume that gender equality is reached once equal access is provided for both sexes, meaning that the narrow area of employment is targeted while the overall focus on structural power relations between men and women is lost (Lombardo et al., 2009, p. 4). As with 'fixing', the discursive action of shrinking tends to simplify social problems and the solutions they require (Lombardo et al., 2009, p. 4). Moreover, shrinking is likely to lack reflexivity, which causes a partial representation of reality (Lombardo et al., 2009, p. 5).

The fourth and last concept that shapes gender equality discourses is 'bending', which mainly differs from the other three concepts by its relation to the goal of gender equality (Lombardo et al., 2009, p. 5). While the three other processes keep gender equality as a goal, bending diverge from it (Lombardo et al., 2009, p. 5). Though fixing and shrinking might cause fragmentation, both processes keep gender equality central in the debate (Lombardo et al., 2009, p. 5). Likewise, the process of stretching might turn it into one of several goals; however, gender equality continuously holds a central role (Lombardo et al., 2009, p. 5). In contrast, the process of bending shapes the meaning in a way that sacrifices the goal of gender equality: *"Bending occurs when the concept of gender equality is adjusted to make it fit some other goal than the achievement of gender equality itself…"* (Lombardo et al., 2009, p. 5) Furthermore, Lombardo et al. explain that in cases where the *"concept of equality within the family"* is bent in order to make it fit with *"the dominant labour market agenda"*, it has caused a 'degendering' of the issue, which then blocks goals of gender

equality such as challenging inequalities within families regarding gender roles (Lombardo et al., 2009, p. 6). This aspect of the bending process, i.e. 'degendering' thus provide a derailing effect.

As an additional aspect to the discursive processes accounted for above, role attribution should also be introduced. Usually there are certain dynamics that appear when it comes to role attribution between actors (Lombardo and Meier, 2009, p. 147). Lombardo and Meier examined the cases of Spain and the Netherlands and found that their policy texts on DV, and also gender underrepresentation of women in politics, treated women as *"the group that holds the problems of (...) violence."* (Lombardo and Meier, 2009, pp. 147-148) Conversely, men's role in DV policies were either non-existing in relation to the *"definition of the problem"* or, alternatively, they were *"invoked in the most gender-neutral way..."* (Lombardo and Meier, 2009, p. 148) Thus, women were called upon to act, while men were never *"the target group of the actions..."* – it is expected that women themselves take action when exposed to violence (Lombardo and Meier, 2009, p. 148). Although these findings are related to policy texts that already exist, similar discourses might occur in the debates chosen as data for this project, which rather depicts some of the discussions around and arguments directed at potential policies on DV. Lombardo and Meier's data, i.e. the Spanish and Dutch policy documents, showed that there were *"no reference to 'who' caused the problem; either nobody appears as responsible or institutions such as traditions or society carry the blame"* (Lombardo and Meier, 2009, p. 148). What is more, the Dutch policies on family life and DV tended to *"ethnicize"* the problem by stating that the issue occurs predominantly among ethnic minorities (Lombardo and Meier, 2009, p. 148). Another interesting finding in their study in regard to the role attribution is the *"'male' absence"*, which was proven to be prevalent in the representations of the issue of DV, whereas women were often portrayed as victims (Lombardo and Meier, 2009, p. 148). It is relevant to take these examples of role attributions in the VAW-policy discourse into account throughout my analysis, since they demonstrate the importance of attending to the framing of the problem in regard to actors. Moreover, it will help to clarify which social groups are targeted and how that particular discourse and its inherent stereotypes reveal underlying gender biases in a given frame. This is also relevant in relation to DOS, since discursive opportunities might appear in certain frames' representation of gender or role attribution (Lombardo and Meier, 2009, p. 148). For instance:

> *"The shrinking of the problem of domestic violence to an issue that only affects ethnic minorities, as in the previous example from the Dutch case, can have several consequences. It*

can block the adoption of policy measures for fighting gender inequality on the part of native
Dutch women, because it assumes that Dutch women no longer face problems in this area."
(Lombardo and Meier, 2009, p. 149)

Lombardo and Meier argue that this strategy can also be interpreted as 'bending' – it no longer focuses on gender equality in its own right but, more so, on the problems of specific ethnic or religious groups and how well they are adapting to Dutch norms (Lombardo and Meier, 2009, p. 149).

2.3 ANTI-GENDER DISCOURSES AND 'GENDER IDEOLOGY'

Krizsán and Popa (2018) divide anti-gender discourses into explicit and more implicit ones. Some discourses openly reject ideas about DV as a gendered concept, whereas others challenge arguments of gender in a more subtle manner by questioning its fundamental logic (Krizsán & Popa, 2018, p. 100). According to Krizsán and Popa, both types of framing – explicit and implicit – can relate to either one of two lines of arguments contesting DV's relation to gender inequality: *"privacy or gender hierarchies."* (2018, p. 100) Hereby, there are some anti-gender actors, who rely on discussions of privacy, moreover, an intrution of the private family life (Krizsán & Popa, 2018, p. 100). Some anti-gender groups even compare the crimes happening in the public sphere with the ones committed in the home, saying that offenses occurring at home are insignificant in comparison to the ones occurring in the public space (Krizsán & Popa, 2018, p. 100). Hereby, DV is trivialised and framed as an issue which is a waste of time and takes away from supposedly more pressing issues in terms of policy making. This could be viewed as a discursive opportunity where the concept of shrinking has been applied. The other contesting discussion revolves around the rejection of gender as a concept in its own right (i.e., as a construction existing independently from biological sexes) as well as gender as a concept that is part of the DV issue (Krizsán & Popa, 2018, pp. 100-101). Thus, 'gender' is framed negatively as a feminist project, and therefore the idea that DV essentially is rooted in structural gender inequality is framed as an illogical explanation (Krizsán & Popa, 2018, p. 100). Hence, proposals to introduce gender equality to the family unit is also rejected (Krizsán & Popa, 2018, p. 100). According to Krizsán and Popa, these kinds of arguments have flourished in Europe at an increasing rate after the adoption of the IC in 2011 (2018, p. 101).

   In addition to the gender equality confrontations accounted for above, Krizsán and Popa also mention another method of opposition: *"child-protection frames"* or *"family-protection frames"* (2018, p. 101). These framing methods raise concerns about the safety of children living in homes

where DV occurs. When anti-gender actors announce their agenda as a child-protection agenda, their strategy is to present the child as the primary victim of DV (Krizsán & Popa, 2018, p. 101). Hereby, providing mothers with protection becomes an instrument seeking to protect the children and thereby not a means to accommodate the woman's own rights. Accordingly, it follows that women without children become invisible in this child-protection frame (Krizsán & Popa, 2018, p. 101). This strategy is a clear example of bending, whereby focus on the main issue is led astray. Radicalising the child-protection frames even more, some of the prominent "gender ideology" theorists have introduced what seems to be conspiracy theories. For instance, the acts of abortion and contraception are parts of the "*mystery of evil*" which opposes the "*culture of life*" (Paternotte and Kuhar, 2017, p. 6). Hence the anti-gender movement's discourse clearly seeks to promote its cause as virtuous, while presenting the idea of gender as a destructive force. By this framing, it becomes clear, how the anti-gender movement might succeed in recruiting new followers, especially as they dig into emotions such as fear: the gender project "*is said to be particularly threatening to children, who would be indoctrinated from very early age in school, often without their parents' awareness.*" (Paternotte and Kuhar, 2017, p. 6) Additionally it is put in connection to a "*hyper-sexualization of children*" and pedophilia (Paternotte and Kuhar, 2017, p. 6).

The child-protection framing strategy draw parallels to the *family-protection frames*, which puts the family first at any cost, "*reasoning that even a violent family is better than no family.*" (Krizsán & Popa, 2018, p. 101) Though this seems unsustainable and undesirable from a feminist or progressive perpsective, the people who agree with the notions of the family-protection frame will argue that it is more feasible to preserve the family unit as opposed to identifying perpetrator and victim, i.e. diagnosing unequal power relations within the family, and acknowledging the right of the (individual) woman to be protected (Krizsán & Popa, 2018, p. 101). At the same time, they raise doubt about interventions into the family, which is also an attempt to debunk the "*individuals-rights logic of gender-equality frames*" in relation to DV (Krizsán & Popa, 2018, p. 101). In the same context, "gender ideology" – which references gender equality and LGBTI rights activism – is presented as a threat towards Europe by the anti-gender movements. The "gender ideology" theorists' conspiracy-like theories on contraception and abortion, mentioned above, are also included in the frame of "gender ideology". From their point of view, the threat of gender to society is the prospect of "*an anthropological revolution because it negates sexual differences and gender complementarity*" (Paternotte and Kuhar, 2017, p. 5); i.e., it will ultimately eliminate the "*anthropological basis of the family*" (Pope Francis 2016 quoted in Paternotte and Kuhar, 2017, p.

5). Thus, the idea of gender as a threat to the traditional family constellation is shared by the Pope, who warns people about it. The anti-gender campaigns also produce alternative knowledge, which seeks to deflate post-structural research within social science and humanities in particular, and present arguments relying on *"unquestionable findings of natural sciences"* such as biology, medical, and psychology studies which emphasise differences between male and female sexes (Paternotte and Kuhar, 2017, p. 6).

Although the rise of European anti-gender movements did not blow up until the 2010s, the notion of "gender ideology" emerged in debates at the Vatican and to an *"elaboration of a counter-strategy after the 1994 UN conference on Population and Development in Cairo and the 1995 Beijing conference on women."* (Paternotte and Kuhar, 2017, p. 9) Throughout the anti-gender movement's expansion, the Catholic Church has played a significant role, voicing intellectuals' and activists' ideas, diffusing their reasonings, and enabled a greater platform for mobilising more support for the movements (Paternotte and Kuhar, 2017, p. 12). Nevertheless, Paternotte and Kuhar state that it is important to look beyond the Catholic Church and investigate other channels and *"hybradized"* strategies *"adopted in specific contexts…"* (2017, p. 12)

As stated by Paternotte and Kuhar, the support for the anti-gender movements' mobilisations in Europe might have been unexpected, however, it must also be seen in the light of the rise of right-wing populism.

> *"Although actors may not be aware of its religious origins, the discourse on "gender ideology" often resonates with their own ideas and criticisms of gender. (…) The nostalgia for a lost golden age, where everything was simpler and genders were what they looked like, may also nourish a quest for firmer foundations when everything is disappearing."* (Paternotte and Kuhar, 2017, p. 14)

Thus, "gender ideology" functions as symbolic glue, because it brings different actors with different agendas together (Paternotte and Kuhar, 2017, p. 14). Hereby there is typically an overlap between anti-gender activists and people who promote right-wing populist politics, especially in countries such as Austria and Germany (Paternotte and Kuhar, 2017, p. 14).

The groups of anti-gender advocates vary to some degree in terms of the supporters' motivation; commonalities are found in their animosity toward elites who they take to be corrupt. Also international elites, or powerful institutions, are blamed for imposing policies from above, including gender, on the European people. In the anti-elitist discourse, these institutions are often put into a

single collective term, namely 'Brussels', since this is thought to be the power centre in the European context (Paternotte and Kuhar, 2017, p. 14).

> *"... anti-gender and populist campaigns utilize similar discursive strategies, identified by Wodak (205, 4) as the necessary toolkit of right-wing populist rhetoric: victim-perpetrator reversal, scapegoating and the construction of conspiracy theories."* (Paternotte and Kuhar, 2017, p. 14)

Hereby, fear is instilled (whether or not it is real), and the scapegoats come to represent *"the dangerous Other, whose image is based on collective stereotypical imaginaries..."* (Paternotte and Kuhar, 2017, p. 14)

As Krizsán and Popa also point out, the level of influence of an anti-gender discourse should be estimated on the basis of the figure, group, or institution who applies it (2018, p. 103). This argumentation is also in line with my reflections on the data I have chosen to include. Accordingly, the given discourse's effect on DV policymaking will be dependent on the entry point or the power position that the anti-gender actor has in relation to blocking policy progress. In the case that these actors are able to block gendered policies, the literature on this subject refers to them as *"veto players"* (Krizsán & Popa, 2018, p. 103), which indicates their discourse's ability to reach beyond popular outbursts of dissatisfaction and into the sphere of political influence.

2.4 OPERATIONALISING CFA AND DOS

> *"Rather than lists of (...) frames, we can begin to develop an analytical model of framing as processes that actively connect concepts. These connective processes will systematically push some ways of thinking into the definitional background and foreground different concerns in specific cases while remaining comprehensible as comparable systems."* (Ferree, 2009, pp. 99-100)

I will operationalise the DOS and CFA theories according to the notion articulated in the quote above. Hereby, I will *"connect concepts"*, and identify the *"concerns"* that have been foregrounded. Thus when different concerns are foregrounded, the definition of women changes; for instance, women can be categorised as mothers, second-class citizens, or other labels, depending on the given gender framework. In connection with this notion, Lombardo et al. state that a *"concept lives in a semantic universe, and its potential meanings depend on the relation with other concepts present in that universe. There is room for shaping the meaning of a concept, but not*

beyond the existing universe that limits what is conceptually and politically possible." (2009, p. 12)
Thus, there are existing hegemonic discourses, which affect the borders that allow for movement and shaping of a given concept.

Accordingly, my use of DOS and CFA in my analysis relies on these understandings of frames as connected concepts and concepts' affiliation with a specific universe. Therefore I will be able to make sense of my data by looking for the gendered concepts and seeing how they fit into the universe of the political discourse. Moreover, I will be analysing what kind of (gendered) concepts are part of the gender equality debate and the debate on the IC in order to demonstrate how the frames might be used strategically to resist the IC. Though I say strategically, my analysis will adhere to Lombardo and Meier's idea, accounted for in chapter 2.1, about the *"socio-cultural bias"* that lies within a subject's partially intentional and partially *"unintentional representation of reality"* (2009, p. 140). Although the extent of the aspect of intentionality is difficult to measure, I will be able to hold it up against my accounts of the national frameworks whereby political discussions on gender equality and DV unfold, which will help me identify conditions and notions within the framework of each case that might facilitate a socio-cultural bias. In a more concrete sense, this will enable me to deconstruct potential *"unintentional representation of reality"* and explain underlying intentions of resistance towards the IC. For instance, Lombardo and Meier's concept of role attribution, whereby 'male' absence occurred in the policy texts that they analysed, demonstrated that underlying notions about DV as an exclusive women's issue were prevalent. From this example, it can be argued that the intention might have to do with reluctance to assign men with a responsibility to support the fight against VAW – for whatever reason that makes sense in relation to the conditions within the framework, e.g. issues of breaking up traditional, discriminating practices or another reason might be ignorance of men's role in VAW. This example illustrates the analytical approach to CFA and DOS that I intend to apply in my analysis too.

To that end, I will be looking for occurrences of fixing, stretching, shrinking, and bending; thereby, I can identify concrete discursive strategies in the discourses of my data, i.e. whether or not the actors utilise any of these strategies in their discussions of gender equality and the IC. A concrete example of 'shrinking' or 'bending', for instance, is the 'ethnicising' of issues in policy discussions, which is a relevant discourse to look for in my data too.

Lastly, I will be able to use the theoretical input on anti-gender discourse and 'gender ideology' from chapter 2.3 and check whether or not it applies in discussions of the IC as well. Specifically, Krizsán and Popa's concepts of explicit vs. implicit framing as well as their idea that the anti-

gender discourses related to DV rely on either the argument about invasion of families' privacy or the argument about gender hierarchies (2018, p. 100). There are also other specific framings to look for, such as the child- and family protection frames, whereby the idea that DV is rooted in structural gender inequalities is portrayed as illogical and there is no distinguishing between 'sex' and 'gender' (Krizsán and Popa, 2018, p. 100). The arguments that gender, or "gender ideology", should be considered a threat to society appears alongside the rise of right-wing populism. These political streams is where scapegoats are created in the form of elites (such as 'Brussels'), transgendered people, and 'Others' based on the *"collective stereotypical imaginaries"* (Paternotte and Kuhar, 2017, p. 14). This is another anti-gender discourse to look for in the data.

The choice to apply CFA, DOS, and "gender ideology" in my analytical approach is tied to their complex interrelatedness. As mentioned before, CFA and DOS share some of the same concepts, and theorists use terms such as discursive opportunities and frames in their discussion of both concepts. The third theory on anti-gender discourses or "gender ideology" discourse is equally important and connected to the other two approaches. The cohesion between all three theories lies, first of all, in their critical approach, which is ideal in an investigation like mine which departs from a feminist perspective. Second of all, the three theories are connected through their emphasis on socio-cultural biases and the importance of discursive tools such as role attribution. Third of all, these theories reach beyond one (master) frame and allow for an investigation of the fluidity between frames, which is key in an investigation of (gender) equality.

To break down my main question, my analysis will be guided by three research questions:

1. Which factors and which actors characterise the anti-gender frames of the current political debates on gender (in)equality legislation in 1) Denmark, 2) Hungary, and 3) Germany?
2. How do the frames in each of the three cases facilitate discursive opportunities for political actors in their discussion of the IC?
3. Are there any similarities/differences between the variations of reactions to the IC in 1) Denmark, 2) Hungary, and 3) Germany, which indicate a connection to the general, recent anti-gender attitude in Europe?

The first research question will be answered in the first half of my case analyses (chapters 3.1.1, 3.2.1, and 3.3.1). The second question is answered in the second part of the case analyses – the

analyses of the data (chapters 3.1.2, 3.2.2, and 3.2.2). The third question is taken up in the discussion following the analysis chapter, which will pursue a comparison between the three cases. Lastly a conclusion will be provided.

3. ANALYSIS

3.1 DENMARK

3.1.1 ANTI-GENDER FRAMES: NATIONAL FACTORS AND ACTORS

National History – Gender Equality

To provide a thorough account of the Danish gender equality framework it is important to include a historical perspective. Following the ideological conflicts in the 1950ies and 1960ies regarding women's place in the domestic sphere versus the public sphere, the dual breadwinner ideal became the norm as opposed to the male breadwinner ideal (Borchorst and Dahlerup, 2003a, pp. 10-11). This change resulted in an expansion of the welfare state, which to the this day means that the state functions as a substitute caregiver, ensuring that women became free to join the labour market especially in cases of divorce, which has not always been the case (Borchorst and Dahlerup, 2003a, pp. 10-11). In 1966, the birth control pill was made available and abortion was legalised in 1973 (Borchorst and Dahlerup, 2003a, p. 200). Adding to that, DK was also a frontrunner on the legalisation of same-sex marriage as well as single women's right to have children (Dahlerup, 2018, p. 192). All these progressive initiatives depict DK's liberal stance; Dahlerup (2018) even labels DK *"the liberatarian of the North"* (p. 192). This stance also means that gender equality instruments like quotas have never been popular among any of the political parties on either side of the political spectrum (Dahlerup, 2018, p. 192). So even though DK is labeled as a progressive gender equality state, emphasis is kept on a liberal ideology, meaning that resistance to gender equality might occur where the initiatives do not accommodate DK's liberal outlook – for instance, the gender quota initiative.

Another controversy has occurred in political debates about the state's interference in family life, specifically in relation to child care. Especially the liberal and the conservative parties have been skeptical about the idea of the state's interference in care work within families, i.e. legislation on maternity leave versus paternity leave (Borchorst and Dahlerup, 2003b, p. 197). In opposition to this stance, the left-wing parties claim that the state is responsible for stimulating men's care giver

responsibilities (Borchorst and Dahlerup, 2003b, p. 197). Furthermore, Borchorst and Dahlerup (2003b) state that the Danish debates on political decision making regarding maternity leave discuss the issue from the point of view that women have a right and a duty to care for their children and, what is more, there are no concerns associated with the discussion of this matter, whereas discussions on regulating men's care giver duties are quickly turned into a matter of controversy (Borchorst and Dahlerup, 2003b, p. 198). Thus, implicit assumptions in regard to stereotypical gender roles in child care persist.

Borchorst and Dahlerup (2003b) also mention the source of motivation to legislate on gender equality. According to them, the other Nordic countries seem to be driven by national actors, whereas DK seems to be influenced less by national actors and more by international institutions, such as the CoE and, in particular, the EU, which is bound upon the political incentive to 'act now' more so than a clear set of goals (Borchorst and Dahlerup, 2003b, p. 187).

As mentioned in the chapter 1.1 on case selection, gender equality is part of DK's national identity and image. In fact, gender equality has even become part of the official *"Denmark Canon"* following an internet referendum organised by the Ministry of Culture (Dahlerup, 2018, p. 192). This signifies that gender equality is considered one of the ten most important values alongside other values such as the Danish language and tolerance (Dahlerup, 2018, p. 192).

Gender Equality in a National Identity Framework

In Agustín and Sata's study on *Gendered Identity Constructions in Political* Discourse, they interviewed both Danish and Hungarian politicians asking questions on their understanding of Europeaness and integration. They learned that Danish politicians expect that gender equality, and a will to support it, is a given value to hold for the EU Member States. Some of the politicians from Venstre (centre-right-wing party) even feel that the Danish effort is superior or *"more advanced"* than the EU's (Agustín and Sata, 2013, p. 64). Thus, there is a general confidence and assertiveness in relation to the Danish gender equality standard in a context of comparing the Danish nation to other EU member states. In relation to integration of ethno-national minorities in the Danish society, gender equality is also seen as key; first and foremost in the form of integration into the labour market, but then also in the form of utilising the option of child care services (Agustín and Sata, 2013, p. 63). One last point that I take from Agustín and Sata's study on the Danish case is that there seems to be relative consensus between the two biggest mainstream parties (Socialdemokratiet and Venstre); and so, despite the fact that they belong to *"two opposite*

ideological wings of the political spectrum", both parties support the idea that the Danish national identity is strongly affiliated with gender equality in general (Agustín and Sata, 2013, p. 65)

When digging a bit deeper, nevertheless, the general support for gender equality seems to be sporadic in the sense that not all parties support it to an equal extent. What is more, scholars (Borchorst and Dahlerup, 2003a; Dahlerup 2018) have pointed out that the Danish effort in the gender equality area of politics has stagnated within the recent couple of decades. Starting with the latter issue of stagnation, the Swedes and the other Nordic countries are more open to the discussion of gender equality – a somewhat controversial discussion in the sense that it displays and criticises one's own society's gender relations and hierarchical structures (Borchorst and Dahlerup, 2003b, p. 194). Borchorst and Dahlerup (2003b) state that it is clear, how the desire to avoid an open conflict about gender equality – a sensitive subject due to the inescapable confrontation with the inherent power structures of gender roles and relations – has contributed to the lack of a clear connection between the goal and the measures to reach it (p. 194). As mentioned in my chapter on case selection, gender equality has been higher up on the priority list of the remaining Nordic countries' politicians, who are also more willing to engage in conflicts about the subject (Borchorst and Dahlerup, 2003b, p. 195). In the light of the Danish politicians' reluctance to discuss gender equality thoroughly, the issue is quickly turned into a case of tokenism[3], which prevents any strategical planning from happening. Borchorst and Dahlerup (2003b) explain this further by saying that gender equality has never been considered a field of knowledge as much as a field of opinion, meaning that decisions on political initiatives on the subject has neither relied on statistics nor research or evaluations of previous experience (p. 188). Legislation on sexual assault against women and DV has therefore also been limited (Borchorst and Dahlerup, 2003b, p. 202).

'Closed Case' Discourse

Turning to the aforementioned issue of different levels of support among the Danish parties, one explanation why the stagnation occurred could be the idea among some of the parties that gender equality is a 'closed case'. In her study from 2018, Dahlerup identified a new or, as she says, *"modern"* discourse on gender equality in Danish politics as well as in public debates: The 'closed case' discourse (Dahlerup, 2018, p. 206). This discourse contains arguments stating that gender equality has either been achieved, i.e. no new reforms on gender equality are needed, or that it has even *"gone too far"* (Dahlerup, 2018, p. 206). Although the survey carried out during the 2011-

---

[3] Cases in which politicians support a policy, while they expect – they might even hope – that the policy will not lead to significant changes (Borchorst and Dahlerup, 2003b, p. 187).

2015 parliament from her study showed that the majority of Danish MPs that responded at that time believed that gender equality had yet to be realised in DK, while one third endorsed the 'closed case' discourse (Dahlerup, 2018, pp. 206-207). It is clear that there is a significant division between left and right wing politicians in regard to the 'closed case' position: right-wing parties are the predominant supporters, whereas the left-wing parties tend to agree that gender equality is far from being a closed case (Dahlerup, 2018, p. 197). The controversial argument that that gender equality has gone too far was given a more prominent role in the public debate by university professor Hans Bonde's book (2013), which argued that there has been shift from *"feminism to favouritism"*, meaning that *"men today are the disfavoured"* (Dahlerup, 2018, p. 191). Despite its recent reuptake, this point of view has met immediate criticism from the feminist community (Dahlerup, 2018, p. 191). Moreover, the 'gone too far' discourse remains a minority position both in public as well as in parliament where only 5 % of MPs agreed with it (Dahlerup, 2018, p. 196). It should be noted that Bonde's critical academic perspective is different from the critical political perspective that I have focused on in this project; thus, his particular discourse might not be represented in the political discourse on gender equality. Despite its scarce support, the occurrence of discourses similar to Bonde's has been viewed as an indicator of anti-feminism and even a sign of backlash against gender equality (Dahlerup, 2018, p. 196). Nevertheless, I would argue that the proportionally small size of this issue, i.e. the gone too far discourse, goes to show that the 'backlash' against gender equality in DK is quite modest and the resistance that does take place is most often implicit and subtle, putting in into Krizsán and Popa's (2018) two categories of anti-gender discourses.

Neo-Liberal Framing Danish Politics

Sticking to Krizsán and Popa's (2018) division of anti-gender discourses, their reference to the contesting DV argument of private invasion of the family life fits some of the Danish right-wing MPs' statements well. To that end, Meret and Siim's study on right-wing populist parties in DK points to discrepancies between DPP's (Danish People's Party) *"openly liberal individualistic approach to gender equality issues and emphasis on non-state interference"* (2013, p. 87). Although some traditional values regarding gender roles and family life are promoted by DPP (Meret and Siim, 2013, p. 87), it does not seem to be the same radical anti-gender discourse as one will encounter in other parts of Europe. Although DPP might articulate a preference for heterosexual marriage and the sacredness of *"the traditional nuclear family"*, they do not exclude

the idea of alternative family constellations (Meret and Siim, 2013, p. 87). DPP is interesting to discuss in the context of this project because, as Borchorst and Dahlerup (2003b) states, there are few actors in DK that will openly resist gender equality initiatives, however, DPP has been the exception to this rule at several occasions (p. 193), continuously voting against gender equality reforms (Dahlerup, 2018, p. 197). According to Dahlerup (2018), the current neo-liberal tendencies in Danish politics seem to have revived the justification of resistance towards gender equality, which has historically been applied by the right-wing: there is *"a limit to state intervention in the relations between the sexes…"* (pp. 204-205). Specifically, she is referring to Liberal Alliance (far right-wing party), which has declared that they *"will vote against all proposals, which focus on equality of result. ... All state regulations of gender relations ('al kønsregulering') should be abolished'"* (2017 Liberal Alliance party programme quoted in Dahlerup, 2018, pp. 204-205).

Online Hate Speech

In addition to the critical academic discourse, exemplified by Bonde's discourse, and the critical political discourse, it should also be mentioned that online hate speech has opened a new forum in which a radical and explicit anti-gender discourse is found. In 2016 Institut for Menneskerettigheder prepared a report on online hate speech in DK, where they investigated Danish news sources' (TV 2 and DR) Facebook posts. Their results showed that the highest numbers of hateful comments were found in the news posts regarding religion, migrants, or gender equality (Zuleta et al., 2017, p. 7). The report also showed that men were senders of the majority of the hateful comments (76 %) (Zuleta et al., 2017, p. 12). 15 % of the hateful comments were related to gender and 58 % of these targeted women (Zuleta et al., 2017, p. 75). Furthermore, the report states that most of the comments were placed at the lower end of an extremity scale (Zuleta et al., 2017, p. 12). Overall, the results and the assessments from this report indicates that even though there are many examples of radical and explicit anti-gender discourses on social media, it is not a prominent discourse.

Anti-Immigration Frame

Another aspect to the Danish, implicit way of resisting gender equality is right-wing politicians' view on gender inequality as a problem found among immigrant families rather than among native Danes. Just like Lombardo and Meier's (2009) study and Roggeband and Verloo's (2007) study, which showed that Dutch policy texts on DV and family life tended to *"ethnicize"* the problem of gender inequality and shift focus onto Muslim culture, the Danish political discourse has contained

similar language. When former Prime Minister Anders Fogh Rasmussen (liberal) held his opening speech to parliament in 2003, he spoke about *"'oppressing family patterns' among immigrants"* for the first time (Dahlerup, 2018 p. 191). This discourse is also taken on by DPP, who constantly make claims about the threat of immigrants in regard to many different matters, but also gender equality matters, and especially immigrants from Islamic countries are referenced (Siim & Meret 2013, p. 91) Through this discourse a division in society was created in accordance with the idea that 'we' have reached gender equality, whereas, 'they' have not; i.e. gender inequality is brought to DK and exists within ethnic minority groups and not in 'our society' amongst 'our own people', which resonates well with the believe that the Danish society has already reached gender equality. As mentioned in the Theories chapter, this is a case of scapegoating through the use of the discursive tool of bending, whereby politicians no longer focus on gender equality in its own right, but rather on specific minority groups – the scapegoats – and how well they are adapting to the national norms. This might pose a threat to the debate on and solution of the gender based violence among ethnic Danes.

3.1.2 DISCURSIVE OPPORTUNITIES IN DISCUSSIONS OF THE IC

National IC debate timeline: The proposal to have the Danish government sign and ratify the IC as soon as possible was submitted by Nikolaj Villumsen from Enhedslisten (far left-wing party) on April 16, 2013, and it was discussed on May 24, 2013. DK ended up signing the IC on October 11, 2014, and the convention entered into force on August 1, 2014 (CoE, 2019c). Although DK ratified the IC in 2014, GREVIO is continuously monitoring the country's efforts and compliance with the convention. Accordingly, GREVIO published their first report on DK on November 24, 2017, which pointed to concerns with the Danish child custody procedure (Council of Europe Communications, 2017). This report led to a new political debate in 2018 on DK's efforts of implementing the IC. As the Minister of Children and Social Affairs, Mai Mercado from Konservative (a right-wing party) was considered the responsible person and, therefore, compelled to react to the citicism. Eventually she did in a response letter published on October 4, 2018.

Implementation Process Frame

When reading through the transcript of the parliamentary debate (May 24, 2013), a pattern seems to emerge whereby two different frames appear through the politicians' discourses. The first one is related to the process of accepting and implementing the convention, and the second frame relates

to the content of the IC, specifically its definition of gender.

Starting off the debate, Morten Bødskov (Social Democrat), Minister of Justice at the time, clarified why the government would not agree to speeding up the signing process. His speech characterises the general reluctance among the majority of the MPs to support the proposal, which they explain by emphasising the importance of awaiting results of an investigation showing the impact of the convention's ratification on Danish legislation. At the time of this debate, the Ministry of Justice was still in the process of investigating what implications a ratification would have on Danish legislation; thus, Bødskov insisted that it would not be feasible to sign the IC until all the information from the investigation was laid out (ft.dk, May 24, 2013 at 12:09). His argument matches the other MPs' speeches in certain aspects: they agree on the importance of legislation on bringing down DV and VAW; however, their support for the IC relies on the results of the Ministry of Justice's investigation. Accordingly, this frame of the process of signing and ratifying the IC is characterised by the liberal framework that permeates all political areas where the question of top-down governing emerges in the Danish context. Thus, discussions like this one on the IC offer discursive opportunities for some parties to establish their mandate for sovereignty. This is also the case with DPP's comment in this debate. DPP did not support the proposal either, and their representative, Pia Adelsteen, explains the party's stance further:

> "From DPP's point of view, it is not conventions that will change the everyday lives of the people suffering from violence. (...) It may well be that a signature sends a signal to others about our values, but if the convention, at the same time, imposes changes in other fundamental areas (...), and if it leads to great expenses, which might not be targeted directly at fighting violence against women or children or men, or wherever we are headed, but at other sorts of things, then it seems futile to me." (ft.dk, May 24, 2013 at 12:30)[4]

It is obvious how Adelsteen's speech conveys DPP's hostile attitude towards the institutional top-down process whereby policies are imposed on member states. Thus, the discussion of whether or not to sign the IC without reservations offers a discursive opportunity to incorporate the frame of rejecting international institutions. Hereby, it becomes a discussion of rejecting international

---

[4] *"... fra Dansk Folkepartis side er det jo altså ikke konventioner, der i vores øjne ændrer hverdagen for de mennesker, der er udsat for vold.(...) Det kan godt være, at en underskrift på en konvention viser noget i forhold til omverdenen, viser noget om, hvilke værdier vi står for, men hvis konventionen så samtidig pålægger os at ændre nogle andre ting grundlæggende (...), og hvis det at underskrive og ratificere sådan en konvention også gør, at vi får en meget stor udgift, som måske ikke går til at bekæmpe vold mod kvinder eller børn eller mænd, eller hvor vi nu er på vej hen, men til alt muligt andet, så er det altså i mine øjne fuldstændig omsonst."* (ft.dk, May 24, 2013 at 12:30)

institutions rather than rejecting the objective of the gender equality initiative.

Lone Loklindt from Radikale Venstre (centrally located on the political spectrum) makes an interesting point, which might help explain some of the right-wing parties' reservations regarding some of the aspects that would follow a ratification of the IC. She states that there is a clear, underlying message within this discussion: VAW is not a private matter and the IC qualifies the issue *"as a violation of human rights and discrimination."* (ft.dk, May 24, 2013 at 12:39)[5] She adds that the convention encourages member states to strive for *"greater gender equality, because violence against women is deeply rooted in inequalities between men and women in society…"* (ft.dk, May 24, 2013 at 12:39)[6]

Adelsteen foregrounds concepts such as financial expenses of implementing the IC, which she warns might end up compromising the budget intended for attending directly to people suffering from violence. Conversely, when Loklindt mentions human rights and VAW as a gendered structural issue, she foregrounds concepts from a more globally oriented framework. The global framework in her discourse puts the IC into a bigger perspective than Adelsteen does, because Loklindt connects the concept of VAW with universally shared responsibilities concerning human rights and discrimination. The comparison between the two MPs' discourses in this case shows that the discursive opportunity presented in the debate on signing the IC right away – which also becomes a discussion of the acceptance of the IC in general – is used in various ways by incorporating frames that facilitate discourses with diverse objectives. So even though Radikale Venstre also rejects the proposal, their attitude towards the convention is positive unlike DPP's:

> *"Internationally, Denmark has a high profile regarding gender equality work (…). Therefore, a Danish signature and ratification would support our international effort, whereas declining to sign it would appear as a paradox."* (ft.dk, May 24, 2013 at 12:39)[7]

---

[5] *"Det tydelige og underliggende budskab er, at vold mod kvinder og vold i hjemmet ikke er et privat anliggende. Det er et overgreb, som konventionen kvalificerer som brud på menneskerettighederne og som diskrimination."* (ft.dk, May 24, 2013 at 12:39)

[6] *"Konventionen er en opfordring til større lighed mellem kønnene, for vold mod kvinder er dybt rodfæstet i uligheden mellem mænd og kvinder i samfundet…"* (ft.dk, May 24, 2013 at 12:39)

[7] *"På internationalt plan har Danmark en høj profil i forhold til at kæmpe for kvinders ligestilling (…). Derfor vil en dansk undertegnelse af ratificeringen også støtte vores arbejde ude i verden frem for den manglende underskrivelse, der fremstår som et paradoks."* (ft.dk, May 24, 2013 at 12:39)

Content Frame

Turning to the second frame that appears in the debate, which focuses on the content of the IC, MP Fatma Øktem from Venstre states that the party disagrees with the convention's definition of gender:

> *"Venstre does not agree with the notion that gender is a social construction. We believe that gender is, first and foremost, biological, which is why we find it odd to state in a convention that gender is solely a social construction."* (ft.dk, May 24, 2013 at 12:20)[8]

This comment exemplifies a kind of anti-gender discourse or perhaps resistance to the feminist notion of gender as more than a biological marker. Venstre did not support the proposal. Neither did Liberal Alliance (LA). According to their representative, Mette Bock, LA does not think it is right to have the state make regulations deciding on how people live their lives; however, in the case of DV, the party does find state interference necessary:

> *"... Liberal Alliance would like to see a timely and much more consistent effort on the authorities' behalf in cases of domestic violence."* (ft.dk, May 24, 2013 at 12:46)[9]

Nevertheless, LA wishes to wait until the Ministry of Justice's account of the consequences of signing the IC is ready before they decide whether or not to support the government's plan to sign it (ft.dk, May 24, 2013 at 12:46)[10]. Thus LA remains neutral on the question of supporting the IC. Moreover, their pledge to "*vote against all proposals, which focus on equality of result*" and rejecting all "*state regulations of gender relations ('al kønsregulering')*" might still stand (2017 Liberal Alliance party programme quoted in Dahlerup, 2018, pp. 204-205); or at least the idea that the IC holds requirements on *regulations of gender relations* could have had an influence on LA's slightly hostile reaction to it, since it does not fit the party's neo-liberal view on the "*limit to state intervention in the relations between the sexes...*" (Dahlerup, 2018, pp. 204-205). Thus, LA's discourse conveys their reservation about the content of the IC. Thus, the arguments in LA's

---

[8] *"Venstre er ikke enig i, at køn er en social konstruktion. Vi mener først og fremmest, at køn er biologisk, og derfor synes vi også, at det er underligt og malplaceret at skrive i en konvention, at køn alene er en social konstruktion."* (ft.dk, May 24, 2013 at 12:20)

[9] *"... derfor ønsker vi i Liberal Alliance en tidligere og langt mere konsekvent indsats fra myndighedernes side, når det handler om vold i hjemmet."* (ft.dk, May 24, 2013 at 12:46)

[10] *"... en udredning om, hvad det vil betyde for dansk lovgivning, hvis Danmark underskriver konventionen. Og så snart en sådan foreligger, vil vi tage stilling til en egentlig politisk drøftelse af, hvorvidt vi bedst bekæmper vold igennem danske initiativer, eller om det også kan være til gavn at underskrive konventionen og ad den vej sætte fokus på vold mod kvinder og vold i det hele taget."* (ft.dk, May 24, 2013 at 12:46)

discourse relies predominantly on the compatibility between the content of the IC and LA's own gender frame, rather than concerns about the top-down element of its ratification.

Preliminary Discussion

In this section I will compare the frames from the debate outlined above with some of the gender equality frames from the first part of the analysis (chapter 3.1.1).

Though Bødskov's discourse does not quite resemble that of the 'closed case' discourse, Bødskov evaluates the VAW initiatives introduced by the Danish government as high standard; thereby, he approves of the government's strategy to bring down VAW. This comment then demonstrates Borchorst and Dahlerup's (2003a) point about DK lagging behind the other Nordic countries' eagerness to improve on feminist issues such as gendered structures and stressing that there is work ahead before they can truly be satisfied with the state of their societies. What is more, Dahlerup's (2018) statement about the stagnation of gender equality reforms in DK could be used as an argument against Bødskov's reassurance about the initiatives. Although the government has introduced initiatives regarding elimination of DV, one might argue that this effort exemplifies the tokenism that Borchorst and Dahlerup (2003b) refer to, since there are no gender equality reforms to support it – i.e., it could be questioned how the issue of DV can be solved without adjusting the general gendered structures in society.

Adelsteen's discourse resembles the anti-gender discourse relying on hostility towards international elites or 'Brussels' as accounted for in the Theories chapter. Although it is subtle, one might argue that she is 'bending' the issue of VAW since this particular discussion – whether or not to sign the IC without reservations – offers a discursive opportunity to incorporate the frame of rejecting international institutions. Thus, the issue is bent in such a way that it becomes a discussion of rejecting international institutions rather than rejecting the objective of the gender equality initiative.

Taking a closer look at Øktem's discourse, it can be categorised as implicit in accordance with Krizsán and Popa's (2018) division of different modes of anti-gender discourses. Moreover, the dismissal of gender as a social construction might be considered a case of 'shrinking', which is detrimental for the overall cause of dealing with structural inequalities that facilitate VAW and DV. As mentioned in chapter 2.2, 'shrinking' often reduces an issue by confining it to a particular interpretation (Lombardo et al., 2009, p. 4). In this case, Venstre simplify the concept of gender, and, thereby, they simplify the social problem of VAW and perhaps the solutions that it requires. As

Lombardo et al. state, the lack of reflexivity in 'shrinking' causes a partial representation of reality (Lombardo et al., 2009, p. 5). Thus when the gendered structures in society can only be bound to the notion of gender as a biological term, the reality of the issue is only partially represented.

  LA's comment could be categorised as a case of tokenism, which, according to Borchorst and Dahlerup (2003b), is commonly found in the Danish political frame related to DV legislation. Furthermore, and as mentioned in chapter 3.1.1, this is problematic in the fight against DV because it prevents any profound progress. Likewise, LA advocates for more action on DV, but do not find it right to attend to the underlying issue of DV since it would require gender relations regulations aiming at equality as an outcome – an objective that they explicitly oppose in their party programme as mentioned above. As with Venstre's gender discourse leading to shrinking the issue of DV by disregarding gender as a social construction, LA's discourse, embedded in a 'tokenism frame', could perhaps also be linked to 'shrinking'. Moreover, LA's negative stance on state regulation of gender relations would lead to a reduction of the DV issue, i.e. shrinking it. This is similar to Lombardo et al.'s (2009) example of shrinking: the overall focus on structural power relations between men and women is lost in contemporary policies' pursuit to fix equal access to the labour market. Likewise structural, gendered power relations in society are lost in LA's gender discourse as it disapproves of the state's role in regulations of gender relations, while they request that the authorities interfere with family life in cases of DV. This perception of a solution might seem like a paradox, since it depicts a partial representation of the reality of the cause. The party's stance on gender signals that they are supporters of the 'closed case' discourse, which could also explain their paradoxical approach to this issue.

In the aftermath of GREVIO's 2017 report on DK, which criticised a few areas within Danish legislation, Roger Courage Matthisen from Alternativet (far left-wing party) sent a question to Mai Mercado, which was an inquiry about GREVIO's criticism of DK stating that the protection of mother and child in divorce cases does not suffice, which is a violation of the IC according to GREVIO[11]. In her reply, Mercado dismisses the question and states that the government does not recognise GREVIO's critique[12]. Adding to this statement, she argues that the Danish legislation on

---

[11] *"… når der tages stilling til, hvor et barn skal være efter skilsmisse fra en voldelig far, er vi i Danmark ikke god nok til at beskytte mor og barn. Ifølge ekspertgruppen bryder Danmark med Istanbulkonventionen…"* (ft.dk, October 4, 2018)
[12] *"Regeringen bemærkede i sit høringssvar, at regeringen ikke var enig i kritikken…"* (ft.dk, October 4, 2018)

the matter is in full compliance with DK's international commitments including the IC[13]. Mercado's reply shows that some of the liberal and conservative parties' skepticism towards state interference in care taking work within families might also apply here – though it is often a discussion related to maternity leave and paternity leave. In any case, her dismissive response indicates that there are still discursive opportunities to resist certain aspects of the IC, despite the fact that it has already been ratified.

3.2 HUNGARY

3.2.1 ANTI-GENDER FRAMES: NATIONAL FACTORS AND ACTORS

National History – Gender Equality

Starting with the historical perspective of Hungary's political framework on gender equality and feminism, the country's democratisation process is paramount (Krizsán & Popa, 2018, p. 105). Since Hungary's democratisation was constructed in accordance with classical liberal-rights frames, the debates throughout the transition phase did not inlcude any references to women and their rights in the new political setting; at least, there were no references other than the given, generic individual civil and political rights frame linked to the classical liberal framework (Krizsán & Popa, 2018, p. 105). At the time of the transition toward democracy, few women participated in the dissenting movements and few in the new political unit (Krizsán & Popa, 2018, p. 106). Due to this lack of representation of women, feminist issues were difficult to address, especially if they were presented as gender equality challenges. For instance, the earliest feminist issue that was put on the agenda, abortion, became an issue that was discussed on the basis of liberalism, i.e. the indivual's right to choose and not a feminist political issue (Krizsán & Popa, 2018, p. 106). Krizsán and Popa summarises the Hungarian conditions: *"The absence of women's rights from the early democratic political agenda of even leftist and liberal political parties defines the difficulty of framing domestic violence as a problem of gender inequality."* (2018, p. 106).

Gender Equality in a National Identity Framework

Revisiting Agustín and Sata's (2013) survey of Danish and Hungarian MPs' national identification with the issue of gender equality, only one Hungarian respondent, a woman (member of MSZP –

---

[13] *"Jeg mener (…), at forældreansvarsloven er i fuld overensstemmelse med Danmarks internationale forpligtelser, herunder Istanbulkonventionen."* (ft.dk, October 4, 2018)

socialist party), found the quest to achieve gender equality relevant and claimed that *"more protection for women should be available to ensure gender equality…"* (p. 67) On the basis of the results of their survey, they were able to identify a political divide in the way that *"the genderedness of Hungarian identity"* is portrayed (Agustín and Sata, 2013, p. 68). Accordingly, socialist MPs *"value gender equality"* more than conservative MPs in the Hungarian context (Agustín and Sata, 2013, p. 68). Similar to the Danish context, then, the political left-wing is more likely to agree with the statement that Hungary has not yet achieved gender equality, whereas the political right-wing, as a starting point, does not acknowledge gender as part of the national identity: *"'women do not suffer from inequalities' (FIDESZ)…"* (Agustín and Sata, 2013, p. 68) This means that the conservatives' 'self'-understanding does not accommodate experiences with gender discrimination in society, unlike the socialists' understanding of society. An MSZP member has even claimed that *"today there are people among the parliamentary parties who do not like the idea of the equality of sexes…"* (Agustín and Sata, 2013, p. 68) However, Agustín and Sata found that even though the idea of a gendered 'self' is more prevalent among left-wing politicians, it is still only women MPs who seem willing to include genderedness in their definition (Agustín and Sata, 2013, p. 68). Overall though, notions of genderedness did not come across as a natural aspect of either the *"national or the transnational consciousness"* of the Hungarian MPs (Agustín and Sata, 2013, p. 70). Thus the liberal framework in the Hungarian political context seems to restrict critical gendered discourses and allow for ignorance regarding gender equality issues.

Family- and Child-Protection Frames

The last decade's opposition towards gender equality has been powerful and highly institutionalised (Krizsán & Popa, 2018, p. 105). The Hungarian anti-gender equality actors have relied on an implicit anti-gender discourse, meaning that their pursuit to block DV interventions has focused on a family-protection frame, as well as the perpetrators' rights rather than an explicit disocurse with arguments about gender equality structures within society (Krizsán & Popa, 2018, p. 105). Thus, women's groups' efforts to advocate for political changes in the field of DV relied on a child-protection discourse void of gendered terms rather than one of gender equality, especially between the years of 2002 and 2006 (Krizsán & Popa, 2018, p. 106). In 2003, Hungary adopted the *Parliamentary Strategy on Preventing Domestic Violence*, which was the only document on the subject of DV that resonated with gender equality (Krizsán & Popa, 2018, p. 106). However, this document did not prompt political debates on DV from a gender equality perpsective. Instead, the

discourse was gradually shifted towards the family-protection discourse, effectively favoring the opposition's interests (Krizsán & Popa, 2018, p. 106). Thus the most dominating discourse competing with gendered discourses within the DV field is the family-protection frame. This can be detected in government officials' criticism against "gender ideology's" infiltration of European policies; for instance deputy PM, Zsolt Semjén, (president of KDNP), said: *"... gender ideology gets a brutal amount of support from Brussels. Small but loud interest groups in my opinion want to impose on the world a deviant worldview."* (Semjén quoted in Kovátz and Pető, 2017, p. 121); Using the same frame, Undersecretary of Family Affairs, Katalin Novák, claimed that certain Western governments have tried to sneak terms that seek to expand the notion of 'family' into EU and UN documents, and, according to her, the inclusion of these controversial principles does not fit the Hungarian government's standpoint (Kovátz and Pető, 2017, p. 121). The voices behind the family-protection discourse were primarily governmental experts, ministerial statements, and low-level policy documents (Krizsán & Popa, 2018, p. 106). Thus the veto-players in the Hungarian context, i.e. the people with resources to reach and influence political decisions on gender equality, are primarily politicians and experts who have established ties to the government.

On the basis of the dominating family-protection discourse, equal custody rights have been secured and mediation before seperation has also been promoted; the latter was put into practice by the 2009 Act on restraining orders, which symbolised the manifestation of the family-protection disocurse in Hungary (Krizsán & Popa, 2018, p. 106). On January 1, 2012, members of the governing coalition drafted 'the Fundamental Law' – Hungary's new family-oriented constitution – which defines family as *"the basis of the survival of the nation."* (Pivamyik, July 7, 2018). Likewise, in 2011 during the Hungarian EU-presidency, the government promoted this discourse, stating that the energy and support put into gender mainstreaming should be spent on family mainstreaming instead (Kovátz and Pető, 2017, p. 122).

After 2003, as a result of the family-protection discourse's co-optation of the discourse resonating with gender equality, women's movements started applying an explicit gender discourse and shunned cooperation with children's rights groups in order to keep the attention of DV discussions on gender equality (Krizsán & Popa, 2018, p. 106). The change towards a more explicitly gendered discourse was also the result of another strong, oppositional discourse. The perpetrator's right discourse successfully prevented progress in 2004, 2006, and 2009 (Krizsán & Popa, 2018, p. 106). This oppositional disocurse has been applied by institutional actors, e.g. from the Ministry of Justice, but also by a number of male MPs (Krizsán & Popa, 2018, p. 106). These people were able

to use their influence and apply technical arguments in relation to political debates on restraining orders. In this situation, whereby movement actors had been *"pushed (...) to outsider positions"* in the political debates on family and equality, women's groups attempted to use a similar discourse with references to technical elements but ended up limiting their own possibility of introducing a gendered aspect to the debate on the topic (Krizsán & Popa, 2018, pp. 106-107). The women's groups' strategy to use resonant frames and match the dominant, non-gender discourse might have been connected to Kovátz and Pető's finding: *"progressive actors and voices in Hungary are weak."* (2017, p. 126) In return for the change to a more explicit gender discourse, the women's groups were able to change their strategy and *"make more radically gendered claims about both the character of the reforms as well as the exclusive nature of the policy process"* in Hungary (Krizsán & Popa, 2018, p. 107).

Reintroduction of Gendered Discourse

According to Krizsán and Popa, radically gendered, oppostitional statements were not seen in political DV debates for many years (2018, p. 107). Nonetheless, in 2012 during a parliamentary session regarding criminalisation of DV, a centre-right politician stated that *"women would not brag so much about domestic violence if they had more children."* (Krizsán & Popa, 2018, p. 107). This statement caused outrage and created a discursive opportunity whereby street protests and a Facebook campaign facilitated a momentum resulting in a favorable vote on criminalisation (Krizsán & Popa, 2018, p. 107). Moreover, the highly gendered language applied by the gender equality opposition facilitated a window of opportunity for the women's groups to take up a gendered disocurse in political debates again (Krizsán & Popa, 2018, p. 107).

Gender Studies Ban

After CoE Commissioner for Human Rights, Dunja Mijatović, voiced her concerns about Hungary's current challenges regarding human rights, regional news outlet *emerging-europe.com* recently issued an article (Turp, February 12, 2019) on the case. The article referred to the low number of women MPs in the Hungary, making up only 12.6 % of the parliament, and the country's ranking as the second lowest country on the European Institute for Gender Equality's 2017 Gender Equality Index (Turp, February 12, 2019). The latest *Freedom of the World* report downgraded Hungary from the category of 'free' to the category of 'partly free' (Turp, February 12, 2019). According to the report, the downgrade is a result of Fidesz' (conservative party) *"attacks on the*

country's democratic institutions", which has imposed restricted or controlled *"the opposition, the media, religious groups, academia, NGOs, the courts, asylum seekers, and the private sector since 2010"* (Freedom House quoted in Turp, February 12, 2019). One example of restrictions being imposed by the party occurred in October 2018, when Orbán banned gender studies in Hungary, affecting two Universities that offered such programmes – state-run ELTE and the prestigious Central European University (AFP, October 17, 2018). Earlier in 2018, a list of researchers at the Academy of Sciences was published in a magazine owned by one of Orbán's allies; the list exposed academics who were working on *"gay rights and gender science"* (AFP, October 17, 2018). By critics, the attack on this academic field has raised concerns – the Political Studies Association stated that the ban *"calls into question the Hungarian government's commitment to the principles of democracy, which are the bedrock of European states"* (Oppenheim, October 24, 2018). Deputy Prime Minister Zsolt Semjen has said that gender studies *"has no business (being taught) in universities"*, since it is *"an ideology not a science"* (AFP, October 17, 2018; Oppenheim, October 24, 2018). According to the analytical organisation Freedom House's 2018 report on Hungary, these *"ideological attacks"* on academia and *"broader research on inequality"* have contributed to the country's down-graded freedom and democracy status to *"partly free"* (freedomhouse.org, 2019, D3).

Programs in higher education are supposed to be administrated by the Hungarian Accreditations Committee, and there has been no political interference in the Committee's work since 1990 (Pető, April 10, 2017). Pető explains the sudden political attacks on academia, gender studies in particular, by linking it to the government's project of *"building an illiberal democracy in Hungary"*, and, in this context, she states that *"the global fight against gender equality"* has reached Hungary (Pető, April 10, 2017). She refers to the symbolic glue of "gender ideology", which Paternotte and Kuhar (2017) and Kováts and Põim (2015) also argued in their studies. Pető argues how politicians have exploited popular discontent in Hungary to direct public attention towards questioning gender equality, but also to get away with attacking secular values in general, including human rights and equal opportunities; i.e., anti-gender frames are effectively added to the Hungarian government's anti-EU frame (Pető, April 10, 2017). Moreover, the Hungarian government is able to *"gain wider support for all of these measures by constructing a frightening image around the concept of "gender""*, why gender studies have suddenly been put at the centre of the *"heated public debate."* (Pető, April 10, 2017)

Due to the country's declining state of gender equality, the CoE Commissioner stated that the

need to raise awareness of VAW in Hungary is urgent and a *"ratification of the Istanbul Convention would be an essential step towards a comprehensive response to violence against women and girls…"* (Dunja Mijatović quoted in Turp, February 12, 2019).

3.2.2 DISCURSIVE OPPORTUNITIES IN DISCUSSIONS OF THE IC

<u>National IC debate timeline:</u> On March 14, 2011, Bajnai (Hungarian PM, 2009-2010) and his government signed the IC, but when the Orbán government came to power a year later, they refused to ratify the convention on the grounds that it conveys radical feminist ideas and it *"discriminates against men."* (hungarianspectrum.org, September 15, 2018) Supported by 36 MPs, MP Zsuzsanna Szelényi (Együtt – social-liberal party) turned in a proposal in March, 2015, to speed up the ratification of the IC (hungarianspectrum.org, February 18, 2017). Both the Fidesz-KDNP alliance (the ruling, conservative coalition) and Jobbik (conservative, far right-wing party with nationalist roots) voted against Szelényi's proposal (hungarianspectrum.org, February 18, 2017). On February 1, 2017, after two years with no progress, a small group of feminists held a demonstration outside the parliament building (hungarianspectrum.org, February 18, 2017). This small demonstration spawned reactions from Fidesz as well as Fidesz-supporters. Later that same year, in November, 2017, socialist MP Ildikó Borbély demanded a ratification of the IC in a session at the National Assembly, which did not result in any action either (Spike, November 28, 2017).

Family- and Child-Protection Frame

In November, 2017, when socialists and the green party LMP demanded ratification of the IC; an article from thehungaryjournal.com reported that the Fidesz-Christian Democrat government's response was that the convention goes against *"traditional family values"* (thehungaryjournal.com, November 26, 2017); socialist MP Ildiko Borbély responded that the government's comment depicts their support for "*violence against women, children, the mentally disabled and pensioners within the traditional family model"* (thehungaryjournal.com, November 26, 2017).

 The article from hungarianspectrum.org states that Szelényi's proposal to have the IC ratified sooner, back in March, 2015, was never expected to be supported by Jobbik, because, according to the conservative, nationalist party, the IC *"is not concerned with the most widespread and most brutal domestic violence, the act of abortion…"* (February 18, 2017) This statement emphasises the depth of the family- and child-protection frame; it is a discourse whereby the concept of 'female' is represented in the capacity of reproductive obligations and motherhood, and the life of an unborn

child is valued over the protection of the woman against violence. As mentioned in chapter 2.2, Lombardo et al. (2009) argued that the labels attached to the compound concept of 'gender (and) equality' varied depending on the national context (p. 1). In a Hungarian context, *"reproductive relations"* (Lombardo et al., 2009, p. 2) are foregrounded by Jobbik's family-protection discourse − a discourse which could be categorised as an implicit anti-gender, and definitely anti-feminist due to their stance on abortion as an act of violence.

Other negative reactions to Szelényi's proposal spawned included a short article in the Hungarian *WMN Magazine* written by Szilvia Gyurkó, a highly profiled children's rights lawyer recognised as an expert within her field. In her article, she lists three reasons explaining the government's hostility towards a ratification: 1) DV rarely occurs in Hungary, 2) the IC categorises minor acts of inappropriate behavior toward women as sexual abuse, and 3) the government's effort to protect women from violence and harassment is sufficient (hungarianspectrum.org, February 18, 2017). It is evident from these arguments that downplaying and denying the severity of VAW in Hungary is applied as a discursive tool in this framing. Regarding Gyurkó's first claim, a study from 2014 showed that *"27 % of girls under the age of 15 experience physical, sexual or psychological abuse."* (hungarianspectrum.org, February 18, 2017). Furthermore, her ignorance of the severity of DV matches Fidesz' representation of the reality of gender equality in general, as expressed by one of the party's members in Agustín and Sata's (2013) survey: *"'women do not suffer from inequalities' (FIDESZ)…"* (p. 68) Gyurkó's article confirms Krizsán and Popa's (2018) characterisation of the anti-gender discourse throughout the last decade in Hungary as institutionalised and reliant on the family- and child- protection frames (p. 105). Additionally, they mention how the voices behind the child-protection discourse include governmental experts (Krizsán & Popa, 2018, p. 106). Although Gyurkó is no governmental expert, she is still an expert whose voice holds authority as a result of her occupation and experience with children's rights. Thus, her input adds to Krizsán and Popa's notion of the recent Hungarian anti-gender discourse as powerful and institutionalised.

The conservative discourses on gender roles from the debate about the IC accounted for above resemble Orbán's discourse on women's role in society. According to an article by The Guardian, Orbán's discourse on women *"has frequently been dismissive and insulting, and usually focuses on their role as child-bearers and home-makers."* (Walker, December 21, 2018). When he was questioned about the lack of women in government in 2015, he explained that *"few women could deal with the stress of politics."* (Walker, December 21, 2018; Pivarnyik, July 4, 2018) And in

2017, when asked about the sudden withdrawal of the Hungarian ambassador to the US, Réka Szemerkényi, he blatantly stated that he does not comment on *"women's issues"* (Walker, December 21, 2018; Pivarnyik, July 4, 2018).

Anti-Immigration Frame

In response to the demonstration on February 1, 2017, a Fidesz spokesman said:

> *"... at the moment, immigration and the settlement of migrants are the greatest dangers in Europe. Wherever migrants appeared violence against women and children skyrocketed (...). Those same opposition parties that keep worrying about women in roundtable discussions prevented parliament from modifying the constitution to prohibit the settlement of migrants."* (hungarianspectrum.org, February 18, 2017)

This statement encompasses the essence of Lombardo et al.'s (2009) concept of 'ehtnicising' issues of gender equality, specifically related to DV and VAW.

Journalist Justin Spike, from the news site thebudapestbeacon.com, confirms the government's migration frame by referring to the National Assembly session in November, 2017, in which Borbély asked Orbán if his government intended to hold on to their rejection of the IC (Spike November 28, 2017). During the debate, Orbán stated that respect for women is the foundation of Hungarian as well as European culture, but this foundation is threatened now that *"millions of migrants"* are arriving, who are both violent and disrespectful towards women (Spike, November 28, 2017). Then, he encouraged Borbély to *"help the government so we can protect Hungary and Europe from migration, and this way we can do the most to combat violence against women."* (Orbán cited in Spike, November 28, 2017)

Preliminary Discussion

In this section I will compare the frames from the political discourse on DV and VAW, outlined above, with some of the gender equality frames from the first part of the analysis (chapter 3.2.1).

The overview of the traditional, family-protection frame in Hungarian right-wing political discourse, accounted for above, clearly corresponds to Agustín and Sata's (2013) finding that the political left-wing in Hungary is more likely to acknowledge gender inequality and the limits to the

national gender equality framework. Thereby, they seem to be the only actors in Hungarian politics who are interested in ratifying the IC. For instance, considering Borbély's critical interpretation of the governemnt's comments on the issue as a depiction of their support for *"violence against women, children, the mentally disabled and pensioners within the traditional family model"* (thehungaryjournal.com, November 26, 2017). Then there is also the example of Szelényi's proposal in 2015 to speed up the ratification process, which the right-wing parties voted against.

Jobbik used the discursive opportunity of the debate on the IC to introduce the issue of abortion, which conveyed their conservative view on the issue, aimed at 'bending' the focus on DV onto a discussion of abortion instead. Their discourse relates to the radical child-protection frames which are critical towards the feminist project of "gender ideology" whereby abortion is included as a key issue. Accordingly, in some aspects, Jobbik's comment can be compared to the "gender ideology" theorists' conspiracy-strategy of portraying abortion as a *"mystery of evil"* which opposes the *"culture of life"* (Paternotte and Kuhar, 2017, p. 6).

Children's rights lawyer Szilvia Gyurkó's article supporting the Fidesz-KDNP government's reluctance to ratify the IC also seizes the discursive opportunity to apply 'shrinking'. Her list of arguments literally shrinks the issue of DV by depicting another reality of DV in Hungary than what the numbers from surveys and studies have indicated.

Orbán's persistent arguments relating the issue of VAW to the flow of migrants into Europe is a case of scapegoating, where his strategy is to ethnisice the issue. This is an attempt of 'bending', whereby he seeks to shift the focus away from the relevance of the IC in the critical view on the socio-cultural context of Hungary. Orbán's discourse demonstrates how the European refugee crisis facilitates discursive opportunities to bend various social and financial challenges onto the heavily criticised issue of national and European immigration capacity and policies.

As mentioend in chapter 2.3, the discourse of scapegoating as well as the construction of conspiracy theories, i.e. ways of creating an image of the *"dangerous Other"* based on the image of *"collective stereotypical imaginaries"* have been identified by Wodak as a part of the *"toolkit of right-wing populist rhetoric"* (Paternotte and Kuhar, 2017, p. 14). Thus, both Jobbik's and Orbán's discourses are part of this strategical, right-wing/populist framework.

3.3 GERMANY

3.3.1 ANTI-GENDER FRAMES: NATIONAL FACTORS AND ACTORS

According to *The Policy on Gender Equality in Germany* (2015), a report created for the FEMM Committee of the EU Parliament, Germany's *"performance in achieving gender equality is mediocre"* and the European Gender Equality Index ranked Germany *"lower than the EU average."* (Botsch, 2015, p. 8) This chapter focuses on some of the German society's complex frames that challenge progress in regard to gender equality policies.

In the German case, the historical perspective of the country's political framework on gender equality and feminism is especially important to account for, since certain structures and mindsets reappear in recent gender debates.

National History – Gender Equality

In a historical perspective, a *"resonant framing of women is as 'mothers'"* in terms of the gender discourse that exists within the political framework (Ferree, 2009, p. 93). This discourse was prevalent in West Germany. The political circumstances of the Cold War resulted in a *"national state-family-market relations"* division, where the *"housewife-breadwinner couple"* was the idealised Western Germany, whereas the *"heroic worker-mother"* was prominent in Eastern Germany (Ferree, 2009, p. 93). After Germany's reunification in 1989, their family policies have been subject to a greater de-gendering transformation, which has sparked much debate, since they implicitly keep leading to reinvestigations of the recent past of the East/West divide (Villa, 2017, p. 101). There was a shift away from traditional *"mommy politics"* and towards a more supportive view on care duties detached from *"biological predefinitions"* (Villa, 2017, p. 101). This shift has provided better conditions for women and mothers to pursue their careers, and, at the same time, fostered new debates on related topics like gender pay gaps, discrimination on the job market, and quotas (Villa, 2017, p. 101). This said, the working mother continues to carry a negative stigma as she does not impersonate the *"normative ideal of mother-as-natural-femininity"*, meaning that she is willing to outsource care duties for her children, which is considered negligence of their needs (Villa, 2017, p. 101). Particularly in western Germany, the *"bad mother's"* perceived non-traditional lifestyle choices are even presented as a threat to the moral integrity of the entire nation's future (Villa, 2017, p. 101). This stigma can be traced back to the East/West divide in the family ideals that Ferree (2009) highlights.

In Germany, the polemic anti-gender discourse rose in mid 2000s, but did not become prominent until 2013 approx. (Villa, 2017, p. 99) The wording of the concept – 'Genderismus' – is with its suffix, '-ismus', put into the same category as 'Faschismus', 'Kommunismus', and the like, i.e. it carries negative connotations (Villa, 2017, p. 99). More specifically, the connotations suggest that gender is related to totalitarianism and danger (Villa, 2017, p. 99). The diffuse and broad character of anti-genderismus functions as a symbolic glue for different actors ranging from *"anti-statal"* and *"anti-EU"* activists to the most active groups: *"ethno-nationalist, racist and/or xenophobic, aggressively hetereonormative and overall anti-pluralistic constellations which form the core of contemporary neoconservative and right-wing populism in Germany."* (Villa, 2017, p. 99) Thus, "gender ideology" has engaged people from all these different groups in alliances, enabling mobilisation of thousands of people on the streets in events like the *"Demonstrations for All" (Demo für Alle)"* in Stuttgart in 2014 (Blum, 2015, p. 47). This movement was clearly inspired by the French movement *"Manif pour Tous"* and its message was *"Marriage and family! Stop gender ideology and sexualisation of our children!"* (Blum, 2015, p. 47)

The overall anti-gender framework in Germany revolves around right-wing rhetoric. Hereby, the *"concerned citizen"* expresses concerns about loss of privileges for certain groups of people, an *"arguably irrational defense of an overall impression or perhaps concrete experiences of precarity in Germany"*, and loss of *"normality"* – i.e., a sense of natural stability through exclusion of certain subjects or identities that did not fit into *"natural"* categories – categories such as *"woman, child, sexuality, body"* etc. (Villa, 2017, p. 100). Accordingly, the anti-gender discourse offers *"a sense of social unambiguousness that certain groups feel has been lost."* (Villa, 2017, p. 100)
   Villa states that the current German anti-gender discourse is positioned within *"broader political dynamics (especially right-wing-populism)"* (Villa, 2017, p. 100). She also argues that the *"increased visibility and political relevance of (...) complex gender(ed) persons as well as their cultural and political expressions are "correctly" understood by those who fight them"*, but their tactic, then, is to apply populist rhetoric in an effort to *"ridicule them as "academic", (...) artificial, ideological, perverse/sick, dangerous, elitist"* etc. (Villa, 2017, p. 100).

Between 2006 and 2007, several books and articles were published within *"culturally bourgeois-conservative mainstream"* outlets such as the newspapers 'Die Zeit' and 'Die Welt' (Villa, 2017, pp. 102-103). These writings warned against gender-mainstreaming, arguing that it represents

unnatural views of women and men, and even a means by which "Brussels", i.e. the EU, is able to impose its policies onto unsuspecting and powerless peoples.

Anti-Immigration Frames

Another perspective which is detrimental to the German context is immigration and multi-culturalism combined with Euroscepticism. For decades, their rhetoric has revolved around a denial of immigration and multiculturalism, especially in regard to Turkish immigrants and Islam in relation to "German Culture" – and whether or not the latter even exists and, if so, should be nurtured (Villa, 2017, p. 102). Villa finds it surprising that Germany has not had any prominent radical right-wing party with anti-migration views until recently when AfD stepped on to the political scene (2017, p. 102). The reason for the delay of expressing such views, compared to the political scenes in the rest of Europe, she ascribes to Germany's history, involving racism and anti-Semitism (Villa, 2017, p. 102).

Especially within populist and nationalist anti-gender discourse, an 'us vs. them' rhetoric is often used as a tool; henceforth, 'us' equals *"us Germans, us tax payers, us voters, us commonsense and normal people"* whereas 'them' equals *"them nonsensical academic and irrational lobbyists, them up there, them detached from reality, them elites."* (Villa, 2017, p. 109) This dichotomy is applied to a great extent in anti-EU rhetoric (Villa, 2017, p. 109).

Family-Protection Frames

As mentioned above, Germany has made great advancements towards more gender equality both overall by signing several international treaties and by abandoning discriminating laws, but also in terms of homosexuals' rights. Homosexual partnership was legalised in 2001, however, same-sex marriage has been blocked because of conservative political majorities and their conservative, heteronormative views and also because of several court decisions vis-à-vis the *"special protection of marriage and family"* (Villa, 2017, p. 101), which is stated in the German Constitution (Blum, 2015, p. 53). This means that gay couples cannot adopt, since only married couples are allowed this opportunity (Villa, 2017, p. 101)

> *"The assumption that "gender" forces women (and men) out of their traditional roles and destructs the "natural" family appears therefore not so much a religious argument, but rather a strong secular common belief shared by an important share of German society"* (Villa, 2017, p. 104)

In relation to religious actors in the German gender debate, neither the Catholic Church nor the Protestant Church are very prominent compared to other European countries. However, there are still certain groups within those religious communities, which have made themselves heard and taken a strong stance against gender despite the fact that the official German Protestant Church has expressed a progressive attitude towards family and offered religious support for non-identity based plural family constellations (Villa, 2017, p. 107). Nevertheless, there are other streams within the religious community putting more conservative values on their agenda. Since 2014, the *"new populist, right-wing, nationalist, anti-migratory and anti-EU"* party Alternative für Deutschland (AfD) has enjoyed a sudden rise and electoral success (Villa, 2017, p.108). The party was founded in 2012 as a *"citizens' initiative"*, and in 2013 it became an official political party (Blum, 2015, p. 43). Beatrix von Storch, vice president of AfD, founded and leads several networks advocating against the same issues as AfD, such as same-sex marriage (Villa, 2017, p. 107). One of these networks is Zivile Koalition e.V., which officially focuses on an anti-EU agenda, however, von Storch's activity related to this group has repeatedly involved organising and speaking at demonstrations revolving around resistance towards *"liberal and pluralist sexual education in schools"* as well as *"(women's) reproductive rights."* (Villa, 2017, p. 108) By being present across different platforms – both in the German parliament as an MP and within these kinds of civil groups – she is a facilitator of the connections created between *"particular religious (Protestant) anti-gender groups"* and the *"increasingly relevant populist, anti-migratory right-wing party in Germany"*, i.e. AfD (Villa, 2017, p. 108).

Villa explains how the German gender 'angst' is *"condensed"* in its relations to pedophilia and sexualisation of children (2017, p. 110), and the rhetoric applied by anti-gender actors often contains *"moralising, severe and dramatic"* language that warns about *"gender ideology's"* *"sick"* divergence from *"normality"* by creating narratives around *"dreadful worst case scenarios"* (Blum, 2015, p. 54). This frame resonates with Christian and other religious contexts where sexuality is a distant and suppressed concept (Villa, 2017, p. 110).

In an article that summarises an interview between von Storch and professor Ulrich Kutschera – professor of plant physiology and evolutionary biology, known for his gender-critical book *Das Gender-Paradoxon* (2016) – both the family- and the child-protection frames are applied in an effort to undermine "gender ideology" (zivilekoalition.de, August 5, 2018). The interview was shown on Freie Welt TV on May 7, 2018. He states that 'family' is a core value in society, and the biological bond between parents, especially mothers, and their children is solid; Thus same-sex

couples will not be able to replace the combination of a mother plus a father as parents: *"You cannot break a family. Then you destroy everything."* (Kutschera quoted in zivilekoalition.de, August 5, 2018)[14] Kutschera points out his aversion against another unnatural (*"gegen die naturwidrige"*) and ideological aspect of gender projects that allegedly impose early sexualisation of children in kindergartens (*"Frühsexualisierung"*): *"This is nothing but a frontal attack on the souls of innocent children."* (Kutschera quoted in zivilekoalition.de, August 5, 2018)[15] Kutschera's references to ideology and the dangers of imposing it on young children speak directly into the "German angst"; thus his statements support negative notions of gender as a totalitarian and intrusive strategy that colonises the privacy of people's family life and sexuality. Without saying 'Genderismus', he manages to convey the exact same negative connotations of gender and gender mainstreaming by combining the family- and child-protection frames with the frame of political coercion; the latter is especially powerful in the German context due to the country's sensitivity to anything that might be framed as radical ideological projects. As Paternotte and Kuhar (2017) stated, gender projects are within the child-protection frames depicted as *"particularly threatening to children, who would be indoctrinated from very early age in school, often without their parents' awareness."* (p. 6) Moreover, actors with an anti-gender agenda will also categorise it as *"hyper-sexualization of children"* (Paternotte and Kuhar, 2017, p. 6). To that end, Kutschera is clear about the perverted character of *Frühsexualisierung* attacking *innocent children*. Moreover, this interview demonstrates the potency of the symbolic glue that the "Gender Ideology" frame provides.

Negative Framing of Gender Studies

Within the last two-three years, articles attacking gender studies as an academic discipline have been published in well-established, conservative newspapers, sharing the idea that gender studies is equal to creationism as opposed to evolutionary ontology; i.e., it is classified as a religious or ideological belief system rather than scientific evidence (Villa, 2017, p. 111). To some, it might be surprising to see this *"scientifically outdated nature/nurture-dichotomy"* resurfacing at this point in time (Villa, 2017, p. 111). The political parties analysed in Blum's chapter on Germany in the book *Gender as symbolic glue: The Position and Role of Conservative and Far Right Parties in the Anti-Gender Mobilizations in Europe* (2015) tended to be skeptical or even opposed to advancing gender

---

[14] *"Familie kann man nicht kaputt machen. Dann zerstört man alles."* (Kutschera quoted in zivilekoalition.de, August 5, 2018)

[15] *"Das ist nichts anderes, als ein Frontalangriff auf die Seelen unschuldiger Kinder"* (Kutschera quoted in zivilekoalition.de, August 5, 2018)

studies (p. 40). Some of the parties claimed that it is a field with non-relevant issues compared to other studies, while other parties openly expressed concerns about its validity and its message of *"genderism"* (Blum, 2015, p. 40).

The condescending portrayal of gender studies as *"quasi theological ideology"* is also reproduced by German university professors (Villa, 2017, p. 108); especially professors working in the science fields like biology like Klein, a *"senior evolutionary biologist and chair of the German association for Didactics in Biology"*, who are looking to have gender studies banned from academia and off public funding (Villa, 2017, p. 108). Professor Kutschera, who also commented on the dangers of "gender ideology" in relation to family and children, referred to the field of gender studies as a *"cancer tumor"* within the *"otherwise healthy academic body"* (Villa, 2017, p. 111). The negative attitude debates on gender studies often returns to complains about funding, despite the fact that gender studies make up only 0.4 % of fully or partly dedicated chairs and professorships in German universities (Villa, 2017, p. 112).

3.3.2 DISCURSIVE OPPORTUNITIES IN DISCUSSIONS OF THE IC

<u>National IC debate timeline:</u> Although Germany signed the IC as one of the first nations on May 11, 2011, it would be six years until it was finally ratified (October 13, 2017) (CoE, 2019c). The delay was caused by discrepancies in the accordance between the requirements of the convention and German law on sexual assault and rape. By German law a sexual assault was only prosecuted as a crime in cases where it could be proven that the victim had physically resisted the attack (Weber, 2016, p. 18).

A few weeks after the chancellery approved of a revision of the federal law on sexual assault, the 2015 New Year's Eve mass assault on women in Cologne happened (Weber, 2016, p. 17). The revision of the reform on sexual assault and rape law had not attracted much attention in media but, in the aftermath of Cologne, news media covered the incident intensely and political actors were quick to express support for the reform, which was discussed in January just after the incident and passed July 7, 2016 (Weber, 2016, p. 18).

In the German case, I found two types of frames whereby the responses to the IC are depicted. One is the parliamentarian frame, which mainly focuses on anti-immigration in relation to the convention. The other frame is the civil society movements/organisations' frame, which conveys more of a women's rights discourse.

Anti-Immigration Frame

The timing of the reform revision and Cologne presented a discursive opportunity by which references to the expanded definition of sexual assault, i.e. including groping, were put in connection with the Cologne incident, since most of the cases reported from that night led nowhere in terms of prosecution due to the deficient German law (Weber, 2016, p. 19). In a Washington Post article *New stricter sexual-assault laws in Germany are making refugee activists uneasy* (Kirchner and Noack, July 7, 2016), it becomes clear how left-wing politicians are hostile towards the anti-immigration frame that have been applied in the parliamentary discussions on the subject. Halina Wawzyniak (Die Linke) said that *"[t]he debate used to be about 'no means no' — now all that is being talked about in social networks are foreigners again…"* (Kirchner and Noack, July 7, 2016). Wawzyniak fear was that the reform would allow *"disproportionate"* sanctions for minor offenses committed by asylum seekers, who then risked being deported (Kirchner and Noack, July 7, 2016). Conversely, Elisabeth Winkelmeier-Becker (CDU) said that the people who had not actively harassed the women in Cologne, but had indirectly helped facilitate it *"also act in a way that contributes to the hopeless situation of the victim and is part of the powerlessness the victim feels…"* (Kirchner and Noack, July 7, 2016) Hereby, she emphasised the revised law's capacity to punish those people as well. Another Washington Post article reported on AfD's reaction to the Cologne incident: *"[T]he appalling consequences of catastrophic asylum and migration policies."* (Noack, January 6, 2016)

Weber (2016) also accounted for a few of the politicians' comments on the revised law. Thomas Strobl (CDU) emphasised the advantages of tightening the law:

> *"This coalition does not only discuss, it acts. This is also true when it comes to deportation of foreigners and those who have applied for asylum who have been sentenced for a crime. It is beyond explanation how one can flee from violence, rape, torture and war and then do something similar here. It is appropriate to remove such people from the process of asylum."*
> (Strobl quoted in Weber, 2016, p. 18)

Social Movements' Discursive Opportunities in the German Gender Equality Debate

Mobilisations of both pro- and anti-gender movements have been carried out in mass numbers, and so social movements have played a more central role in relation to the most recent gender equality debates in Germany. Furthermore, the movements' discourses have evidently infiltrated the political

debate. On one end, the 'no means no' campaign succeeded in reaching politicians, who repeatedly referred to the importance of the campaign's message in the parliamentary discussion on reforming Germany's sexual assault and rape law; for instance, Ulle Schauws, member of Die Grüne, stated that without the pressure from society, the "No means no" principle would not have been introduced as a law (bundestag.de, 2017)[16]. Furthermore, Die Grûne criticised the government's reservation in its ratification of the IC: refusal to grant refugee women and girls residence permits (bundestag.de, 2017)[17]. On the other end of the gender debate, demonstrations such as 'Demo für Alle' (2014), a movement clearly inspired by the French movement *"Manif pour Tous",* have attracted thousands of people and taken over the streets (Blum, 2015, p. 47).

A press release by the German women's organisation *Der Deutsche Frauenrat* from July 8, 2016, translated and posted on womenlobby.org (July 13, 2016), states that the reform was well received by women's organisations, who saw it as a *"historical step"* and a much needed paradigm shift (womenlobby.org, July, 13, 2016). President of the National Council of German Women's Organizations (Der Deutsche Frauenrat), Mona Küppers said: *"The big success of the legal reform is, that the right to say 'no' finally is protected by law."* (womenlobby.org, July, 13, 2016) Thus, victims of sexual assault no longer need to prove their active resistance, rather, the perpetrator's conduct will be decisive of the verdict (womenlobby.org, July, 13, 2016). Women's organisations in Germany had campaigned for years to see changes in the perception of sexual assault in criminal law, and the recent "no means no" campaign finally facilitated an opportunity to create a broader coalition between progressive gender actors (womenlobby.org, July, 13, 2016). The campaigners relied on the standards stated in the IC to argue that the German government ought to fulfil its *"political obligations at national level and European level."* (womenlobby.org, July, 13, 2016) Der Deutsche Frauenrat played an important part in the campaign, and, looking to their website, they published several articles and press releases pressuring the government to fully implement and comply with the IC; for instance: "EINRICHTUNG EINER NATIONALEN KOORDINIERUNGSSTELLE ZUR VOLLSTÄNDIGEN UMSETZUNG UND EINHALTUNG DER ISTANBUL-KONVENTION SOWIE EINER UNABHÄNGIGEN MONITORINGSTELLE" (frauenrat.de, June 25, 2017), an article encouraging the government to set up a national coordination agency and an independent monitoring agency, and "ISTANBUL-KONVENTION

---

[16] *"Ohne den gesellschaftlichen Druck wäre „Nein heißt Nein" nicht als Gesetz eingebracht worden…"* (bundestag.de, 2017

[17] *"Zugleich gebe es Grund für Kritik: Die Weigerung der Regierung, geflüchteten Frauen und Mädchen ein eigenständiges Aufenthaltsrecht zu gewähren, sei nicht glaubhaft."* (bundestag.de, 2017)

OHNE VORBEHALT UMSETZEN" (frauenrat.de, November 23, 2017), calling on the government to prepare a strategy for the implementation of the IC in order to be able to comply with its requirements.

Preliminary Discussion

The 'no means no' campaign followed by the reform of the rape law is an example of a positive reaction to the IC, and the feminist ideals and gender equality objectives of it did not seem to cause much resistance in the parliamentary discussion of the matter. Nevertheless, the Cologne incident provided a discursive opportunity of 'bending', and, as with the Hungarian political discourse, immigration was quickly foregrounded. Hereby, the issue of VAW was ethnicised and, as Weber critically stated,

> *"...to link attention to sexualized violence to the necessity for greater surveillance of refugees, who should also be easier to deport, is both to obscure the longstanding problem of sexualized violence in German and other European societies while simultaneously appropriating anti-violence discourses in order to expel certain populations from German space."* (Weber, 2016, p. 18)

However, the ethnicising of the issue is not readily accepted among the German politicians; for instance Wawzyniak (Die Linke) criticises what is essentially 'bending', and women's organisations such as Frauenrat works diligently to remind the government of its obligations to comply with the IC's requirements.

The quote from Weber (2016), points to the anti-immigration frame that has only recently appeared in German politics in step with the rise of AfD. In the article from washingtonpost.com, quoting AfD, it is clear that the party is quick to take advantage of the discursive opportunity of the Cologne incident to promote their xenophobic rhetoric.

Although the ethnicising of VAW in the German law reform debate does not reflect resistance of the IC or its feminist ideals, the bending of the issue might depict a dilution of the IC's intended effect. By this, I mean that the anti-immigration frame's successful infiltration of the political VAW debate indicates how quickly the gender-debate might become overshadowed by it, and this diversion might take away from responsibility that is demanded by the IC, namely the responsibility to revise gendered structures in society. Although, it might not be intentional on the politicians' behalf to derail the discussion of VAW – as discussed, frames can be *"unintentional"* and infiltrate policy debates, affecting the representation of a given problem (Lombardo and Meier, 2009, p. 140)

– it depicts the strong influence of right-wing rhetoric promoting anti-immigration messages. The issue with it is that this discourse is not compatible with feminist ideals such as those presented by the IC. Rather, the frame that some of the German political parties and MPs apply resonates with anti-gender frames; as Ferree stated, determining whether frames are either 'resonant' or 'radical' in relation to the network of available frames will indicate the direction of the frames in terms of gender and gender equality. Moreover, the concepts that the anti-immigration frame holds within the political system of discursive structures will typically also *"embrace existing connections"* of anti-gender concepts (Ferree, 2009, p. 92). Therefore, the reproduction of *"the very old trope of the sexually dangerous racialized other"* in the rape law reform debate, as Weber describes it (2016, p. 19), does not necessarily challenge or damage the efforts of anti-gender actors, because the politicians fail to attend to the issues of gendered structures and gender roles in society in relation to VAW.

DISCUSSION

In order to compare my three cases accurately, it is important to consider agencies in each case. As I have accounted for, I included the most influential anti-gender actors and the most prominent discourses, which naturally vary in different contexts. A politician represents a party and its specific ideological perspective as well as priorities, and, as mentioned in chapter 2.1, the concept of DOS presents variations of convenience to different actors so that certain frameworks and their associated discourses present restrictions to some social actors while supporting the purpose of other groups. Furthermore, Ferree's analogy, comparing the framework of scientific disciplines and the political field, stated that politicians are usually guided by certain protocols that are guided by *"authoritative texts such as constitutions, laws, judicial decisions, treaties and administrative regulations."* (Ferree, 2009, p. 89) This is interesting for the investigation of the German case, where the alignment of national laws prevented progress in the ratification process. Adding to that, the country's sexual assault and rape law seemed to dictate the discourse on rape – the women's organisation Der Deutsche Frauenrat even stated that the reform of it facilitated a paradigm shift in the framework of VAW, which indicate the authority and influence that texts such as a laws are able to project onto gendered power structures in society. This aspect, then, also applies to the IC, which presents a (discursive) opportunity to revise and criticise the status of the gendered structures of a given society, or, conversely, reject the values that the convention offers.

To that end, it makes sense to compare the discursive strategies and frames of the three cases in

terms of responses to gender equality policies and the feminist ideals of the IC despite the differences in the data sources and actors. It makes sense because the discursive strategies of resistance reflect the dependent variable of the national gender equality frames, and therefore my comparison of the most influential and prominent anti-gender actors' discourses in different national contexts can still contribute to a mapping of the tendencies of the anti-gender discourses that might challenge the IC.

Similarities

Even though the degrees of resistance between the countries in question vary, there are still similarities to be found. For instance, the anti-EU discourse offers a common ground. This similarity seem to qualify as one of the main challenges to the overall acceptance of the IC regardless of the national context, because this concern is based on attitudes towards the governing, institutionalised policy standard framework that the IC embodies (the CoE) rather than the framework of national gender equality policies. The arguments within this frame rely on resistance against international elites' imposing political agendas (Paternotte and Kuhar, 2017, p. 14). Hence, the frame that captures these concerns is easily transferred into diverse cultural and political frameworks. Then these common concerns might be based on different motifs or utilised by actors taking advantage of the potential to promote their agenda alongside this specific resistance discourse – for instance actors that are skeptical towards "gender ideology" in Germany versus actors that prefer liberal gender definitions in DK or conservative advocates for traditional gender roles and families in Hungary. Regardless of the intentional/unintentional promotion of these underlying motifs, the anti-EU/anti-institution discourse functions as a resonant frame for anti-gender actors, who use the discursive opportunities that it provides to resist gender equality initiatives or frame them as infringements on the national sovereignty.

The anti-immigration frame makes up another similarity in the discussions of the IC between the three cases. As Paternotte and Kuhar's reference to Wodak stated, *"… anti-gender and populist campaigns utilize similar discursive strategies, identified by Wodak (205, 4) as the necessary toolkit of right-wing populist rhetoric: victim-perpetrator reversal, scapegoating and the construction of conspiracy theories."* (2017, p. 14). Thus this similarity can be identified as a result of the right-wing rhetoric that has recently started to flourish throughout Europe. As Ferree argues, the concepts that the anti-immigration frame holds within the political system of discursive structures will typically also *"embrace existing connections"* of anti-gender concepts (2009, p. 92). This

connection is also recognised by Weber in her critical article on the German parliamentary discussion of rape law reform, which, according to her, essentially reproduced *"the very old trope of the sexually dangerous racialized other"* (2016, p. 19). Accordingly, discussions around the objectives of the IC seem to facilitate a discursive opportunity to 'bend' the issue of VAW and result in 'scapegoating' – a frame which is not 'resonant' with the feminist framework according to which the IC has been created. Therefore, the anti-immigration frame, though it does not work actively against the IC, it does have potential to obscure the values of the convention – a framing that Wawzyniak (Die Linke) warns against, and a framing that Orbán uses as a discursive strategy: the threat of the arrival of *"millions of migrants"* towards women's safety (Orbán quoted in Spike, November 28, 2017). The same discourse appeared in Danish politics; for instance Anders Fogh's reference to *"'oppressing family patterns' among immigrants"* (Dahlerup, 2018 p. 191) as well as DPP's continuous use of the anti-immigration frame in political discussions.

Differences

One of the differences between the three cases is the discourse relating to gender roles. While the German and Hungarian gender equality discourse share certain perspectives on traditional gender roles and the nuclear family, DK diverges in this particular aspect.

It is important to remain critical towards the limitations of the Hungarian data, which is comprised of news media sources: these articles might highlight the negative reactions more so than the positive, pro-gender equality ones. However, the secondary literature of the general gender norms in Hungarian political discourse testifies to the centrality of conservative, traditional values in regard to gender roles and equality; e.g. *"... progressive actors and voices in Hungary are weak."* (Kovátz and Pető, 2017, p. 126) and *"... 'women do not suffer from inequalities' (FIDESZ)..."* (Agustín and Sata, 2013, p. 68).

The heteronormative standards found in Hungary is also part of the anti-gender frames in Germany. Paternotte and Kuhar state that one explanation to the mobilisation of anti-gender attitudes is found in the rise of right-wing populism, which relies on *"nostalgia for a lost golden age, where everything was simpler and genders were what they looked like"*; thus, right-wing populism becomes a project of attaining *"firmer foundations when everything is disappearing."* (Paternotte and Kuhar, 2017, p. 14) Hereby the "gender ideology" frame functions ideally as symbolic glue. The interview between von Storch and Kutschera, accounted for in chapter 3.3.1 depicts the overall controversy on gender and gender equality in Germany, which also influences

people's perception of gender projects like the IC, because the feminist ideal of 'gender as a social construction', which Kutschera warns against, is part of the IC's foundation. Furthermore, Kutschera's discourse could potentially be applied to 'bend' the understanding of the IC's intentions when discursive opportunities to discuss the convention arise, which is what has happened in other European countries.

The success of the right-wing populism and its quest for *firmer foundations* might also explain the attacks on gender studies in the German and the Hungarian cases; gender studies typically explore progressive, feminist notions of gender and sex and the researchers within this field also deconstruct traditional, dichotomies related to gender roles and gendered power structures in society, which counteracts the anti-gender actors' project.

In the Danish case, resistance towards the objectives of the IC does not seem to be related to an aversion against its feminist ideals. It might even be too much to categorise the anti-gender discourses in the Danish political debate as 'anti-gender', since the resistance of the feminist ideals is not rooted in a framework of gender equality resistance where desire to retain traditional gender roles prevails. Conversely, the resistance is tied to strategies of realising liberal values through policy discourses. The implementation of the IC, then, presents a discursive opportunity to negotiate those liberal frames that might antagonise the objectives of the IC.

The modesty of the resistance discourse in the Danish case must also be considered in relation to the limitations of the political field's protocols as mentioned above. Since there are no prominent movements or actors in DK that are able to contribute with any significantly influential anti-gender discourses as in the German case, my analysis of the Danish case inevitably conveys more implicit modes of discursive resistance towards the IC and notions of gender. This does not mean that anti-gender actors and discourses comparable to the German and Hungarian ones do not exist in DK; as I accounted for in the analysis of the Danish gender equality frames, radical anti-gender discourses are not uncommon on social media for instance. But due to my data selection criteria – *"I was looking for the strongest oppositional actors and their discursive attempts of resistance to its implementation in order to uncover the strongest points of resistance"* – they are not represented in my analysis because of their less prominent profile in public debates and their limited capacity to influence gender equality policies.

CONCLUSION

Returning to the main question: How are negative responses towards gender equality policies in DK, Hungary, and Germany, respectively, challenging the feminist ideals of the IC and its objectives? This project has established that negative responses operates across different national gender equality frameworks though through different channels and through different combinations of frames. Therefore, it is difficult to accurately assess the severity of the impact that certain anti-gender actors cause in terms of the image of the IC or the acceptance of its ideals and objectives. Nevertheless, my analysis of the three cases does indicate that anti-gender frames are effectively applied in national contexts at all levels of gender equality progression – even in DK, where it is considered part of the national identity. Another finding of this project is the realisation of the struggle that occurs in all three cases over the implementation of the IC and the compromises that it requires. Specifically, my analysis has identified a clash between the IC and national (gender) norms. Of course, one might argue that all conventions, or texts of that governing nature, will potentially clash with national norms. Nevertheless, the feminist ideals of the IC encounter difficulties at multiple levels – both among politicians, civil society movements, and scholars – which can be attributed to the recent rise of right-wing populism in Europe. Thus, the IC faces challenges in managing the tension that occurs in the process of transnational norm translation; i.e. the tension between its own ambitious discourse and national gender norms and structures.

In this project DOS and CFA have contributed to the understanding of the dynamic nature of frames and frame work. This approach has also helped clarify how discursive opportunity structures facilitate and enforce resistance – for instance, the discursive opportunities provided by the rise of right-wing populism combined with the introduction of the IC have allowed anti-gender actors to apply particularly strong combinations of frames by connecting concepts from different but resonant frames. Hereby the anti-gender ideas have potential to infiltrate influential institutions, because they can be represented by resonant frames like anti-immigration frames, which work effectively at 'bending' issues such as VAW.

The significance of this project lies in its demonstration of different discursive strategies of framing applied in the resistance of the IC and its "imposition" on national gender equality policies. My analysis has thus provided an insight into the variety of discourses that might present challenges to the implementation of the IC and the connectedness across these discourses between *"most different cases"* such as DK and Hungary (Agustín and Sata, 2013, p. 60), as well as the case of

Germany which represents a more complex national framework of gender equality given the history of instability and division.

Further research might include more cases, i.e. other European countries. Due to limitations of this project, I was not able to include more than three, but a greater variety of national contexts and responses to the IC would enhance the foundation, laid in this project, for mapping and assessing the character and effect of anti-gender forces across Europe.

REFERENCES

AFP. (2018, October 17). *Hungary's far-right Prime Minister bans gender studies at university because it is 'an ideology not a science'.* Retrieved from dailymail.co.uk: https://www.dailymail.co.uk/news/article-6285345/Hungarys-Prime-Minister-Viktor-Orban-bans-gender-studies-university.html (Accessed May 30, 2019)

Agustín, L. R., & Sata, R. (2013). Gendered Identity Constructions in Political Discourse: The Cases of Denmark and Hungary. In B. Siim, & M. Mokre (Eds.), *Negotiating Gender and Diversity in an Emergent European Public Sphere* (pp. 60-77). Basingstoke: Palgrave Macmillan.

Blum, A. (2015). Germany. In E. Kováts, M. Põim, & (Eds.), *Gender as symbolic glue: The Position and Role of Conservative and Far Right Parties in the Anti-Gender Mobilizations in Europe* (pp. 40-61). Brussels: Foundation for European Progressive Studies.

Borchorst, A., & Dahlerup, D. (2003a). Ligestilling - hvad er problemet? Indledning. In A. Borchorst, & D. Dahlerup, *Ligestillingspolitik som diskurs og praksis* (pp. 9-27). Frederiksberg: Samfundslitteratur.

Borchorst, A., & Dahlerup, D. (2003b). Dansk ligestillingspolitik - diskurs og praksis: Konklusioner. In A. Borchorst, & D. Dahlerup, *Ligestillingspolitik som diskurs og praksis* (pp. 185-204). Frederiksberg: Samfundslitteratur.

Botsch, E. (2015). *The Policy on Gender Equality in Germany: In-depth analysis for the FEMM Committee.* Bruxelles: European Union. Retrieved from http://www.europarl.europa.eu/RegData/etudes/IDAN/2015/510025/IPOL_IDA(2015)5100 25_EN.pdf (Accessed May 30, 2019)

Bryman, A. (2016). *Social Research Methods (5th ed.).* Oxford: Oxford University Press.

bundestag.de. (2017). *Gesetz gegen häusliche Gewalt einstimmig angenommen.* Retrieved from bundestag.de: https://www.bundestag.de/dokumente/textarchiv/2017/kw22-de-haeusliche-gewalt-507528 (Accessed May 30, 2019)

CoE. (2010). *Working towards a convention on preventing and combating violence against women and domestic violence.* Retrieved from humanrights.ch:

https://www.humanrights.ch/cms/upload/pdf/151103_flyer_cahvio_en.pdf (Accessed May 30, 2019)

CoE. (2019a). *Who We Are*. Retrieved from coe.int: https://www.coe.int/en/web/about-us/who-we-are (Accessed May 30, 2019)

CoE. (2019b). *Historical background*. Retrieved from coe.int: https://www.coe.int/en/web/istanbul-convention/historical-background (Accessed May 30, 2019)

CoE. (2019c). *Chart of signatures and ratifications of Treaty 210*. Retrieved from coe.int: https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/210/signatures (Accessed May 30, 2019)

Council of Europe Communications. (2017, November 24). *Directorate of Communications*. Retrieved from coe.int: https://search.coe.int/directorate_of_communications/Pages/result_details.aspx?ObjectId=09000016807671d0 (Accessed May 30, 2019)

Dahlerup, D. (2018). Gender Equality as a Closed Case: A Survey among the Members of the 2015 Danish Parliament. *Scandinavian Political Studies*, 41(2),188-209.

Der Deutsche Frauenrat. (2017, November 23). *ISTANBUL-KONVENTION OHNE VORBEHALT UMSETZEN*. Retrieved from frauenrat.de: https://www.frauenrat.de/istanbul-konvention-ohne-vorbehalt-umsetzen/ (Accessed May 30, 2019)

Der Deutsche Frauenrat. (2017, June 25). *EINRICHTUNG EINER NATIONALEN KOORDINIERUNGSSTELLE ZUR VOLLSTÄNDIGEN UMSETZUNG UND EINHALTUNG DER ISTANBUL-KONVENTION SOWIE EINER UNABHÄNGIGEN MONITORINGSTELLE*. Retrieved from frauenrat.de: https://www.frauenrat.de/einrichtung-einer-nationalen-koordinierungsstelle-zur-vollstaendigen-umsetzung-und-einhaltung-der-istanbul-konvention-sowie-einer-unabhaengigen-monitoringstelle/ (Accessed May 30, 2019)

FRA. (2014). *Violence against Women: An EU-Wide Survey*. Luxembourg: Publications Office of the European Union.

Ferree, M. M. (2009). Inequality, Intersectionality and the politics of discourse: Framing feminist alliances. In E. Lombardo, P. Meier, & M. Verloo (Eds.), *The Discursive Politics of Gender Equality: Stretching, bending and policymaking* (pp. 86-104). London: Routledge.

FRA. (2017). *Challenges to women's human rights in the EU*. Retrieved from europa.eu: https://fra.europa.eu/en/publication/2017/colloq-womens-rights (Accessed May 30, 2019)

Freedom House. (2019). *Hungary*. Retrieved from freedomhouse.org: https://freedomhouse.org/report/freedom-world/2019/hungary (Accessed May 30, 2019)

ft.dk. (2013, May 24). *B 120 Forslag til folketingsbeslutning om at underskrive og ratificere Europarådets konvention om vold mod kvinder*. Retrieved from ft.dk: https://www.ft.dk/samling/20121/beslutningsforslag/b120/beh1-102/forhandling.htm (Accessed May 30, 2019)

hungarianspectrum.org. (2017, February 18). *It Has Taken Three Years but the Istanbul Convention Will Soon Be Ratified*. Retrieved from hungarianspectrum.org: http://hungarianspectrum.org/tag/istanbul-convention/ (Accessed May 30, 2019)

hungarianspectrum.org. (2018, September 15). *Fidesz and Women's Issues in the European Parliament*. Retrieved from hungarianspectrum.org: http://hungarianspectrum.org/2018/09/15/fidesz-and-womens-issues-in-the-european-parliament/ (Accessed May 30, 2019)

Kirchner, S., & Noack, R. (2016, July 7). *New stricter sexual-assault laws in Germany are making refugee activists uneasy*. Retrieved from washingtonpost.com: https://www.washingtonpost.com/news/worldviews/wp/2016/07/07/why-stricter-sexual-assault-laws-in-germany-make-refugee-activists-uneasy/?noredirect=on&utm_term=.2fa6549c22d8 (Accessed May 30, 2019)

Kováts, E., & Põim , M. (2015). *Gender as symbolic glue: The Position and Role of Conservative and Far Right Parties in the Anti-Gender Mobilizations in Europe* . Brussels: Foundation for European Progressive Studies.

Kovátz, E., & Pető, A. (2017). Anti-gender discourse in Hungary: A discourse without a movement? In R. Kuhar, & D. Paternotte (Eds.), *Anti-Gender Campaigns in Europe: Mobilizing Against Equality* (pp. 117-131). London: Rowman & Littlefield.

Krizsán, A., & Popa, R. (2018). Contesting Gender Equality in Domestic-Violence Policy Debates: Comparing Three Countries in Central and Eastern Europe. In M. Verloo (Ed.), *Varieties of Opposition to Gender Equality in Europe* (pp. 98-116). London: Routledge.

Lombardo, E., & Meier, P. (2009). Stretching, bending and inconsistency in policy frames on gender equality: Discursive windows of opportunity. In E. Lombardo, P. Meier, & M. Verloo (Eds.), *The Discursive Politics of Gender Equality: Stretching, bending and policymaking* (pp. 138-152). London: Routledge.

Lombardo, E., Meier, P., & Verloo, M. (2009). Stretching and bending gender equality: A discursive politics approach. In E. Lombardo, P. Meier, & M. Verloo (Eds.), *The Discursive Politics of Gender Equality: Stretching, bending and policymaking* (pp. 1-18). London: Routledge.

Meret, S., & Siim, B. (2013). Gender, Populism and Politics of Belonging: Discourses of Right-Wing Populist Parties in Denmark, Norway and Austria. In B. Siim, & M. Mokre (Eds.), *Negotiating Gender and Diversity in an Emergent European Public Sphere* (pp. 78-96). Basingstoke: Palgrave Macmillan.

Noack, R. (2016, January 6). *Sexual assaults challenge Germany's welcoming attitude toward refugees*. Retrieved from washingtonpost.com: https://www.washingtonpost.com/news/worldviews/wp/2016/01/06/sexual-assaults-challenge-germanys-welcoming-attitude-toward-refugees/?utm_term=.59fc4fd05598 (Accessed May 30, 2019)

Oppenheim, M. (2018, October 24). *Hungarian Prime Minister Viktor Orban bans gender studies programmes*. Retrieved from independent.co.uk: https://www.independent.co.uk/news/world/europe/hungary-bans-gender-studies-programmes-viktor-orban-central-european-university-budapest-a8599796.html (Accessed May 30, 2019)

Paternotte, D., & Kuhar, R. (2017). "Gender ideology" in movement: Introduction. In R. Kuhar, & D. Paternotte (Eds.), *Anti-Gender Campaigns in Europe: Mobilizing Against Equality* (pp. 1-22). London: Rowman & Littlefield.

Pető, A. (2017, April 10). *Report from the trenches: The debate around teaching gender studies in Hungary*. Retrieved from boell.de: https://www.boell.de/en/2017/04/10/report-trenches-debate-around-teaching-gender-studies-hungary (Accessed May 30, 2019)

Pivarnyik, B. (2018, July 4). *Family and Gender in Orbán's Hungary*. Retrieved from boell.de: https://www.boell.de/en/2018/07/04/family-and-gender-viktor-orbans-hungary (Accessed May 30, 2019)

Popa, R. M. (2011, April 11). *Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence.* Retrieved from scribd.com: https://www.scribd.com/document/103784831/Raluca-Popa-QUINGLancaster-Apri2011 (Accessed May 30, 2019)

Roggeband, C., & Verloo, M. (2007). Dutch Women are Liberated, Migrant Women are a Problem: The Evolution of Policy Frames on Gender and Migration in the Netherlands, 1995–2005. *Social Policy & Administration*, 41(3), 271-288.

Spike, J. (2017, November 28). *Orbán: preventing migration is the best way to combat violence against women*. Retrieved from budapestbeacon.com: https://budapestbeacon.com/orban-preventing-migration-best-way-combat-violence-women/ (Accessed May 30, 2019)

thehungaryjournal.com. (2017, November 26). *Socialists, LMP urge promulgation of Istanbul Convention*. Retrieved from thehungaryjournal.com: https://thehungaryjournal.com/2017/11/26/socialists-lmp-urge-promulgation-of-istanbul-convention/ (Accessed May 30, 2019)

Turp, C. (2019, February 12). *Council of Europe: Hungary faces human rights challenges*. Retrieved from emerging-europe.com: https://emerging-europe.com/news/council-of-europe-hungary-faces-human-rights-challenges/ (Accessed May 30, 2019)

Verloo, M. (2018). Introduction: Dynamics of Opposition to Gender+ Equality in Europe. In V. Mieke (Ed.), *Varieties of Opposition to Gender Equality in Europe* (pp. 3-18). London: Routledge.

Villa, P.-I. (2017). "Anti-genderismus": German angst? In R. Kuhar, & D. Paternotte (Eds.), *Anti-Gender Campaigns in Europe: Mobilizing Against Equality* (pp. 99-116). London: Rowman & Littlefield International.

Walker, S. (2018, December 21). *'We won't keep quiet again': The women taking on Viktor Orbán*. Retrieved from theguardian.com: https://www.theguardian.com/world/2018/dec/21/hungary-female-politicians-viktor-orban (Accessed May 30, 2019)

Weber, B. (2016). The German Refugee "Crisis" after Cologne: The Race of Refugee Rights. *English Language Notes*, 54(2), 77-92.

womenlobby.org. (2016, July 13). *NO means NO – Germany takes big legal step against Violence against women*. Retrieved from womenlobby.org: https://www.womenlobby.org/NO-means-NO-Germany-takes-big-legal-step-against-Violence-against-women?lang=en (Accessed May 30, 2019)

World Health Organization. (2019). *The World Health Assembly endorses the global plan of action on violence against women and girls, and also against children*. Retrieved from who.int: http://www.who.int/reproductivehealth/topics/violence/action-plan-endorsement/en/ (Accessed May 30, 2019)

zivilekoalition.de. (2018, August 5). *»Wer die Familie zerstört, der zerstört alles«*. Retrieved from zivilekoalition.de: https://www.zivilekoalition.de/chronik/artikel/?tx_ttnews%5Btt_news%5D=783&cHash=98844e80a9284b187617ae25a0f5ed05 (Accessed May 30, 2019)

Zuleta, L., Burkal, R., & Thomsen, T. B. (2017). *Hadefulde Ytringer i den Offentlige Debat*. København: Institut for Menneskerettigheder.