“Barack Obama, back off!”

Framing strategies and postcolonial discourse in debating Uganda’s Anti-Homosexuality Bill

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Introduction

In recent years, Uganda has been at the centre of international attention because its Parliament is discussing the Anti-Homosexuality Bill. Drafted in 2009 by Member of Parliament David Bahati, the bill aims at “strengthening the nation’s capacity to deal with emerging internal and external threats to the traditional heterosexual family” and to “protect the cherished culture of the people of Uganda against the attempts of sexual rights activists seeking to impose their values of sexual promiscuity” (Anti-Homosexuality Bill, 2009). While same-sex behavior was already criminalized under British colonial rule, the current bill goes further in that it proposes the death penalty for people who commit ‘the offence of aggravated homosexuality’, which includes sex with a minor and sex with a person who is disabled. The proposed new legislation also seeks to criminalize the “promotion of homosexuality”, which would make the work of national and international activists and organizations in the field of sexual rights in Uganda more difficult. In addition, the bill proposes to nullify international treaties, protocols and declarations that recognize sexual rights.

The Anti-Homosexuality Bill caused a moral outrage among Western NGOs and governments, who condemned the legislation as a violation of human rights. President Obama criticized the Anti-Homosexuality Bill as ‘odious’, while human rights organizations such as Human Rights Watch and Amnesty International called upon the Ugandan government to reject the bill. When the Parliament dissolved in May 2011, the bill was temporarily off the table, but it was re-introduced by Bahati in February 2012. An Amnesty International representative said that “it is deeply alarming that the Ugandan parliament is again considering this appalling bill, which flies in the face of human decency and violates international human rights law.” A number of Western governments, including Germany, United Kingdom and Sweden, have threatened to hold back development aid if Uganda does not withdraw its proposed legislation.

The current international debate on Uganda’s Anti-Homosexuality Bill reflects a larger trend of political homophobia in Sub-Saharan Africa and a Western concern with it. A number of

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1 The current law states that any person who has “carnal knowledge of any person against the order of nature” commits an offence and is liable to imprisonment for life (Penal Code Act retrieved from http://www.publicservice.go.ug/public/The%20Penal%20Code%20Act%20120.pdf)
2 “Obama condemns anti-gay bill as ‘odious’.” http://news.bbc.co.uk/2/hi/afrika/8498836.stm
African leaders see homosexuality as a Western disease that is alien to traditional African culture. Zimbabwe’s president Robert Mugabe has stated that homosexuals are “worse than pigs and dogs” and that therefore they do not deserve any rights at all. At a meeting where traditional leaders gathered, Mugabe said that “we are against this homosexuality and we as chiefs should fight against such Western practices and respect our culture” (Human Rights Watch, 2003: 29). In Zambia, a government spokesman proclaimed in 1998 that it was “un-African and an abomination to society which would cause moral decay”. The Zambian vice-president warned that “if anybody promotes gay rights after this statement the law will take its course. We need to protect public morality” (Human Rights Watch, 2003: 39). Nigeria’s President Olusegun Obasanjo said in 2004 that homosexual practices were “clearly un-Biblical, unnatural, and definitely un-African.” Sam Nujoma, President of Namibia, announced a purge of homosexuals, stating that “the Republic of Namibia does not allow homosexuality or lesbianism here. Police are ordered to arrest you, deport you and imprison you.” South Africa presents a unique case since it was the first and only country in the world that explicitly incorporated the rights of gays and lesbians into its constitution by prohibiting, among others, discrimination on the basis of sexual orientation, although president Zuma has recently stated that same-sex marriages were “a disgrace to the nation and to God” (Gunkel, 2010).

In this study, I am interested in the question how an international norm on lesbian, gay, bisexual and transgender rights (hereafter: LGBT rights) is negotiated among different actors in Uganda and Western countries. International norms can be defined as “ideas of varying degrees of abstraction and specification with respect to fundamental values, organizing principles or standardized procedures that resonate across many states and global actors, having gained support in multiple forums including official policies, laws, treaties or agreements” (Wiener, 2009, cited in Krook and True, 2010: 103-104). Examples of norms that have changed the behavior of states and international organizations are diverse, and include regulations with regard to domestic policies (e.g. suffrage, human rights, democracy), and norms intended to guide inter-state relations (e.g. trade agreements, humanitarian intervention, and global public goods) (Wiener, 2009). An international norm on LGBT rights does not exist, but sexual rights activists have increasingly attempted to decriminalize homosexuality worldwide and to include sexual and reproductive rights into the human rights language. The most notable step in that direction are the Yogyakarta Principles (2007). Based on the premise that “all people are born in free and
equal in dignity and rights”, the Yogyakarta Principles were developed to apply international human rights law to violations based on sexual orientation and gender identity. The 29 principles include, among others, the right to equality and non-discrimination, the right to privacy, the right to found a family, and the right to freedom of assembly. Although the aim is to “bring greater clarity and coherence to States’ human rights obligations” (2007: 5), there is no binding agreement that commits states to comply with an international norm on LGBT rights. The fact that it has become a key focus and a struggle in international relations nevertheless suggests that we are currently witnessing the emergence of an international norm on LGBT rights.

Scholars in the field of international relations have increasingly engaged with the questions how norms develop, how they gain meaning in different contexts, and which actors promote and translate them. A first wave of scholarship sees norm diffusion as a set of “causal mechanisms and processes by which ideas spread” (Finnemore and Sikkink 1998: 4). Implicitly, it is assumed that norms have an international source. Once established by norm entrepreneurs, international or ‘global’ norms are assumed to trickle down to domestic settings where they are adopted, or fail to be adopted, by norm followers. A central role is attributed to the ‘persuasive capabilities’ of transnational advocacy networks. According to this perceptive, the broad acceptance of a new norm crucially depends on the capabilities of transnational advocacy networks to frame norms in ways that will put pressure on norm-violating states to act (Tarrow, 2006; Kekkink and Sikkink, 1998). Recent work however suggests that such a top-down view is problematic, because it leaves the domestic creation and appropriation of norms underestimated. Instead, it is argued that norm creation and appropriation are ongoing processes of negotiation, in which various actors from different contexts are involved (Zwingel, 2012). Acharya (2004) observes that international norms do not land in a vacuum, but that these places are themselves inhabited by existing norms. Acharya argues that rather than remaining passive targets and learners of transnational norms, local actors actively engage in the norm diffusion process by borrowing and modifying these norms in accordance with their existing beliefs and practices. This process of congruence building, Acharya maintains, will influence the degree of acceptance towards the norm.

The literature discussed so far has centered much of its attention on the positive aspects of norm negotiations. Keck and Sikkink (1998) for example, see transnational advocacy networks as concrete motors of change that have considerable influence on states by using their
persuasive capabilities. Although recent scholarship has emphasized the importance of local dynamics, the focus has remained on understanding how actors build ‘congruence’ between global and domestic norms in order to bring both sets in accordance (Acharya, 2004). The current debate on Uganda’s Anti-Homosexuality Bill raises new questions with regard to these assumptions. More specifically, they do not inform us about the influence of power and dominance on norm negotiations. Implicitly, it is assumed that norm negotiations are power-free. However, it has been pointed out that the hegemonic position of the North in the world gives it an ability to set the agenda and to determine the priority of social problems (Arnfred, 2004). A number of non-Western feminists have drawn attention to the fact that so-called global norms are predominantly influenced by Western values, and have criticized the human rights framework for not taking into account local experiences of women and context-specific forms of gender inequality (e.g. Mohanty, 2003; Grewal, 1999). According to Zwingel (2005), this mismatch between international norms and local realities is a result of the hegemonic character of norm creation processes, from which most of the voices in the world are excluded. Reactions of local actors towards international norms might then not only concern their definition, but also their hegemonic tendencies. As a result, norm negotiations do not necessarily involve processes of congruence building, but alternative, negative, possibilities also exist. The influence of such postcolonial dynamics on the outcome of norm negotiations has not been well articulated in the norm diffusion thinking.

This study investigates the framing strategies by which an international norm on LGBT rights is negotiated among different actors in Uganda and Western countries, and how these strategies are embedded in postcolonial discourses. It starts from the notion that norm diffusion can be seen as an open process of negotiation in which various actors from different contexts are involved. From this multi-actor perspective, I will go one step further by considering the postcolonial power dynamics in these negotiations. It is important to point out that it is uncertain if LGBT rights will become accepted as an international standard. The aim of this research is nevertheless not to predict the outcome of these negotiations, but rather to investigate how framing strategies apply to postcolonial settings. The central research question is: which framing strategies are used in the international debate revolving Uganda’s Anti-Homosexuality Bill, and how are these strategies embedded in postcolonial discourses?
The current debate on Uganda’s Anti-Homosexuality Bill was selected as a critical case for understanding these dynamics because of two reasons. First of all, the unique historical relationship and current North-South relationship between Uganda and the West is potentially crucial for understanding the current debate on Uganda’s Anti-Homosexuality Bill. Despite gaining formal independence in the 1960s, some of Uganda’s domestic policies are still influenced by Western powers, which could cause political tensions. By threatening to cut foreign aid if Uganda does not withdraw its proposed anti-gay legislation, a number of Western powers are exerting pressure on Uganda to accept gay rights. The support among some Ugandans for the Anti-Homosexuality Bill may therefore also be seen as an attempt to voice resistance to Western hegemony by searching for independence from foreign influence (Oinas, 2011). Secondly, the current debate on LGBT rights is by definition a postcolonial subject. Although Africa and Africans are often accused of homophobia by Western outsiders, the ironic truth is that the anti-homosexuality laws that exist in much of Africa and elsewhere in the world are a legacy of the colonial era. Inspired by Victorian morals, 19th century colonialists introduced these laws as a part of the civilizing mission on the ‘dark continent’ (Epprecht, 2008). In recent years however, homoerotic desire has increasingly become associated with sexual democracy and freedoms in the West (Puar, 2007; Gunkel and Pitcher, 2008). The battle for gay and lesbians rights has its origins in the West and has recently shifted to the African continent. Uganda can therefore be seen as a site where a transnational struggle over the acceptance of LGBT rights is played out.

However, even when a postcolonial analysis is employed, it is important not to get caught in a war of binary oppositions of a pro-homosexual West versus an anti-homosexual Africa. A number of postcolonial scholars have pointed out that the Western interest in Uganda’s Anti-Homosexuality Bill has frequently led to the view that Africa is inherently homophobic by reducing Africans to religious stereotypes and by suggesting that African homosexuals are always victims (Tamale, 2011b; Oinas, 2011). At the same time, the West is constructed as inherently liberal, modern, progressive and tolerant. But also academic writings have frequently been characterized by ethnocentrism, whereby “African cultural and sexualities were always framed as different, less urbane and inferior to those of the West” (Tamale, 2011a: 19). Edward Said (1979) has argued that such representations reimpose colonial domination, through suggesting that Western values, beliefs and forms of culture are superior to the inherently
negative ‘traits’ of these cultures. The researcher obviously has a lot of power in that he or she represents research subjects and creates knowledge about the research topic. This study therefore aims to challenge these racist stereotypes and to provide a different reading of the debate. A necessary step is therefore to go beyond dichotomous thinking by identifying the plurality of actors and their voices within the public debate.

This thesis is organized as follows. In Chapter 1, I present the theoretical framework, which combines insight from norm diffusion literature, postcolonial theory and sexuality studies. It also gives an historical overview of transnational sexual rights activism by highlighting the most important international human rights documents that address issues of sexual rights and gender identity. Chapter 2 discusses the analytical framework, which consists of critical frame analysis and discourse analysis. Chapter 3 provides more information on how this study was conducted. Central importance is given to reflexivity and the processes of data collection and analysis. Chapters 4 to 6 constitute the empirical part of this thesis. In Chapter 4, I reconstructed a timeline of events in order to track the mobilization of different frames between 2009 and 2012. This timeline reveals that two important dynamics play a role in the process of norm creation, which shape the content of Chapters 5 and 6. Chapter 5 focuses on the first dynamic, which I call ‘polarization’. Polarization is used to refer to processes by which the debate is represented as a dichotomy between the West and Uganda. I show that framing strategies do not necessarily lead to congruence and complementary, but that these strategies may also lead to increased differences between actors. In Chapter 6, I turn to the second dynamic of norm creation, which I call ‘pluralization’. I will show that fixing the debate into two opposite camps also creates room for negotiating these categories. The analysis suggests that norms are dynamic and that actors constantly reposition themselves on a continuum. The concept ‘frame alignment strategies’ (Snow et al., 1986) is insufficient to explain these dynamics. Finally, Chapter 7 summarizes the main conclusions of this research and discusses the main contributions of this study to the academic literature.
1. Theoretical Framework

Norm diffusion

The development of international norms and their diverse impact on the behavior of actors in international politics have become key questions in International Relations scholarship. Broadly speaking, two theoretical perspectives can be distinguished. The constructivist perspective deals with the question under what circumstances international norms emerge, and which actors translate and promote them. Although the constructivist framework has shed light on a number of important issues, its shortcoming is that it leaves domestic dynamics of norm creation and appropriation underestimated (Zwingel, 2012). A second body of literature sees norm creation and appropriation as open processes of negotiation in which various actors from different contexts are involved. I will deal with each in turn.

A first wave of scholarship in norm diffusion thinking has focused much attention on the “causal mechanisms and processes by which ideas spread” (Finnemore and Sikkink, 1998: 4). Inspired by constructivism, the literature generally sees norms as “standards of appropriate behavior for actors with a given identity” (ibid: 4). Norms are thus conceived of as fairly static things that can be taught, learned, or internationalized by more or less fixed actors. In order to explain the travelling of international norms, a number of models were developed that comprise different phases from the emergence of a norm to the recognition, diffusion, and internalization. For example, the influential ‘life cycle model’ proposed by Finnemore & Sikkink (1998) identifies three stages by which norms are spread and ultimately internalized by others. The first stage is called ‘norm emergence’, which is characterized by the persuasion of norm entrepreneurs to embrace new norms. The second stage is referred to as ‘norm cascade’, which involves broad norm acceptance of followers who wish to imitate the norm leaders. The final stage is called ‘norm internalization’. In this stage, the new norm is no longer a contested or publicly debated issue, but is now taken for granted. The authors point to the importance of a threshold or ‘tipping point’ after the first stage. That is, a critical mass has to adopt the new norm in order to move to the second stage. The authors maintain that the proposed “life cycle” is by no means inevitable, since many norms fail to reach a critical mass and subsequently fail to become internalized by a majority.
Although the state is considered as the most important actor in implementing norms in the domestic context, non-governmental actors are also seen as influential players in pushing the norm forward. Despite their limited material and financial resources, transnational advocacy networks are deemed to have considerable influence on more powerful actors by using their “persuasive capabilities” (Sikkink, 2002). To transmit a norm, domestic NGOs would therefore benefit from building coalitions with transnational allies. Risse and Sikkink (1999) argue that:

[...] the diffusion of international norms in the human rights area crucially depends on the establishment and the sustainability of networks among domestic and transnational actors who manage to link up with international regimes, to alert Western public opinion and Western governments (Risse and Sikkink, 1999:5).

Keck and Sikkink (1998) see transnational advocacy networks as concrete motors of normative change. In their influential boomerang–model, the authors propose that in cases where state actors are not responsive to claims by social movements, domestic groups are able to connect to transnational actors in order to put pressure on their states. The most effective weapon is to create credible information and to frame issues in a way that puts pressure on reluctant governments to act (Zwingel, 2012). This can most successfully be achieved through campaigns that target concrete problems, and if it is unambiguous who bears responsibility for the problem. Put formally, the externalization of claims and the formation of transnational allies are seen as decisive factors in the success or failure of an international norm. Although there is a growing recognition that the circumstances under which TANs operate play a role, there appears to be a general consensus that building ‘winning coalitions’ with states and international organizations is vital for the creation of an international norm (Tarrow, 2006).

A recent wave of scholarship has shifted away from this dominant approach, arguing that such a conceptualization leaves domestic processes of norm creation and appropriation underestimated (Zwingel, 2012). Instead of seeing norm diffusion as a top-down process, these scholars contend that norm creation and diffusion are open processes of negotiation in which various actors from different contexts are involved. The reason is that norms tend to be vague and imprecise, which enables them to be subjected to a variety of contexts and hence to be used for different purposes. Krook and True (2010) therefore see norms not as ‘finished products’ that travel from one place to another, but as ongoing processes that continue to develop after they
emerge. They identify two mechanisms that help explaining why norms change over time. On the one hand, norms change as a result from debates over their internal definition. The fact that norms can encompass different meanings may give rise to conflicts over definitions that lead to revisions of existing norms or the emergence of new norms. For instance, while human rights has been recognized as a core international norm since at least 1948, the meaning of human rights has later been challenged to encompass women’s rights, and access to drinking water and essential medicines, among others (Krook and True, 2010). On the other hand, norms may change as a result from their interaction with the external normative environment. This external environment consists of norms which are themselves ‘work in progress’. Recent work suggests that norms are more likely to resonate when they are associated with other widely accepted normative ideas (Carpenter, 2007). Joachim (2003) for example observes how activists in the 1980s framed violence against woman as an obstacle to equality and peace, whereas in the 1990s it became more closely linked to human rights as they grew in importance at the international level. Krook and True (2010) note that the distinction between ‘internal’ and ‘external’ should not be drawn too sharply, but that it can be used as an analytical tool to analyze two related sets of dynamics that interact and intersect.

Because norms are dynamic, evolving and ambiguous, it is problematic to see norm diffusion as a set of clearly defined trajectories, whether top-down (global to local) or bottom-up (NGOs to states). The distinction between norm-abiding states versus norm-violating states that need to be socialized into desired behavior is moreover questionable. Instead, it is more appropriate to conceive of norm creation and diffusion as open processes of negotiation to which various actors, if to varying degrees, contribute. Tripp (in Ferree and Tripp, 2006) for example shows that transnational women’s activism did not originate from the West, but that women’s movements from the South have had a profound influence on the creation of international women’s rights. Tripp argues that global networks are more and more led by African, Asian and Latin American women, and even though much of their funding comes from the North, the perspectives and priorities on women’s rights they offer are their own. Acharya (2004) observes that international norms do not land in a vacuum, but that these places are themselves inhabited by existing norms that influence the degree of acceptance towards the norm. Acharya argues that rather than remaining passive targets and learners of transnational norms, local actors actively engage in the norm diffusion process by borrowing and modifying these norms in accordance
with their existing beliefs and practices. This process of congruence building between international and domestic norms, Acharya maintains, will influence the degree of resonance, acceptance and resistance towards external norms.

The literature discussed so far has centered much of its attention on the positive dimensions of norm negotiations. Keck and Sikkink (1998) for example, see transnational advocacy networks as concrete motors of change that have considerable influence on states by using their persuasive capabilities. Although recent scholarship has emphasized the importance of local dynamics, the focus has remained on understanding how actors build ‘congruence’ between global and domestic norms in order to bring both sets in accordance. As the same time, little attention has been given to ‘negative’ instances of norm negotiations. In this study, I want to shift the focus from congruence building to more problematic norm negotiations. Following Zwingel (2012), I see norm creation as open processes of negotiation in which various actors from different contexts are involved. From this perspective, I argue that this open process of negotiation does not necessarily involve congruence building between actors, but that alternative outcomes are also possible. To understand why, we need to take a closer look at the power relations that play a role in international norm negotiations.

Postcolonialism

In order to grasp the power dynamics in the process of norm creation, this study links norm diffusion literature to postcolonial thinking. Postcolonialism is not a conventional theory in the traditional academic sense of the word, but can be seen as a set of ideas and problematizations that are of particular relevance to the study of African social and political affairs (Abrahamsen, 2003). It starts from the notion that although colonialism, as defined by formal settlements and the control over other people’s land, is in the main over, many of its structures and power relations are still in place. Consequently, Spivak argues that “we live in a post-colonial neo-colonized world” (1990: 166). The ‘post’ in postcolonialism is therefore not intended to mark the end of the colonial era, but must rather be seen as an indication of the continuity of a global system of hegemonic power. It regards the colonial experience and current North-South relationships as crucial to the understanding of contemporary politics.

Central to the understanding of postcolonial theory is that it views power as productive of identities and subjectivities. Michel Foucault is commonly associated with this redefinition of
power. He argues that knowledge is not objective, but dependent upon power relations that have already defined a particular topic as a legitimate object of study. The sciences then do not merely describe the world as they find it, but instead construct it and create the manner in which it is perceived and understood (Abrahamsen, 2003). It follows that postcolonial scholars do not accept at face value any particular categorization of the world, but that they seek to establish “how certain ways of understanding and representing the world became dominant and acquired the position to shape the manner in which a particular aspect of social reality is imagined and acted upon” (Abrahamsen, 2003: 199). One of the most influential postcolonial writers is Edward Said, who provides a thorough analysis of the stereotypes and colonial assumptions that are inherent in Western representations of the formerly colonized nations. In ‘Orientalism’ (1979) he argues that the Orient has been represented as the binary opposite of the West. These representations construct the Orient as traditional, savage and underdeveloped and the West as modern, rational and developed. Said argues that such representations of the Self and the Other reimpose colonial domination, through suggesting that Western values, beliefs and forms of culture are superior to the inherently negative ‘traits’ of these cultures.

A good place to start searching for Orientalist representations is in academic writing on African sexualities. Often heavily influenced by the HIV/AIDS pandemic, this scholarship has long been dominated by European perceptions that African sexuality is dangerous, promiscuous and exotic, in short, as ‘other’ than Western sexuality. This ‘Othering’ not only serves to construct African sexuality as different from the self, but also to co-construct Western sexuality as modern, rational, and civilized (Arnfred, 2004). A frequently cited example of such an essentialist study of African sexuality was undertaken by Caldwell et al. (1989) who sought to analyze the social context of AIDS in Sub-Saharan Africa. The authors developed a theory that Africa has a distinct and internally coherent sexual system that stands in contrast to the so-called Eurasian system. The African system, the authors maintain, is inherently permissive and lacks moral limitations, and as such it will be “vulnerable to attack by all coital-related disorders” (p. 187). The Caldwell-thesis has generated substantial critique. A number of authors state that their claim about African sexual permissiveness lacks empirical evidence (Stillwagon, 2003; Heald, 1995). A much more serious concern however, is that their study is profoundly racist and Eurocentric, and replicates much of the prejudices that exist on African sexuality. Although the Caldwells themselves refer to the pitfalls of projecting Western prejudices on African sexualities,
they seem to fall precisely into this trap (Heald, 1995: 490). Signe Arnfred suggests that rather than introducing something new, the authors revitalized age-old images that are fueled by sexual anxieties and fears. “It’s all there”, she continues, “the unbridled black female sexuality, excessive, threatening and contagious, carrying a deadly disease.” (Arnfred, 2004: 67).

Stereotypical beliefs can also be traced in Western understandings of homosexuality in Africa. The Western interest in Uganda’s Anti-Homosexuality Bill has frequently led to the view that Africa is inherently dangerous and inhospitable to gays. A number of scholars have pointed out that Western mass media have scandalized African incidents of homophobia by reducing Africans to religious and homophobic stereotypes and by portraying the West as liberal and tolerant (Oinas, 2011; Tamale, 2011b). Currier (2011) shows that some documentaries and newspaper articles perpetuate the construction of African nations as dangerous and inhospitable to sexual minorities through suggesting that LGBTs are always victims. For example, in the documentary Dangerous Living: Coming Out in the Developing World, Namibia is constructed as a violent, backward nation in which it is impossible for gays and lesbians to live with dignity (Currier, 2011). Homophobia is thus framed as a feature of ‘other cultures’, while the West is represented as inherently liberal and tolerant towards gay people (see also Puar, 2008; Gunkel and Pitcher, 2009; Oinas, 2011). Such representations are overly simplistic, since not all Africans are homophobic, and violence towards gays and lesbians also exist in Western countries. Not only is Africa constructed as inherently different from the West, there is at the same time a hierarchy created through the deployment of negative words and racist stereotypes. As such, the supremacy of Western civilization is legitimized.

Whereas Orientalism is used to describe the process of stereotyping people in the Third World, Occidentalism can be said to be its counterpart, and refers to misconceptions and stereotypes of the West held by people from other continents. These stereotypes are often grounded in ideas that capitalism, liberalism and secularism are destructive forces to society (Buruma and Margalit, 2004). For example, AIDS is sometimes locally understood by Africans as the result of modernization processes, such as rapid urbanization and educational expansion, that destroyed the moral fiber of society. Occidentalisim is also visible in the kind of rhetoric used by African leaders when they state that homosexuality is ‘a Western disease’ that is ‘alien to African culture’ and ‘dangerous to African families’. These assertions are often used to voice resistance to Western hegemony, by searching for national pride and independence from foreign
influence (Christiansen, 2009). Franz Fanon (cited in Oinas, 2011) has shown that these anti-imperialist struggles often end up in old binaries and do not thoroughly challenge the old hegemonic power relations if they substitute imperial power with local patriarchal power. Phillips (2003) argues that “to suggest that homosexual acts are against ‘African culture’ is to represent Africa as statically monocultural, to ignore the richness of differing cultural constructions of desire, and in suggesting such a totalized notion of African culture, one simply replicates much of the colonial discourse on African sexuality” (Philips, 2003:164). When debating local understandings of sexual rights, what is needed is not a choice between ‘Western’ or ‘local’ understanding of rights, but a search for new openings (Oinas, 2011). According to Oinas, the crucial question becomes one of granting space in which people can “work through, clarify, struggle, and debate personal and shared understandings of norms and ideals” (2011: 8).

**A history of homosexuality in the West**

In order to apprehend the current debate on homosexuality and human rights, it is necessary to give a historical overview of sexuality thinking in the West. The idea that gay rights are human rights is a recent one and hence by no means self-evident. Those who argue that LGBT are a priority in international relations should therefore ask themselves how and why certain ways of thinking about sexuality have become dominant. Most of contemporary Western understandings of sexuality can be traced back to the nineteenth century (Rubin, 1984). Strongly influenced by Biblical notions of sinfulness, the Victorian crusaders targeted different kinds of perceived immoral behaviors, including masturbation, prostitution, non-reproductive sex, and same-sex relationships. These ideas were consolidated into laws that criminalized these ‘bad’ sexual behaviors, the most notable being sodomy laws. These laws penalized same-sex acts with harsh sentences, varying from forced labor to life imprisonment or death. Laws criminalizing same-sex behavior have existed in the West until very recently and still exist in large parts of the world (see ILGA 2011 for a world survey of laws criminalizing same-sex behavior). While the laws have disappeared in Western societies, the ideas that brought them forth have left a deep imprint in our attitudes and anxieties about sexuality.

The emergence of psychology as a scientific discipline in the early twentieth century resulted in a shift from notions of sin and crime to concepts of sickness and mental illness in Western thinking about sexuality. Homosexual behavior was increasingly seen as a pathological
condition that obscured an individual’s immaturity and a variety of mental problems (Rubin, 1984). This medicalization of homosexuality was a significant transition, although psychologists disagreed on whether it was congenital or acquired, and whether it was ineradicable or susceptible to cure (Weeks, 1981). The old notions of sinfulness of homosexuality did not disappear, however. Instead, they became inextricably linked with ‘scientific’ theories. In the third edition of the Diagnostic and Statistical Manual of Mental Disorders (DSM-III, published in 1980) of the American Psychiatric Association, homosexuality was removed from the list of mental disorders, but it wasn’t until 1990 that the World Health Organization followed suit.

Gayle Rubin (1984) introduces the concept of a sexual hierarchy as an analytic tool for understanding how a culture evaluates sexual behavior and expressions. She argues that sexual hierarchical values act as social differentiating mechanisms that show similarities with racism and nationalism because they privilege some and exclude others. They invoke concepts of superiority for dominant groups, while rendering those who practice ‘abnormal’ sexual behaviors inferior. In Europe and the United States, sexual hierarchical values are usually grounded in notions of sin and crime or in psychiatric notions of mental and emotional inferiority, whereby marital, reproductive heterosexuals are at the top of the pyramid, whereas unmarried, non-reproductive, homosexual and other forms of ‘deviant’ sexual behavior are found in the lower strata.

Nineteenth and early twentieth century thinking on sexuality rests on the assumption that sex is a natural force, that is unchanging, asocial and transhistorical. During the late 1970s and early 1980s, a new scholarship emerged that challenged sexual essentialism, arguing instead that homosexuality as we know it today is a relatively modern institutional complex (Weeks, 1981). These theories challenged the assumption that sex is biologically ordained, in favor of the constructivist position that sex is constituted in society and history. One of the most influential writings comes from Michel Foucault (1978), who argues that sexuality was invented at the turn of the twentieth century. He suggests that the very category "homosexual" is a social construct which is scarcely more than a hundred years old:
As defined by the ancient civil or canonical codes, sodomy was a category of forbidden acts; their perpetrator was nothing more than the juridical subject of them. The nineteenth-century homosexual became a personage, a past, a case history, and a childhood, in addition to being a type of life, a life form, and a morphology, with an indiscreet anatomy and possibly a mysterious physiology... The sodomite had been a temporary aberration; the homosexual was now a species. (1978, p. 43)

According to Foucault, sexuality became a medical discourse that transformed sexual behaviour into stable notions of identity (Gunkel, 2010). Apart from homosexuals, psychiatrist labelled many other categories of “sexual perverts”, such as zoophiles, sadomasochists and pedophiles. By arguing that sexuality is produced through and within history, Foucault denaturalizes sexuality. One of his main arguments is that ‘the Other’ is constructed by a group in order to define and consolidate the ‘Self’. Thus, homosexuality is constructed as a definite sexual category to help delimit and reinforce heterosexuality. Consequently, social constructionists have argued for a bracketing of a homosexual identity, which is only believed to exist in the contemporary West (e.g. Weeks, 1981; D’Emilio, 1993). Interestingly, in international discussions it is precisely homosexuality, and not heterosexuality, which has increasingly been used to define the ‘Self’ in relation to the ‘Other’ (Puar, 2007; Gunkel and Pitcher, 2008). Same-sex sexuality is increasingly seen in terms of sexual democracy and Western modernization, whereas the ‘Other’ is now discursively redressed as the ignorant homophobe.

**African homosexualities**

Although heterosexuality was the dominant form of sexuality in pre-colonial Africa, there is no doubt that same-sex sexuality was also practiced. Anthropological and historical studies point to the presence of same-sex relations in pre-colonial times in at least fifty-five African cultures (Murray and Roscoe, 1998). While homosexual relationships, roles, and identities can take various forms and manifestations across cultures, this diversity is not unlimited. Anthropologists and sociologists identify three basic patterns in homosexual behavior, all of which can be found in Africa (Murray and Roscoe, 1998). In egalitarian patterns, differences between partners regarding class, race, and age are not the formal basis for organizing the relationship. The authors state that this form, which is found predominantly in the United States and Europe, is historically the most recent one and the least widespread. By contrast, status-differentiated relationships are much older and are either based on differences in age or gender. In age-based
patterns, one partner is older. Typically, the older male takes the insertive role and the younger partner is penetrated. Gender-defined patterns make a distinction between the active and the receptive partner based on gender roles. Receptive males are categorized differently, and are frequently described as behaving and appearing as women. In their study among Senegalese men who have sex with men, Niang et al. (2003) find that these men have distinct identities and social roles that go beyond sexual practice. The insertive partner generally does not consider himself a homosexual, and is often seen as more masculine than the receiving partner. The receptive partner on the other hand, tends to adopt feminine manners and be less dominant in sexual interactions (Niang et al., 2003). Murray and Roscoe (1998) argue that while the terminology of active/receptive, older/younger, and male/female was often used by those who practice same-sex, in reality, sexual roles are often much more flexible and their adoption rather arbitrary.

Although the above-mentioned patterns can be found among men and women, female same-sex patterns are poorly documented and frequently misunderstood (Murray and Roscoe, 1998; Morgan and Wieringa, 2005). The limited data however suggest that gender based patterns are the most common form of female homosexuality on the African continent. In these relationships, a woman becomes a kind of husband to another woman and takes on the parental, kinship and work roles of men. Other relationships are differentiated by age, which can be found for example among the Baganda in Uganda. Here, sexual initiation practices are carried out by an ssenga (or sex aunt), whose role it is to “tutor young girls and women in a wide range of sexual matters, including pre-menarche practices, pre-marriage preparation, erotic instruction and reproduction” (Tamale, 2010). Murray and Roscoe (1998) however note that the question of sexuality within these relationships is hotly debated. In the absence of writings about female homosexuality, Morgan and Wieringa (2005) have recently undertaken a project to document same-sex practices among women in Africa from the viewpoint of African women themselves.

Not only did homosexual acts take place within diverse social contexts, the societal reactions towards it also differed substantially (Phillips, 2003). While some groups paid no attention to homosexual behavior, others institutionalized it or even celebrated it. Yet other groups severely punished homosexual sex because it was perceived as non-procreative and destructive (Phillips, 2003). In addition, some African societies often allowed homosexuality to take place as long as strict taboos on openly discussing or demonstrating it were respected (Epprecht, 2011). During colonial rule however, the European settlers – inspired by Victorian
notions of sinfulness - brought in the first laws enabling governments to forbid and repress it. The colonial legislators assumed that these laws could inculcate European morality into native cultures that did not punish “perverse” sex enough. Human Rights Watch (2008) observes that “the colonial environment was the perfect field for experiments in rationalizing and systematizing law [because] the colonies were passive laboratories.” These laws were successful because, unlike at home, the British government could express a distinct collective will and could carry it out without being hampered by popular discussion” (Human Rights Watch, 2008: 5). In other words, in a setting where homosexual practices were generally not seen as problematic and therefore not an issue in public debate, the colonizers were able to quietly introduce a series of laws that made these practices subject to punishment. A surprising difference can be found between laws regulating male-male sexuality and those regulating female-female sexuality. Many states that criminalize homosexuality have laws that explicitly prohibit homosexual acts among men, but either fail to recognize the existence of female homosexuality or have less precise laws concerning these acts (Greenhill, 2010).

England decriminalized most homosexual conduct in 1967, but this came too late for most of its colonies, including Uganda. When the colonies gained independence in the 1950s and 1960s, they did so with the sodomy laws still in place. Epprecht (2011) observes that the newly gained independence did not produce a counter-rhetoric of tolerance in postcolonial Sub-Saharan Africa. On the contrary, the power of the West “to frustrate, co-opt and humiliate Africans even after political independence worsened the latent or implicit homophobia of early African nationalism” (Epprecht, 2011: 1094). Extreme examples come from post-colonial Sudan and Mauritania, where relatively benign colonial sentences to homosexual behavior were replaced by the death sentence.

Entering the debates: a history of sexual rights at the international level
Although sexual and reproductive rights have gained increasing importance and visibility in human rights language, sexual orientation and gender identity as a specific domain remains a battlefield within international human rights conferences and documents. Petchesky (2000) observes that prior to 1993, no references to the forbidden S-word are made. Sexual life was only implicitly assumed, and then confined within the boundaries of heterosexual marriage and reproduction. For example, the Universal Declaration of 1948 states that “men and women of full
age, without any limitation due to race, nationality or religion, have the right to marry and found a family” (p. 7). Even women’s conference declarations before 1993, such as the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), do not refer to women’s sexuality, much less sexual rights (Petchesky, 2000). However, mainly lesbian movements have used existing treaties to advocate equal rights for LGBT people.

The Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), adopted in 1979 by the UN General Assembly, is often described as an international bill of rights for women⁴. The Convention consists of a preamble and thirty articles, and defines what constitutes discrimination against women and sets up an agenda for national action to end such discrimination. Three articles are of particular interest to lesbian women (Morgan and Wieringa, 2005). Firstly, Article 2 calls upon state parties to take all appropriate measures to eliminate discrimination against women by any person or institution, and calls upon states to enact appropriate legal protection of the rights of women. Secondly, Article 16 stipulates that state parties take all appropriate measures to eliminate discrimination against women in all matters relating to marriage and family relations. Finally, Article 5 calls upon state parties to eliminate prejudices and customary and other practices that are based on the idea of the inferiority of either of the sexes, or on stereotyped roles for men and women. Morgan and Wieringa (2005) observe that CEDAW is a potentially strong tool in the fight for equal rights for lesbian women. However, although most African states have ratified the Convention and are thus legally obliged to abide by its rules, many states have made reservations on important articles, such as Article 16, which make it de facto very difficult to fight for the right for sexual orientation. A second limitation is that not all women’s organizations, particularly those ones that are working closely with the government, are eager to fight for the rights of lesbian women (Morgan and Wieringa, 2005).

In the year 1993, the Vienna Declaration and the Declaration on Violence Against Women introduced the ‘sexual’ into human rights language. During the conference, feminist human rights activists were successful in obtaining clear statements about the urgency of addressing violations of the human rights of women, and in particular, violence against women. During the negotiations, Canada proposed adding sexual orientation to a paragraph prohibiting

⁴ http://www.un.org/womenwatch/daw/cedaw/
discrimination on listed grounds. The final text condemns discrimination, but without a list. The 1994 International Conference on Population and Development (ICPD) in Cairo, was the first to acknowledge that sexual activity is a positive aspect of human society (Petchesky, 2000). It views sexual health as an integral part of reproductive rights, requiring that “people are able to have a satisfying and safe sex life” and defines the purpose of sexual right as “the enhancement of life and personal relations” (paragraph 7.1). The document is not a Convention, such as CEDAW, and as such is does not have the same legal force. However, it is mostly used to fight for reproductive rights, and women’s groups and lesbian groups have hardly employed it to fight the right to sexual orientation as well (Morgan and Wieringa, 2005).

The Beijing Declaration and Platform for Action in 1995 went further towards formulating a concept of sexual rights as a human rights principle (Petchesky, 2000). For the first time, women were recognized to have sexual and reproductive autonomy, who have the right “to have control over and decide freely and responsibly on matters related to their sexuality, including sexual and reproductive health, free of coercion, discrimination and violence” (Fourth World Conference on Women, 1995, paragraph 96). The Beijing conference was the place where, for the first time, sexual orientation was discussed. However, attempts to include even a reference to sexual orientation in the resolution have failed, because they remained bracketed until the final draft version and were eventually dropped in the interest of consensus (Saiz, 2005). This absence was the result of a complex negotiation process in which power relations were played out. The Vatican and a number of Islamic and Catholic states, supported by organizations of the Christian right, condemned the ‘hijacking of human rights’ by feminists and lesbian rights activists, which they saw as a major threat to fundamental religious and cultural values (Saiz, 2005). Sexual orientation was considered a non-subject since it does not appear in any UN treaty. Allowing space for sexual orientation, they argued, would open the floodgates to many unacceptable behaviors, including abortion and pedophilia. In addition, some governments in Asia, Africa, and the Middle East have attempted to bolster their domestic authority through nationalist discourse, by portraying homosexuality as a foreign influence and a manifestation of western decadence. A number of African leaders have defended their country’s sodomy laws on grounds that homosexuality is a foreign disease alien to local norms and traditions.

In 2006, a group of international experts in the area of human rights came together in the Indonesian city of Yogyakarta to speak about sexuality, gender and human rights. They
discussed all international human rights treaties and shaped these human rights towards sexual minorities. The result was a document titled: *The Yogyakarta Principles on the Application of International Human Rights Law in Relation to Sexual Orientation and Gender Identity* (Dubel and Hielkema, 2010). The document is based on the primary premise that gay and lesbian rights are human rights and contains 29 principles in the area of human rights that (also) apply to LGBT individuals. The principles include, among others, the rights to the highest attainable standard of health, the right to found a family, the right to freedom of opinion and expression, and the right to privacy. The Yogyakarta Principles state that the effective protection of human rights for LGBT persons is not only the responsibility of individual states that signed the treaties, but also intergovernmental organizations, the United Nations, the media and many others play a role (Yogyakarta Principles, 2007). It is not a treaty or Convention that is open to ratification by states, but rather a statement prepared by international legal scholars that aims to clarify the rights of sexual minorities under existing human rights laws (O’Flaherty and Fisher, 2008).
2. Analytical Framework

In this study, I am interested in the ways in which an international norm on LGBT rights is negotiated among different actors and how these negotiations are influenced by postcolonial power dynamics. The central research question is: which framing strategies are used in the international debate revolving Uganda’s Anti-Homosexuality Bill, and how are these strategies embedded in postcolonial discourses? To answer the research question, I use framing analysis and discourse analysis.

Framing and the construction of social problems

I see framing as central to the production and negotiation of international norms, as this activity is concerned with the ‘politics of signification’, or the struggle over the production of mobilizing and countermobilizing ideas. Frame analysis has its roots is social movement literature, where scholars have attempted to explain the success and failure of social movements (Benford and Snow, 2000). Benford and Snow argue that social movement actors are not merely carriers of ideas, but that they are actively engaged in the construction and maintenance of meaning. The result of this framing activity are collective action frames, which can be understood as “action-oriented sets of beliefs and meanings that inspire and legitimate the activities and campaigns of social movement organizations” (ibid: 614). They argue that the verb framing “denotes an active, processual phenomenon that implies agency and contention at the level of reality construction” (Benford & Snow 2000: 614, emphasis added). It is active because something is being done, and processual because it entails a dynamic, evolving process. It entails agency because framing is the work of social movement organizations and activists, and it is contentious because it involves the construction of frames that not only differ from existing ones but may also challenge them. Other scholars have applied the concept to the study of public policies, where it as gained the term ‘policy frame’ (Bacchi, 1999; Verloo and Lombardo, 2007; Lombardo and Meier, 2008). Bacchi (1999) argues that public policies are not a response to existing problems, but rather interpretations or representations of what different actors think the problem is about. A policy frame can then be defined as “an organizing principle that transforms fragmentary or incidental information into a structured and meaningful problem, in which a solution is implicitly or explicitly included” (Verloo, 2007). Both approaches can be linked, as both social movements
and political actors attempt to seek solutions for problems in terms of collective action. The possibility to apply framing analysis to both social movements and public policy makes it a suitable tool for analyzing the current debate on Uganda’s Anti-Homosexuality Bill, in which various social movement actors, religious institutions, media and political actors are involved in negotiating an international norm on homosexuality.

The goal of framing analysis is to reveal how specific actors see a problem and which solutions they identify. To identify a frame, a number of sensitizing questions are to be asked. These are: what is seen to be the problem, who is seen to be affected by the problem, who or what caused the problem, how can the problem be solved, and who should solve it (Lombardo and Meier, 2006). It is also relevant to identify who has a voice in defining the problem and solution, because social, economic and political inequalities may exclude some actors from defining the problem and solution. As Verloo and Lombardo (2007: 38) observe, “frames focus attention on certain issues, arguments and actors, while at the same time ignoring or marginalizing others.” They argue that the awareness of inconsistencies and exclusions in policy discourse can both help to sharpen the formulation of policies and to reduce processes of exclusion (ibid). It is in these framing activities where norms are expressed and negotiated.

**Shaping the meaning of a norm**

To study how the meaning of a norm is shaped and changed in different contexts, Lombardo, Meier and Verloo (2009) have introduced a set of concepts, which are fixing, shrinking, stretching and bending. The authors observe that defining a concept, for example in a piece of legislation or in social movement claims, temporarily ‘fixes’ or freezes a norm. Such fixing of what is understood by the norm in question might form an obstacle to further evolvement, but it might also create new opportunities to discuss its content. The authors note that actors have different access to resources and power, which affects the role they play in the framing activity. For example, governments, courts, and parliaments have a strong role in fixing concepts and are usually able to fix a norm form for a longer period. The shrinking of a concept involves the narrowing down of its meaning to something that is confined to a particular policy area of a specific interpretation of an issue. Shrinking often involves a simplification of social problems and of the required solutions. An example is the shrinking of gender equality to numerical representations of men and women in high positions. Stretching is the opposite of shrinking, and
involves the broadening of a concept by developing a larger meaning that expands on its previous understanding. While shrinking often involves a simplification of a social problem, stretching may lead to a dilution or blurring of its previous meaning. **Bending** occurs when the meaning of a concept is adjusted to make it fit something else other than its primary goal. An example is the bending of gender equality to the goal of economic growth.

**Framing Strategies**

In order to analyze the ways in which norms are negotiated among different actors, I am inspired by the idea of ‘frame alignment strategies’. The concept was developed by Snow et al. (1986), who define frame alignment processes as those strategies whereby certain beliefs, values and interests of individuals are linked to a social movement organization’s goals and ideology, in order to make both sets of frameworks congruent and complementary (Snow et al, 1986: 464, emphasis added). According to the authors, framing strategies can be used to shape the political agenda, to convince or persuade other actors, or to challenge dominant meanings. They identify four frame alignment processes. **Frame bridging** refers to “the linkage of two or more ideologically congruent but structurally unconnected frames regarding a particular issue or problem” (1986: 467). It can either involve the linkage of two social movement organizations, or the linkage of a social movement organization with groups of individuals who share the same grievances but who lack the organizational capacity for expressing their discontent and for engaging in action. A second alignment strategy is **frame amplification**, which refers to “the clarification and invigoration of an interpretive frame that bears on a particular issue, problem or set of beliefs” (1986: 469). Since some people may be indifferent or ambiguous to the meaning of certain events or their connection to their immediate lives, support for and participation in movement organizations is often dependent on the clarification and invigoration of a frame. This alignment strategy can involve the “identification, idealization, and elevation of one or more values presumed basic to prospective constituents but which have not inspired collective action”. Often found examples include justice, solidarity, security, equality and morality. They can also contain ideas that support or impede collective action. They may include beliefs about the seriousness of the problem, stereotypic beliefs about antagonists or targets of influence, and belief in the efficacy of collective action, among others. A third alignment strategy is **frame extension**, which refers to the process whereby the boundaries of a movement’s primary
framework are extended so as to “encompass interests or points of views that are incidental to its primary objectives but of considerable salience to potential supporters” (1986: 472). In other words, a social movement organization may attempt to enlarge its constituency by incorporating values and ideas that are not of direct importance to its primary cause, but which resonate with the values and beliefs held by potential audiences.

The three strategies described above have in common that potential adherents share the same values and beliefs as social movements. When the programs, causes, and values of social movement organizations do not resonate with conventional lifestyles and frames, *frame transformation* may occur, a strategy whereby new values are planted and nurtured, old meanings and interpretations thrown overboard, and erroneous beliefs are reframed in order to gain support and mobilize participants (Snow et al., 1986). The authors identify two transformation processes, namely transformations of *domain-specific* and *global interpretive* frames. Both involve a reframing of some set of conditions, which are dependent on a change in the perceived seriousness of the problem and changes in attributional orientation. Transformation of the first type, domain-specific interpretative frames, involve changes in the way ‘a particular domain of life is framed, such that a domain previously taken for granted is reframed as problematic and in need of repair’. Domain-specific transformations frequently appear to be necessary for participation in movements that seek dramatic changes in the status or treatment of a category of people, such as women, migrants or homosexuals. In the second case, transformations of global interpretative frames, “a new primary framework gains ascendance over others and comes to function as a kind of master frame that interprets events and experiences in a new key” (1986: 475). What is involved is essentially a kind of thorough conversion in one’s ‘sense of ultimate grounding’.

While I consider this approach useful for understanding framing activities, it rests on the problematic assumption that there is an inherently positive effect of externalization. The central idea is that the success of a norm is highly dependent on the ability of actors to frame issues in ways that *resonate* with pre-existing beliefs and experiences held by potential adherents. These framing strategies involve a process of *congruence* building that will lead to *complementarity* between different frameworks and actors. Framing strategies are also believed to legitimize certain actions, because a greater audience is deemed to believe in the urgency of the problem and the necessity of collective action. Nevertheless, the situation in Uganda suggests that
congruence building is not always the case, but that other, more negative dynamics are also possible. The idea of frame alignment strategies thus serves a ‘sensitizing concept’ (Glaser, 1978) which leaves the possibilities for alternative possibilities open.

Discourse
A central concern in framing theory relates to the issue of intentionality. That is, to what extent are social movement actors and policy makers ‘free’ to strategically frame issues in order to gain support from potential adherents, and to what extent are they constrained by the broader cultural and institutional contexts in which they operate? According to Benford and Snow (2000), collective action frames can be understood as the strategic shaping of political claims. Although the authors pay some attention to the impact of ideology on the adopted frames, the focus remains on negotiating a frame that will work politically (Bacchi, 2005). By contrast, researchers in the field of critical discourse analysis have pointed to the importance of identifying the discursive structures that influence the way in which people understand events and situations (Bacchi, 2005; Fairclough and Wodak, 1997). Although in principle, “the individual is open to all forms of subjectivity, in reality individual access to subjectivity is governed by historically specific factors and the forms of power at work in a particular society” (Weedon, 1997: 91). Discourses can be seen as claims to the truth that determine “what can be said, in what form and what is counted as worth knowing and remembering” (Mills, 1997). These claims to the truth fix interpretations of social reality as ‘obvious’, ‘normal’ and ‘natural’, and denies the fact that these interpretations are specific and partial. At the same time, conflicting ideas and practices are dismissed as ‘abnormal’, ‘illogical’ or ‘impossible’. As such, discourses have an inherently disciplining effect by delimiting what can be said, thought and done, and by excluding the emergence of alternative ‘possibilities for thought’ (Mills, 1997; Foucault, 1981).

Hegemonic discourses materialize in and legitimize the ways in which social relations and institutions are organized. Fairclough and Wodak (1997) argue that “discursive practices may have major ideological effects – that is, they can help produce and reproduce unequal power relations between (for instance) social classes, women and men, and ethnic/cultural majorities and minorities through the ways in which they represent things and position people” (Fairclough and Wodak, 1997: 258). Such assumptions may in turn have concrete and material consequences because they constitute the basis for future actions and realities (Lombardo, Meier and Verloo,
The goal of discourse analysis then, is “to identify, within a text, institutionally supported and culturally influenced interpretive and conceptual schemas (discourses) that produce particular understandings of issues and events” (Bacchi, 2005).

These insights have important implications for our understanding of framing theory. Because hegemonic discourses may steer an actor’s conscious shaping of an issue towards unintended directions, they enable and at the same time constrain the production of certain frames (Verloo, Meier and Lombardo, 2007). For example, while transnational organizations that advocate for women’s rights are on the one hand powerful actors to define norms and behavior, they are at the same time influenced by gender regimes embedded in specific hegemonic discourses (Lombardo, Meier and Verloo, 2007). These hegemonic structures in which activists operate could in turn unintentionally perpetuate unequal power relations. Bacchi therefore emphasizes the need for reflectivity among scholars and activists. She argues for a two-step procedure that build bridges across these two traditions, by “identifying both the ways in which interpretive and conceptual schemas delimit understandings, and the politics involved in the intentional deployment of concepts and categories to achieve specific political goals” (Bacchi 2005: 198).

This two-step approach forms the empirical backbone of the thesis. In the empirical chapters, I will analyze both the intentional and unintentional framing activities by various actors in the debate revolving Uganda’s Anti-Homosexuality Bill, and what the results of such discursive practices are. The empirical part of structured as follows. Chapter 4 presents a timeline of the period 2009-2012 in order to reconstruct the international debate on Uganda’s Anti-Homosexuality Bill. The timeline reveals to general dynamics, which I call polarization and pluralization. In Chapter 5, I will discuss the first dynamic. While both the West and Uganda use similar framing strategies in the debate, the result is not congruence between global and local norms. Rather, these framing strategies lead to an increased polarization between norms and actors. In Chapter 6, I show that actors also try to negotiate their way out of these fixed categories, and that both norms and actors become fluid and heterogeneous. Both chapters show that the concept of ‘frame alignment strategies’ (Snow et al., 1986) is insufficient to explain the dynamics of norm diffusion in the case of Uganda’s Anti-Homosexuality Bill. Before turning to the empirical chapters, I will discuss the most important methodological issues in the next chapter.
3. Data and Methodology

In this chapter, I will provide additional information on how this research was conducted. The first section offers a reflexive account of my entrance into the field. The second section describes the process of data collection and analysis, and provides an overview of the techniques by which I have attempted to warrant the quality of my data.

Entering the field

The idea that knowledge is constituted in discourse and that people cannot stand outside of discourse has important implications for social reformers and researchers working within this tradition. Discourse analysis is therefore a highly reflexive methodology. Postcolonial scholars have drawn attention to the fact that Western studies about African sexualities are often characterized by false assumptions and stereotypes. This danger of essentializing other cultures also presents itself when analyzing the debate revolving Uganda’s Anti-Homosexuality Bill. Fairclough and Wodak (1997) argue that “researchers, scientists and philosophers are not outside the societal hierarchy of power and status but are subject to this structure. They have also frequently occupied and still occupy rather superior positions in society”. In other words, researchers have the power to speak on behalf of the people they study and, because of their social position, what they say and write counts as ‘truth’. Social scientists therefore need to be aware that they also work within discourses, and that they have to subject their research questions, their categories and their analysis to constant scrutiny (Bacchi, 2005). Such a reflexive analysis is necessary to understand in which hegemonic discourses social scientists operate, and which (unintended) consequences these systems of thought may have for the lives of people that we study. In this study, it is my aim to challenge these racist stereotypes and simplifications by providing a different reading of the debate. I have aimed to go beyond dichotomies by constant reflection and by deliberately searching for the plurality of voices in the debate.

I conducted three months of fieldwork in Kampala, Uganda, between February 2012 and May 2012. Before entering the field, I already had my own preconceptions about what the situation would be like. A great deal of my understanding about the debate came from Western media and public statements by actors who were advocating for LGBT rights in Uganda. Although I suspected that the stories on the ground would be more balanced than the ones that I
encountered in the media, I did not know exactly what to expect, which caused a lot of uncertainties. For example, the Anti-Homosexuality Bill contained a clause that would sentence the promotion of homosexuality with seven years imprisonment, and I seriously considered the possibility that the Ugandan authorities would interpret my research as promoting homosexuality, which could in turn lead to my arrest. Hence, I made sure that I created a safety net by providing the Royal Netherlands embassy my contact details as well as the outline of my research. I also contacted a number of Ugandans and Dutch expats living in Kampala whom I could depend on in case something went wrong. Several people warned me to be careful when doing research on such a sensitive topic. One week before going to Uganda, I had a telephone call with a program officer from Hivos, who advised me not to tell everyone that I was conducting research on homosexuality as it could lead to hostile reactions, especially when people were having alcohol. He offered strategies on how to handle such situations.

The first days in Kampala I felt very uncomfortable. It was the first time that I set foot in Africa and I experienced a genuine culture shock. At the end of the dry season, the place was extremely hot and dusty, with heavy traffic and crowds of people along the unpaved sidewalks. My senses worked overtime as the smell, sight, noise and intense heat simultaneously impacted on me, leaving me feel very tense. My hostel, described by a local newspaper as ‘situated in a post-apocalyptic setting’, was located in a narrow street with potholes and open sewers, full of traffic, garage shops, a bodaboda stage, and women selling fruit and vegetables. Beneath my window lay Katanga slum, one of the biggest slums in Kampala, from where I could hear babies cry, garage shop workers repair cars and loud music play. That first night I couldn’t sleep.

My initial feelings of discomfort were enhanced when I witnessed a mob justice on the second day of my stay. I was having dinner in one of the many food joints in a crowded market place when suddenly someone on the streets yelled ‘Omubbi!’ (thief). From where I was sitting, I could see how a dozen of people quickly assembled into an angry mob that hunted down the alleged thief and started to beat him up. The man was defenceless when he was repeatedly kicked in the stomach, the back, and the head. I paid for my dinner and immediately left the place. More and more people gathered around the scene as I walked in opposite direction, and when I got back to my hostel I felt frightened. I could not imagine how I could possibly carry out a research on a delicate topic such as homosexuality in a country where petty theft was punished.
by vigilante justice. What about my safety and that of my respondents? I decided to keep a low profile until I got accustomed to Kampala and its people.

A few days later, something unexpected happened. The Anti-Homosexuality Bill was retabled before parliament, sparking the international and domestic debate. This development gave me the opportunity to address the topic a lot sooner than I had anticipated. A Kenyan student who stayed in my hostel brought me into contact with a Sudanese human rights activist, who was well acquainted with LGBT activists working at Sexual Minorities Uganda. He gave me their contact details and that same week I had my first interview with a gay activist. Until then I had assumed that Kampala’s gay scene would be underground and difficult to access, and I remember feeling surprised that I had reached SMUG so soon. I thought that I happened to be lucky to encounter someone who could help me out, but later I found out that social networks in Uganda are very large which make it easy to get in touch with other people. Soon after I started my fieldwork, I began to feel very relaxed in my new environment. I was no longer afraid to bring up the subject and felt comfortable enough to talk about it to strangers. Some did not even bother to react, while others engaged in a lively discussion about the topic. Never have I experienced any hostile reactions towards my research topic.

As I stayed longer in the field and as I had more and more conversations with Ugandans, I saw a large discrepancy between the image created in Western mass media and local reality. Although homosexuality has been illegal for decades, there were no persecutions or outbursts of violence towards gays and lesbians. Consequently, I got the impression that things weren’t as bad as they seemed for homosexuals in Uganda, and that the Western media and activists were exaggerating incidents of homophobia. Still, I had to watch out for my own bias, so I tried to challenge this view by conducting thought experiments. For example, I asked myself what Uganda would be like if it was ‘the best place to be gay’. This strategy entailed the explicit naming of things that were not perfect for gays and lesbians, and made me realize that there are still many discriminatory practices in Uganda (e.g. access to housing and health care). This led to a more balanced view of Uganda rather than simply ‘the worst place to be gay’ or ‘not bad at all’.

Not only did I have certain preconceptions about the field and my respondents, my respondents also had their own preconceptions about me, which were mainly shaped by both my research topic and my identity as a Western researcher. Doing research on homosexuality proved to be a major challenge as I wasn’t the only one who was interested in the debate. On the
contrary, since the introduction of the Anti-Homosexuality Bill in 2009, there had been a continuous Western attention for Uganda and gay rights issues, and people were getting tired of it. I was one of the many *wazungu* (whites) who came to Uganda looking for a story on homosexuality, and during the three months that I conducted fieldwork in Kampala, there were at least two other (European) university students doing research on the same topic. Many Ugandans asked me why the West was so concerned with homosexuality while neglecting other, in their eyes more pressing, issues.

Moreover, the continuous attention for gay rights had more often than not led to a negative portrayal of Uganda. Many of the Western students, reporters and journalists who had conducted research before me had been guided by one key question: Why is Uganda so intolerant towards gay people? The reports they wrote and documentaries they made were largely one-sided and negative, and reproduced many of the racial stereotypes about a violent and homophobic country (Tamale, 2011b). For example, the BBC documentary ‘The World’s Worst Place to be Gay’ depicts Ugandan homosexuals as helpless, passive victims in a backward country that shows no sign of change. As a result, many Ugandans were understandably sceptical and reluctant when I asked them for an interview. Some simply stated that “didn’t have time to do an interview”, whereas another said more directly that he was “fed up with my kind of people”. One pastor said that previous researchers “had been putting words in their mouths” and reduced them to “gay haters”. Another respondent asked me what the point of using my voice recorder was; she had been recorded on tape before but was later misquoted nonetheless. Thus, not only were people tired of having to tell the same story over and over again, they also felt that their voices weren’t represented adequately.

I found out that people were more willing to talk to me when I addressed these issues when I introduced myself. Hence, I told respondents that I felt uncomfortable with the negative portrayal of Uganda in Western mass media that scandalized incidents of homophobia. I confessed that I had been influenced by their reporting too, until I had witnessed that Uganda was also a place where most homosexuals were able to work and live. I also expressed my concerns over the threats made by some Western donors to cut off aid to Uganda. These comments generally broke the ice and often led to agreement among my respondents, including

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5 “The World’s Worst Place in to be Gay”. Available from [http://www.youtube.com/watch?v=fV0tS6G8NNU](http://www.youtube.com/watch?v=fV0tS6G8NNU)
LGBT activists. I had the impression that people were more open towards me when I commented upon these issues.

I think the way I entered the field illustrates how discourses profoundly influence our understanding of an issue, and how they create reality. Hegemonic Western discourses about gay rights heavily rest on the assumption that Ugandans are inherently different from us, and portray Ugandan gays as victims in a violent country. The debate on the Anti-Homosexuality Bill is not only a site where an international norm on homosexuality is negotiated, but also a site where racist and simplified assumptions about Ugandans and Africans prevail. It follows that researchers who study these dynamics are not neutral or objective, but rather subject to these hegemonic discourses which may shape their perception of reality. In this case, they created real or perceived risks, such as getting arrested, while witnessing a mob justice became easily linked to my research topic while it had nothing to do with it. If I had chosen a different research topic, the event would probably not have had the same impact on me. These insights emphasize the need for researchers to critically reflect upon their work, especially when conducting research in a postcolonial setting. By deliberately searching for the diversity of voices within the debate, both in Uganda and the West, I have attempted to give a different reading of the situation in order to go beyond such simplified representations.
Sampling strategy

The aim of doing research is to produce knowledge that can be shared and applied beyond the research setting (Malterud, 2001). The nature and extent of the data will determine the degree to which the findings can be transferred to other settings, so sampling decisions are crucial. In quantitative research, researchers study a portion of a defined population in order to make general statements about the population as a whole. The sample should therefore represent the key characteristics of the population that is under study. By contrast, qualitative research is guided by an interest in understanding a phenomenon. Researchers study a case in-depth in order to understand “the conditions under which the construct or theory operates” (Miles and Huberman, 1994: 29). They are not interested in making general statements about a population, but want to ascertain whether the findings can be transferred to other instances where the phenomenon occurs. Consequently, the sample should not be driven by a concern for representativeness, but rather by the research question itself (Miles and Huberman, 1994). The aim of the sampling strategy was to capture and to uncover the diversity of voices within the debate on homosexuality and to uncover the plurality of positions. For this purpose, I combined a number of sampling strategies, namely critical case sampling, snowball sampling, confirming and disconfirming cases, and intensity sampling (Teddlie and Tashakkori, 2009).

After having selected the transnational struggle for LGBT rights in Uganda as a critical case for understanding processes of norm diffusion in postcolonial settings, my next sampling strategy was snowball sampling. This technique involves using informants or participants to identify additional cases who may be included in the study. I started sampling by collecting material that was publicly available, such as statements and newspaper articles, and by tracing the voices that were represented in this material. Because documents would often react or refer to other documents, governments or social movement actors, each case or site provided information that leded me to the next logical site or case. I also asked my respondents who other major actors in the debate were and where I could find them. Third, confirming and disconfirming cases involves selecting units of analysis that either verify or refute emerging patterns in order to further understand the phenomenon under study. Confirmatory cases are additional examples that fit already emergent patterns; these cases confirm and elaborate the findings, adding richness, depth, and credibility (Patton, 1990). For example, I interviewed men and women from several Western embassies and LGBT organizations. I looked for disconfirming cases by deliberately
searching for voices that were different from the emerging patterns. For example, it is often said that the Church and homosexuality are incompatible. However, the retired Ugandan Bishop Christopher Ssenyonjo openly advocates for LGBT rights, which is why he was deliberately included in the sample. Similarly, human rights organizations that do not regard homosexuality as a human right (e.g. HURINET-Uganda) were also included in the sample. **Intensity sampling** involves selecting very informative cases that represent a phenomenon of interest intensively. The researcher seeks excellent or rich examples of the phenomenon of interest, but not unusual cases (Patton, 1990). During my fieldwork, I learned that the two most powerful camps in the debate are the “gay rights lobby” coming from several Western countries and the LGBT movement, and the “pro-family lobby” which consists mainly of evangelical movements in the US and Uganda. Both camps were thus highly informative cases that needed to be included in the sample and studied in-depth.

By constructing the sample in this way, I have attempted to capture the diversity of voices within the debate. The sample therefore consists of both international and domestic players, as well as the various positions that can be distinguished within the debate. Moreover, the sample consists mainly of Ugandan actors in order to account for the diversity of voices within Uganda and, consequently, to get beyond a dichotomy of a pro-homosexual West and an anti-homosexual Uganda. From the data, I constructed five categories of actors, namely the Ugandan government, Western governments, human rights organizations, religious actors, and the media (see table 1). The categorization of actors is thus grounded in the data itself. This generalization to categories already took place during the data collection process, but I adjusted my categorization several times during the research process. For example, the initial category ‘churches’ was extended to include other religious actors as well, such as the non-governmental organization Family Life Network. It is important to note that the categories are not mutually exclusive, but that they often overlap. For example, Ugandan churches are often involved in human rights work and human rights organizations often have a religious basis. Many gays and lesbians in Uganda are religious and work intensively together with Bishop Christopher

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*I deliberately use the term ‘pro-family’ and not ‘anti-gay’, because the former is used by organizations themselves. The term ‘anti-gay’ is usually employed by pro-gay rights advocates in order to condemn the ideology and activities of Christian pro-family movements.*
Ssenyonjo, The categories ‘religious actors’ and ‘human rights organizations’ should therefore be seen as fluid and dynamic.

*Table 1: List of actors*

<table>
<thead>
<tr>
<th><strong>Ugandan government</strong></th>
<th><strong>Human rights organizations</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Ugandan Parliament</td>
<td>Human rights network Uganda (HURINET)</td>
</tr>
<tr>
<td>Uganda Media Centre</td>
<td>Forum for Women in Democracy</td>
</tr>
<tr>
<td>Uganda Human Rights Commission</td>
<td>East and Horn of Africa Human Rights</td>
</tr>
<tr>
<td><strong>Western governments</strong></td>
<td>Defenders Project</td>
</tr>
<tr>
<td>Royal Netherlands Embassy</td>
<td>Freedom and Roam Uganda</td>
</tr>
<tr>
<td>Swedish embassy</td>
<td>Sexual Minorities Uganda</td>
</tr>
<tr>
<td>American embassy</td>
<td>Icebreakers</td>
</tr>
<tr>
<td><strong>Religious actors</strong></td>
<td><strong>Media</strong></td>
</tr>
<tr>
<td>Pentecostal Assembly of God</td>
<td>Rolling Stone</td>
</tr>
<tr>
<td>Watoto Church</td>
<td>Red Pepper</td>
</tr>
<tr>
<td>Uganda Episcopal Conference</td>
<td>The Daily Monitor</td>
</tr>
<tr>
<td>Church of Uganda</td>
<td>New Vision</td>
</tr>
<tr>
<td>Family Life Network</td>
<td>BBC News</td>
</tr>
<tr>
<td>Bishop Christopher Ssenyonjo</td>
<td>The Guardian</td>
</tr>
<tr>
<td>American Evangelicals</td>
<td>ABC News</td>
</tr>
</tbody>
</table>

*Research assistant*

During the first few weeks of my fieldwork I conducted my research alone, but soon I employed Alex, a young Ugandan man whom I met in my hostel, as my research assistant. Alex was deeply interested in my research topic and he offered to be my assistant. It was very useful to have someone with an emic perspective on homosexuality assisting me. On many occasions he would tell me about cultural attitudes towards homosexuality in Uganda, which I could subsequently cross-check in my interviews. This enabled me to adjust my biased view a lot faster than I would have otherwise, and gave me new input for my research. He also accompanied me to my interviews. When Alex was with me, I always made sure that I introduced him as my research assistant.
assistant. Sometimes he sat in another room while I was doing the interview, at other times he was present in the same room, but he never engaged in the interview.

**Data collection techniques**

I combined a number of data collection techniques, including formal interviews, informal conversations, and collection of secondary data. The use of multiple sources of data is referred to as triangulation. Triangulation is generally understood as a way of increasing the quality of a study because it can help facilitate deeper understanding of a phenomenon. By using multiple sources of data, a researcher can offer a richer and more comprehensive account of the situation (Guba and Lincoln, 1985).

First, I conducted 22 **formal interviews** with churches, media, government institutions and NGOs. These interviews were semi-structured, because they contained initial guiding questions, but were mostly designed to give actors as much room as possible to talk about their own opinions and experiences. I visited respondents in their offices, and the interviews usually took between thirty minutes and one hour and a half. In the early stages of my fieldwork, my aim was to get the story complete. Hence, I asked respondents from different backgrounds their version about the recent developments in Uganda, and I looked for overlapping and contradicting pieces of information. As such, I was able to reconstruct the debate on homosexuality based on the perspectives of different actors in Uganda. I also used to sketch a map of the different actors in the debate with arrows indicating the relationships between them, which I brought to my interviews. During the interview, I showed the map to my respondents and asked them if my view of the situation was accurate. Often my respondents offered ways to improve my mapping by introducing new actors whom I should talk to. After each interview I would refine my mapping, until no more actors were included. This strategy is referred to as member checking (Guba and Lincoln, 1985).

During interviews, I tried to show an open attitude in order to give respondents as much space as possible to express their ideas. I asked seemingly obvious questions like ‘what is homosexuality?’ and ‘what do you mean when you say that homosexuality is a sin/ a human right /un-African?’, a strategy that can be used to discover the life-world of respondents (Hermanns, 2004). I also asked my respondents about their position in the debate, how they felt about other positions and I asked questions about the (financial) background of their
organizations in order to be able to analyze the power dynamics between the actors. At times I was unsure whether I should engage into a discussion about homosexuality or not. These opportunities sometimes presented themselves during an interview when a respondent asked me about my position in the debate. I decided not to give my opinion or to simply agree, and to focus my attention on the norms and ideas of my respondents. This made our relationship rather unequal, because I was the one asking the questions and deciding whether or not to engage in a discussion. I sometimes felt uneasy because I was expecting honest answers from my respondents while I was reluctant to express my own ideas. Nevertheless, I felt that it was precisely my aim to foreground the norms and ideas of my respondents. Giving my opinion during an interview might have altered my respondent’s answers and their willingness to open up to me. Given the importance attached to spoken words in discourse analysis, I used my voice recorder as much as possible during these formal interviews. I always asked my respondents for their permission before I started recording and I told them the voice recorder could be turn off at any point during the interview. I also explained them how their information would be used in my research. Quotes derived from fieldwork which I present in this study will be linked to organizations, not to the persons who expressed them. Some actors could not give me an official stance on the subject because it was deemed “too sensitive” by their organizations, but were willing to discuss the matter with me in private. When I came home, I quickly wrote down what I remembered. Three respondents wished not to be recorded on tape; all of them were large donors.

In addition to formal interviews, I used informal conversations as a method of data collection. Many of these conversations were held with my research assistant, LGBT activists and students at Makerere University. I attended afternoon meetings at Freedom and Roam Uganda where we discussed safe sex practices, and I participated in a workshop on LGBT rights at the faculty of Law at Makerere University. These informal gatherings gave me the opportunity to get to know some of my respondents better and to get more contextual data on the subject. For example, I learned that there had been several cases of child molestation in Uganda, and that concerns about this were articulated in the debate revolving the Anti-Homosexuality Bill. Because the current penal code of Uganda defines rape as ‘unlawful carnal knowledge of a girl or woman, without her consent [...]’, men who had raped young boys could not be brought to trial, and some of the proponents of the Anti-Homosexuality Bill see the proposed legislation as an attempt to fill these loopholes in the current law system. By linking child molestation to the
threat that homosexuals pose to society, it becomes a piece of “fragmentary or incidental information in the construction of the problem” (Verloo, 2005: 20). Another important piece of contextual information is the notion of ‘silence’ in Uganda. Whereas silence in Western countries is often seen as an absence of information, in many African cultures silence can be as powerful and empowering as speech (Tamale, 2011a). Given the fact that sexuality is by definition an intimate subject, doing research on African sexualities as a Westerner poses the risk of losing the rich cultural connotations and multiple meanings that surround silence. For example, my research assistant explained that many Ugandans know that homosexuality has always existed in Ugandan society, but that they prefer not to talk about it. The expression “I don’t accept homosexuality” may therefore also mean “I do not want to talk about it”. Several respondents have confirmed this ‘silent tolerance’ towards homosexuals in Uganda. For example, an LGBT activist said that at his home, they have a policy of ‘don’t ask, don’t tell’. His family knows that he is a homosexual and an activist, but they leave the matter unspoken.

A final method concerned the collection and analysis of secondary data. I collected media reports, policy documents, public statements and other publicly available documents not only to broaden my understanding of the subject, but also to analyse the dynamics of norm creation among different actors. I have sampled documents of a number of actors who I also talked to in the field, such as the Catholic Church of Uganda and The Family Life Network. By using multiple sources per actor, I have tried to get a richer account of the debate. In addition, I sampled documents of actors whom I could not directly talk to in the field, such as the American evangelicals. By including their public statements, their voices could be represented in this study. A list of the secondary data can be found in the Annex.

During my fieldwork, I tried to organise my data in a number of ways. One important method was keeping a diary. After an interview or informal conversation, or when I read something on the internet, I wrote down the new information in a document on my laptop and my thoughts about it. This enabled me to monitor my own progress and to see whether information was still missing. Every four weeks, I e-mailed the main points of my diary to my supervisor, who commented on my thoughts and gave me advice on how to proceed. This technique is referred to as peer-debriefing (Guba and Lincoln, 1985). I also kept record of my respondents by grouping them according to the type of organization they belonged to (i.e. religious organization, human rights organizations), and by archiving their contact details as well.
as the contextual information about their organizations. The raw interview data are stored on my computer. My initial idea was to transcribe all interviews literally. However, as transcribing interviews proved to be a time-consuming process, I have only transcribed the parts that were related to my research question, while parts that were not directly relevant for the thesis were summarized and labeled.

Data analysis

Qualitative research is characterized by an iterative process. The methods of data analysis must therefore not be seen as a strict sequence of events, but rather as an ongoing circular process. In order to analyze the data, I uploaded all transcriptions of the interviews and secondary data in the software program Atlas-Ti. One important part of the analysis was reconstructing the different frames that are mobilized in the debate. For this purpose, I used the sensitizing questions that were developed by Lombardo and Meier (2006, see page 25 of this thesis). I searched for text fragments that provided an answer to these questions. After coding each document, I searched for patterns and differences in problem statement and proposed solution using pattern coding (Miles and Huberman, 2004). I reconstructed seven frames that constitute different problem statements and solutions. To reconstruct the frames, I used words and concepts used by actors themselves as much as possible. The aim after all is to show what different actors think the problem is about, not to state what the researcher the problem is about. This explains why I sometimes use the word ‘homosexuals’ and at other times ‘LGBT people’.

I also analyzed the framing strategies that are used by different actors to mobilize participants and persuade others. The concept of frame alignment strategies was used as a sensitizing concept (see page 26-27 of this thesis). A combination of inductive and deductive coding was used. As a first step, I searched for patterns that confirmed the theory. I found out that some strategies can be explained by using the concepts developed by Snow et al. (1986). During the course of the research however, new concepts had to be developed because the term ‘frame alignment’ does not sufficiently address other possibilities to frame an issue. Finally, a discursive analysis was conducted to unravel the conceptual schemas that delimit understandings. I searched the texts for words and values that are presented as ‘natural’, ‘normal’ and ‘logical’, and how these normalizations have disciplinary power. I also analyzed the ways in which homosexuality was articulated to other themes, such as national sovereignty and imperialism.

Sexual conduct between two persons of the same sex has been a criminal offence in Uganda since 1897, when the British applied the Indian Penal Code of 1860 to Uganda. Section 145 (a) of the Penal Code Act provides that any person who has “carnal knowledge of any person against the order of nature” commits an offence and is liable to imprisonment for life. However, few arrests, prosecutions and convictions have been made under this section, which suggests that this law is redundant (Ugandan Human Rights Commission, 2009). According to Tamale (2011b), there are hardly any records of homosexual indictments or convictions in the court registers as it extremely difficult to prove such offences. However, as I have shown in the Theoretical Chapter, transnational sexual rights activists have increasingly attempted to decriminalize homosexuality worldwide and to establish an international binding agreement that commits states to recognize the human rights of gays and lesbians. The current debate on Uganda’s Anti-Homosexuality Bill must therefore be seen as a site where the transnational struggle for LGBT rights is played out. In the following, I will describe the background of the bill, as well as the domestic and international responses that the bill generated.

Background of the Bill

In March 2009, The Family Life Network, a non-governmental organization funded by US evangelicals and based in Kampala, organized a conference with the aim of ‘exposing the truth about homosexuality and the homosexual agenda’. Invited were American evangelicals Scott Lively, Don Schmierer and Caleb Lee Brundidge, all three of whom have been active in promoting family values in Uganda. Among their audience were media, civil society organizations, and politicians. During the conference, the evangelicals addressed questions with regard to the causes of homosexuality and how can be it cured. Drawing upon the self-help book *Coming out straight* by ex-gay and therapist Richard Cohen, the evangelicals alleged that homosexuality is a mental disorder that can be cured, and warned that homosexuals are trying to destroy the traditional family. They also maintained that homosexuals have a higher risk to

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8 See for example Gusman (2009), Kaoma (2009) and Human Rights Watch (2009) about the role of American evangelicals in abstinence only-programs in Uganda.
molest children. They pointed towards the recent decriminalization of homosexuality in the United States, which they considered destructive to the moral fabric of society. Warning Uganda from facing the same faith, they called upon their audience to keep Ugandan laws that prohibit same-sex marriage in place.

Soon after the conference, The Family Life Network collected over 50,000 signatures from parents that were calling upon the Ugandan government to “save our children from being recruited into homosexuality” (Tamale, 2011b). In October 2009, The Anti-Homosexuality Bill was tabled in the Ugandan Parliament by MP David Bahati. The preamble to the Bill states that it aims to “strengthen the nation’s capacity to deal with emerging internal and external threats to the traditional heterosexual family” and to ‘protect the cherished culture of Uganda against the attempts of sexual rights activists seeking to impose their values of sexual promiscuity on the people of Uganda’. While same-sex behavior was already criminalized under British colonial rule, the bill went further in that it introduced the death penalty for people who commit ‘the offence of aggravated homosexuality’, which includes sex with a minor and sex with a person who is disabled. The bill also would criminalize the “promotion of homosexuality,” which would make the work of national and international activists and organizations who work with gay rights issues in Uganda more difficult.

**International and Domestic Responses**
The bill immediately caught the attention of Western NGOs and governments, who condemned the legislation as a violation of human rights. President Obama criticized the Anti-Homosexuality Bill as ‘odious’, and human rights organizations such as Human Rights Watch and Amnesty International called upon the Ugandan government to reject it. A number of Western media, human rights organizations and Ugandan gay activists accused the American evangelicals for playing a key role in the drafting of the Anti-Homosexuality Bill and for instigating hate in Uganda. However, the evangelicals themselves have later distanced themselves in varying degrees from the proposed legislation, ranging from complete opposition

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9 According to American journalist Jeff Sharlet (2008), Bahati is a core member of The Family, a powerful religious and political organization based in the US. Sharlet, as well as other journalists and researchers, have accused US actors for being the driving force behind the bill (e.g. Kaoma, 2009). In a personal interview however, Bahati stated that the Bill is a homegrown initiative, calling it imperialistic to think that Americans have initiated the law.


to only rejecting the death penalty. For example, in an e-mail to the Guardian in November 2009, Scott Lively wrote:

I have stated publicly that I do not support the bill as written. It is far too harsh and punitive. My purpose in addressing members of the Uganda parliament in March was to urge them to emphasize therapy, not punishment in their anti-homosexuality law… [Public policy should] actively discourage homosexuality but only as aggressively as necessary to prevent its public advocacy, much the way laws against marijuana are used in various states here in the US: the law is very lightly enforced, if ever, but the fact the law is on the books prevents advocates of the drug from promoting it, for example, in public schools.\(^\text{12}\)

Later that month, several media reports revealed that the Swedish government warned Uganda that it ran the risk of losing foreign aid over the ‘appalling’ legislation. The Swedish Minister for Development Cooperation, Gunilla Carlsson, stated that she was doubly disappointed, because “the law is wretched, but it’s also offensive to see how Ugandans choose to look at how we see things, and the kind of reception we get when we bring up these issues.”\(^\text{13}\) In a personal interview however, a Swedish government representative said that the media had misinterpreted the Minister’s words, and that her statement was rather about relocating aid to other areas. Nevertheless, the Ugandan Minister of Ethics and Integrity, Nsaba Buturo, soon released a press statement in which he condemned the Swedish threats to cut aid to Uganda and stated that “countries which are annoyed at our independence to enact our laws […] should be helped to understand that the Bill is going through the normal democratic process of debate”\(^\text{14}\).

It was also during that time that more churches began to speak up. On December 23th, the Catholic Archbishop of Kampala, Cyprian Lwanga, criticized the Anti-Homosexuality Bill for being at odds with Christian core values. Lwanga stated that while the Church considers homosexuality as immoral behavior, it equally teaches the message of respect, compassion and sensitivity. In February 2010, Bishop Henri Luke Orombi from the Anglican Church also released an official statement on the Bill, stating that he does not recognize homosexuality as a human right because it is incompatible with the Bible. Instead of an Anti-Homosexuality Bill


\(^{13}\) “Sweden to cut aid over anti-gay law.” Retrieved from http://www.monitor.co.ug/News/National/-/688334/816884/-/wff05e/-/index.html

however, the Anglican Church recommended a Bill that would amend the Penal Code Act addressing loopholes, such as protecting the boy child, proportionality in sentencing, and ensuring that sexual orientation is excluded as a protected human right. Orombi added that “The Church is a safe place for individuals, who are confused about their sexuality or struggling with sexual brokenness, to seek help and healing”. Pastor Rick Warren, who had worked intensively with pastor Martin Ssempa in promoting abstinence in Uganda, posted a video message on YouTube in which he denied any involvement in the Anti-Homosexuality Bill which he ‘vigorously condemned’. The National Taskforce Against Homosexuality, chaired by pastor Ssempa, promptly followed with a response in which they demanded “a formal apology for insulting the people of Africa by your very inappropriate [sic] bully use of your church and purpose driven pulpits to coerce [sic] us into the “evil” of Sodomy and Gaymorrah.”

In October 2010, the sensationalist tabloid newspaper The Rolling Stone published a story under the headline Hang them: they are after our kids! The article, written by two students from Makerere University, revealed the identity of gays and lesbians in Uganda who allegedly aimed at ‘recruiting at least one million members by 2012’. Although the story did not gain a lot of attention within Uganda, Western media quickly picked it up and saw it as exemplary of the violence directed towards gays and lesbians in the country. One month later, the editors published another story in which homosexuals were accused of working with Al Shabaab and Kony’s LRA to plot terrorist attacks in Kampala. Soon after, the tabloid ceased to exist. In February 2011, Ugandan gay activist David Kato was murdered in his home by a male assailant. Since Kato was one of the people whose photo appeared in the Rolling Stone under the headline Hang Them!, activists and international media claim that he was murdered because of his sexuality. Nevertheless, Ugandan police say that he was killed over a personal disagreement with a man known to him. The assailant has been sentenced to thirty years imprisonment.

In October 2011, UK’s Prime Minister David Cameron threatened to cut aid to African countries with a poor record on gay rights. John Nagenda, the Ugandan presidential advisor, replied that the UK was showing a "bullying mentality" and an “ex-colonial attitude”. African human rights activists also responded by asserting that such threats are grounded on false

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15 “Letter to the pastors of Uganda.” [http://www.youtube.com/watch?v=1jmGu9o4fDE](http://www.youtube.com/watch?v=1jmGu9o4fDE)
16 A photocopy of the article can be found at [http://www.boxturtlebulletin.com/2010/10/26/27585](http://www.boxturtlebulletin.com/2010/10/26/27585)
17 In July 2010, 74 people died and 70 were left injured as a result of terrorist attacks in Kampala during the 2010 FIFA World Cup Finals. Al-Shabaab has claimed responsibility for the attacks.
assumptions about African sexualities and that they fuel a hostile climate for gays and lesbians. They also criticized the international community for singling out gay rights as ‘special’ rights. In November 2011, The Family Life Network launched the *Pass the Bill Now Campaign*. In a statement they reaffirmed the need for a strong legislation in order to protect the children and nation from the global homosexual agenda. On December 6 2011, International Human Rights Day, Secretary of State Hillary Clinton gave a speech entitled “Free and Equal in Dignity and Human Rights”. In her speech, Clinton addressed what she called “one of the remaining human rights challenges of our time”, namely ensuring human rights for LGBT people.

Early February 2012, David Bahati reintroduced The Anti-Homosexuality Bill in Parliament. It was done so in its original form but contained several amendments. For example, the clause that would penalize ‘the attempt to commit homosexuality’ was removed because such an attempt is difficult to establish and would lead to absurd situations. Contrary to several media reports, the death penalty was not removed from the proposed legislation. Western governments and human rights organizations condemned the reintroduction of the Bill. Amnesty International described it "a grave assault on human rights" and said it was alarming that Uganda's parliament would again consider it. The Ugandan Media Centre followed with a statement in which they emphasized that the Bill did not enjoy the support of the Cabinet but that it was going through the “normal democratic process of debating”. In June 2012, The Daily Monitor announced that religious leaders from across Uganda had asked Parliament to speed-up the process of enacting the Anti-Homosexuality law in order to prevent what they called “an attack on the Bible and the institution of marriage”. In addition, it appears that government actions against what they call ‘the promotion of homosexuality’ have increased. On February 14th and June 18th 2012, Simon Lukodo shut down two LGBT workshops, and on June 20th he announced that the Ugandan government would ban 38 organizations that were accused of promoting homosexuality.

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In October 2012, Speaker of the Ugandan Parliament Rebecca Kadaga was involved in a diplomatic stir with Canada’s Foreign Minister John Baird at a meeting of the Inter-Parliamentary Union in Quebec. During the meeting, Baird warned Uganda not to trample upon human rights. In a response, Kadaga said that Uganda was neither a colony nor protectorate of Canada and as such her sovereignty, societal and cultural norms were to be respected. She continued that “if homosexuality is a value for the people of Canada they should not seek to force Uganda to embrace it. The subject under discussion is *Citizenship, Identity and Linguistic and Cultural Diversity in a Globalised World*, please stick to it.” Later that month, Kadaga announced that the Anti-Homosexuality Bill would be passed before the end of the year as a “Christmas gift” to Ugandans. In a reaction to this news, Archbishop Desmond Tutu of South Africa wrote an open letter to Ugandan MPs in which he urged them to drop the Bill. In the Daily Monitor he wrote: “God does not say black is better than white, or tall is better than short, […] or gay is better than straight. No. God says love one another; love your neighbour. God is for freedom, equality and love.” He also stated that “the depiction of members of the LGBTI community as crazed and depraved monsters threatening the welfare of children and families is simply untrue, and is reminiscent of what we experienced under apartheid and what the Jews experienced at the hands of the Nazis.” The Daily Monitor also published an article in which it was stated that the German government had decided not to cut aid to Uganda due to the Anti-Homosexuality Bill, but will instead pressure individual politicians to block it. According to the article, the decision was based on advice from gay activists, who are said to have convinced Germany that aid cuts don’t produce the desired results. The Bill was not passed as a Christmas gift, but is still pending in Parliament.

The timeline reveals two general insights. On the one hand, the timeline shows that both proponents and opponents of the Anti-Homosexuality Bill polarize the debate by freezing it temporarily in two camps, namely a pro-gay West versus an anti-gay Uganda. On the other hand, actors try to negotiate their way out of these fixed categories, which suggests that both norms and actor positions are dynamic. The following two chapters will deal with these dynamics.

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5. Us and Them: Polarizing the debate

_Uganda, the worst place to be gay? The Anti-Homosexuality Bill from a “dominant” Western perspective_

In Western representations of the debate, there is often a negative portrayal of Uganda as a violent and homophobic country. This becomes evident in the selection of incidents of violence that keep returning in Western media coverage of the debate, such as David Kato’s murder, the Rolling Stone publication that called for the hanging of gays, and the death penalty in the proposed Anti-Homosexuality Bill. The situation for gays and lesbians in Uganda is generally described in negative words. Western mass media, as well as a number of Western NGOs and governments use postcolonial language to describe Uganda as ‘the worst place to be gay’. In these representations, Uganda is defined as inherently dangerous and inhospitable to LGBT people. There is no attention for different voices or the silent majority who may not have any problems with homosexuality or might even be tolerant towards it. In other words, all Ugandans are assumed to support the ‘hanging of gays’, implying that the threat is everywhere. Moreover, there are no signs of possible change: Uganda has always been and will always be intolerant to gays. There is also a negative portrayal of American evangelicals who are believed to have instigated hate in Uganda, and who are frequently seen as the ‘manufacturers’ of the Bill. Through such portrayal, Ugandan policy makers are indirectly constructed as puppets of American conservative movements.

While the majority of Ugandans are depicted as violent homophobes, Ugandan gays and lesbians are often reduced to victims. Moreover, the victims of anti-gay violence in Uganda are assumed to suffer more than in Europe and the United States. Although Hillary Clinton mentions that the situation in her own country is far from perfect because “for some people, bullying and exclusion are daily experiences”, the examples of violence in developing countries that are mentioned are far more extreme, and include murder, corrective rape of lesbians, execution, forced hormonal treatment for transgender people, arbitrary arrests, and refusal of life-saving health care. It is stated that some gays have to flee the country and seek asylum because they are
persecuted at home. In short, whereas homosexuals in the United States are being ‘bullied’, in developing countries being gay is a matter of life and death.

By contrast, LGBT activists who fight for human rights are seen as brave and heroic because they are assumed to face death treats every day. There is great admiration for LGBT activists who, despite the dangers, risk their lives in continuing to defend the rights of sexual minorities. Ugandan LGBT activists are generally praised for their “tremendous courage in the face of discrimination and violence against LGBT people in Uganda”. Their work to “end a despicable climate of fear” is seen as an inspiration to LGBT activists over the world who face threats, violence and imprisonment based on their sexual identity. While I do not want to deny the difficult circumstances in which LGBT activists in Uganda often operate, the almost saint-like portrayal of Ugandan LGBT activists in a ‘despicable climate of fear’ is equally simplistic and one-dimensional as the image that all Ugandans are homophobic. In addition, singling out LGBT issues obscures the fact that there are many more human rights activists in the country who are subjected to violence based on their work, but who do not gain similar status (e.g. journalists and women’s organizations).

Western representations of the debate do not only contain stereotypes about Uganda, they also tend to simplify and homogenize the West. In this process, the West is constructed as inherently different from Uganda. While the majority of Ugandans are constructed as violent and homophobic, the West is portrayed as modern, liberal and tolerant. Gay rights are linked to positive values such as equality, respect, freedom, justice, morality, and dignity. The West is also constructed as a place where developments and progress are made. While the list of human rights violations in Uganda is assumed to be endless, Clinton enumerates the successes that the human rights movement has made in the United States:

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26 According to a recent BBC article, asylum cases in Uganda as a result of anti-gay violence are on the rise (“Gay Ugandans flee fearing for their lives”. Retrieved from [http://www.bbc.co.uk/news/world-africa-17058692](http://www.bbc.co.uk/news/world-africa-17058692)). However, a reporter from the Ugandan newspaper *The Observer* stated that some Ugandans deliberately take the debate as an opportunity to apply for a visa in Europe or USA in an attempt to escape poverty (personal interview).

We fought a brutal war over slavery. People from coast to coast joined in campaigns to recognize the rights of women, indigenous people, racial minorities, children, people with disabilities, immigrants, workers, and on and on. And the march towards equality and justice has continued. Those who advocate for expanding the circle of human rights were and are on the right side of history, and history honors them.

The underlying message can be read as follows: we make progress, while Uganda shows no sign of change. The words “people from coast to coast” imply that everybody in the United States was involved in these movements. In reality however, people in the United States are far from homogeneous, and many civil society organizations have fought to oppose equal rights for minority groups. No attention is paid to the role American evangelicals have played in fueling anti-gay sentiments in Uganda and other African countries, or to the fact that in the West the discussion over gay rights is far from over. Constructing the West as liberal and tolerant moreover shows a lack of historical awareness. There is no mentioning of how anti-homosexuality laws in Africa and elsewhere were in fact a Western invention, which were informed by Christian morals that regarded homosexuality as sinful. It was not until recently that homosexuality became linked to the human rights framework. At the same time, the idea of homosexuality as a human right is given a new taken for granted status, and the West is portrayed as a cultural and political block from which all people are assumed to speak with a unified voice in defending these rights.

Certain foreign interventions are legitimized by portraying Uganda as a static country that is not going to develop on its own, and by reducing Ugandan gays and lesbians to passive and helpless victims. Instead of offering solutions for improving the situation of sexual minorities in her own country, Hillary Clinton announces a range of new initiatives by the Obama administration to protect human rights overseas, including a “Global Equality Fund”, implying that human rights and equality have to be fought for overseas, not in the US’s own backyard. Aid threats by some Western government are also inspired on the idea that Uganda is “the worst place to be gay”. These examples illustrate that the representation of a problem legitimizes certain policies and interventions while rendering other unnecessary.
Against African culture? - The Anti-Homosexuality Bill seen from a “dominant” Ugandan perspective

Hegemonic Ugandan representations of the debate often contain stereotypical beliefs about Western countries, which are associated with immoral, decadent and even ‘evil’ behavior. A great deal of this negative portrayal revolves around the sexual norms of the West, which are assumed to be ‘different’, ‘promiscuous’, ‘unnecessary’ and ‘dangerous’ when compared to Ugandan sexual norms. Homosexuality is believed to be originating in the West. Homosexuals are accused of engaging in deviant sexual behavior that is both destructive to them and to society. Homosexual behavior presumably leads to ‘anal ruptures’, ‘leaking assholes’, painful diseases and death. Homosexuals are also associated with different kinds of psychiatric problems, personality disorders and mental illnesses. They presumably do drugs or prostitute themselves. Homosexuals are also accused of posing as a threat to children. Homosexual behavior is hence portrayed as something exclusively negative; there is no mentioning of love, respect or pleasure between people of the same sex. Such images of an immoral and decadent West are indicative of an Occidentalist view of Western countries, in which modernity is seen as destructive to society.

In addition, Western countries are accused of not keeping ‘these practices to themselves’, but of trying to violently impose them upon Uganda. This can be seen in the attempts by sexual rights activists to promote homosexuality, as for example seen in sex-education in schools. The fact that this promotion material comes in the main from Western organizations, contributes to the idea that homosexuality is learned and that it is coming from the West. Moreover, the West is accused of abusing its hegemonic power in order to force homosexuality “down our throats” by making it a condition for development assistance. By linking homosexuality to Western imperialism, the debate contains a strong anti-Western dimension. It is therefore not surprising that the Western condemnation of the Bill and the aid threats made by some Western governments reinforce national sentiments. In a reaction to the international outrage that followed after the introduction of the Bill in 2009, Minister Buturo stated that:
There have been various reactions as well as over-reactions from countries which are annoyed at our independence to enact our laws. It is revealing that support to Uganda literally means that it is on condition that Uganda should do the bidding of givers of such support regardless of what Ugandans themselves think. It is also revealing that support which would benefit countless numbers of orphans, children and mothers can be withdrawn simply because Government is protecting its citizens against vices such as homosexuality (Uganda Media Centre, 2009).

Ugandan LGBT activists are generally portrayed as slaves of the West, who use homosexuality and gay activism as a source of income. They are assumed to receive considerable amounts of financial support from Western donors in return for engaging into homosexual practices and spreading it to others. Through such portrayals, it appears that proponents of the Anti-Homosexuality Bill are indirectly attacking the West. According to the National Taskforce Against Homosexuality, the Ugandan government fails to “protect our children and nation from sexual slavery and sexual colonization that homosexuals and their international masters are trying to impose on us.” The focus on “masters and slaves” shows that the debate is not only a fight against ‘the vice of homosexuality’ itself, but also about challenging Western dominance, moral superiority, and power abuse.

While the West is constructed as immoral, dangerous and imperialistic, Uganda is at the same time constructed as traditional and conservative, thus inherently different from the West. Uganda is generally associated with positive values, such as morality, decency, and dignity. A recurring feature in the debate is the notion of ‘African culture’, which is believed to be incompatible with homosexuality. Ugandans are assumed to engage in “normal” and “healthy” heterosexual behavior. Although it is acknowledged that homosexual behavior did take place on the continent, the practice was ‘certainly not accepted’. When asked why the majority of Ugandans are against homosexuality, Family Life Network director Stephen Langa responded:

Because it is something culturally repulsive to us. It is seen as a gross thing in our culture. Ugandans and Africans are repulsed by the whole idea of homosexuality. Anyone associated with homosexuality is revolting to our community.\(^2\)

According to Langa, homosexuality is un-African because every African would be repulsed by the idea. Such a view of “Africaness”, assumes that there is only one African culture, shared by all Africans without conflict, and one that does not evolve over time. However, historical and anthropological research has not only made it clear that homosexual behavior did take place on the African continent, but also that different cultures had different ways of responding to the practice (Tamale, 2011b; Murray and Roscoe, 1998). Although some African cultures punished homosexual behavior, other cultures did not pay attention to it or even celebrated it. Assuming one African culture ignores the fact that in Uganda alone there is a wide variety of cultures, and that these cultures are themselves dynamic.

The traditional culture of Uganda is also imagined by emphasizing family values. The best output from a family is when it is led by a father and a mother, because it will presumably lead to a balanced maturity and stability, among others. There is also a support for traditional gender roles, as expressed by the following article in the Observer:

In Africa and other generally conservative societies, there is a rigid boundary between what is masculine and what is feminine. A woman does not wear trousers, climb trees, whistle or have multiple sexual partners; a man may have two or more women but does not cry, step away from a dare, wear dresses. [...] Consequently, it is difficult for many of us to imagine a woman being romantically involved with a woman – she is supposed to be with a man; or a man lying with a man – he should be with a woman.

Here it is interesting to note that the focus is on an idealized Christian image of the family, even though polygamy and extended families are commonplace across the country. This possibly reflects the influence of American Right Wing evangelicals who have been active in promoting family values in the country (Kaoma, 2009). These portrayals of the ‘traditional family’ and ‘traditional gender roles’ furthermore deny the fact that these relationships are far more dynamic and subject to change. Put differently, the “rigid boundary between masculine and feminine” is not rigid at all.

Framing strategies

The analysis reveals that in order to mobilize participants, both proponents and opponents of the Anti-Homosexuality Bill use similar framing strategies, which are frame bridging, frame amplification, frame extension, and frame transformation (Snow et al., 1986). First of all, both proponents and opponents of gay rights use frame bridging in order to connect two sets of beliefs that are compatible but structurally unconnected. The linkage of sexuality into the human rights framework is a prime example. There is no inherent connection between sexuality and human rights. Nevertheless, sexual rights activists have increasingly used the human rights language to put new forms of perceived injustice on the agenda. Frame bridging is also used among opponents of gay rights, who frame homosexuality as unnatural and against African culture. Again, there is no inherent connection between religious and cultural values and attitudes towards homosexuality. Religions have no unequivocal stance on the issue of homosexuality, nor is “African culture” inherently inhospitable to people with same-sex attraction.

A second strategy is frame amplification, which is used to invigorate a frame and to emphasize the seriousness of the problem. Proponents of gay rights use this strategy to amplify the problem of human rights violations in Uganda and other developing countries. Values such as justice, equality, tolerance and dignity are articulated because they are presumed basic to potential audiences. There is also a selection of beliefs about the seriousness of the problems (e.g. murder, violence, and discrimination), stereotypical beliefs about antagonists (mainly Ugandans), and beliefs about the perceived urgency of the problem. Frame amplification is also used among opponents of gay rights in order to invigorate the problem of homosexuality in Uganda. Again, central attention is given to values that are presumed basic to Ugandan audiences, such as decency and morality. There is also a selection of beliefs about the seriousness of the problem, for example by stating that homosexuals pose a threat to the family, the children, and Ugandan culture. This practice of grouping together different kinds of presumed threats that homosexuals pose to society can also be seen as an example of frame amplification. The strategy also entails voicing stereotypical beliefs about antagonists (whereby Western countries are seen as imperialistic and gay activists are seen as their slaves) and beliefs about the perceived urgency of the problem.

A third frame alignment strategy that can be identified is frame extension. Sexuality and sexual diversity are not framed as an individual issue, but is seen to be affecting the society at
large. Proponents of gay rights argue that protecting the rights of gay people will not only lead to economic benefits, such as the strengthening of communities and the pursuit of new ideas, but also enhances the dignity and credibility of states. Put differently, any state that wants to be respected in the international domain should protect the rights of its homosexual citizens. By contrast, opponents of gay rights argue that allowing homosexuality will destroy the traditional culture of Uganda and poses a risk to its national sovereignty. Homosexuality is thus linked to the moral breakdown of society and is seen as a token of Western imperialism and dominance. The Anti-Homosexuality Bill forms a clear case in point. The proposed legislation is not only an attempt to further criminalize homosexuality (and thus to resist attempts by sexual rights activists to include it as a human right), but also an attempt to maintain the right to national sovereignty and cultural diversity.

Finally, *frame transformation* is as a strategy used to reframe a set of conditions into new values and meanings. This strategy is only found among the proponents of gay rights, and can be specified into two observations. On the one hand, we see that the status and treatment of gays and lesbians that was previously taken for granted is now reframed as problematic and in need of repair. Whereas the unequal treatment of homosexuals was previously seen as unfortunate but tolerable (and sometimes even justifiable), it is now defined as inexcusable and immoral. This is what Snow et al. (1986) have called a domain-specific transformation. On the other hand, we see the emergence of LGBT rights as a new masterframe. Same-sex sexuality is increasingly seen in terms of rights, whereas previous dominant ways of thinking regarded it as sinful behavior or a mental disease. It is important to note that this masterframe is still emerging and under contestation. Thus, while the ‘LGBT rights frame’ is increasingly gaining ascendance over other frames, it also competes with existing frames. This emergence of a new masterframe is what Snow et al. (1986) have called a global interpretive transformation.
Concluding observations

When we look at the first dynamic of norm creation, it becomes clear that both camps use similar framing strategies to polarize the debate. The result of this process is that both norms and actors become temporarily fixed into two opposite camps. At a first glance, the debate can easily be read as a site where two norms on homosexuality compete. On the one hand, there is the hegemonic idea that ‘gay rights are human rights’. On the other, homosexuality is seen as ‘unnatural’ or ‘un-African’. This practice of freezing a norm into a definition is what Lombardo, Meier and Verloo (2007) have called ‘fixing’. The authors state that fixing a norm might prevent reflexivity and form an obstacle for a norm to further evolve. This is also the case in the debate, where such fixing practices leave a lot of issues silent. For instance, while the concept ‘gay rights’ is increasingly taken for granted among a number of human rights activists, the link between homosexuality and sexuality is not straightforward but a very recent one, and therefore its universal applicability can be questioned. Also, by stating that homosexuality is un-African, one ignores the fact that same-sex sexuality did exist on the African continent even before the arrival of European settlers. Moreover, by fixing the norm into a definition, the diversity of positions towards the issue is ignored: both the West and Uganda are assumed to speak with a unified voice.

Another finding is that actor constellations are temporarily frozen into two opposite camps. I have shown that both proponents and opponents of gay rights use postcolonial language to amplify differences between the West and Africa, whereby the ‘Other’ is placed in a negative category. In hegemonic Western representations of the debate, Uganda is often constructed as inherently dangerous and inhospitable to gays and lesbians. This image is created by portraying the majority of Ugandans as religious and violent stereotypes, whereas Ugandan gays and lesbians are depicted as helpless victims without agency. Such homogenization leaves no room for the diversity of voices that can be found among the Ugandan public, and simply reduces the country to ‘the worst place to be gay’. At the same time, the West is constructed as inherently liberal, progressive and tolerant towards gay people. Such representations are equally simplistic because they ignore the fact that discrimination and violence towards gays and lesbians also exist in Western countries. By contrast, in hegemonic Ugandan representations of the debate, there is often an idealization of African culture. This ‘African culture’ is deemed to be traditional, static and homogeneous, but increasingly under attack by Western notions of sexual freedoms. The
analysis moreover points to the disciplining effect of discourse. The dominant perspective is presented as the only possible truth, whereas alternative ways of thinking are seen as ‘abnormal’, ‘illogical’, ‘vile’ or ‘barbaric’. These postcolonial dynamics result in binary oppositions of ‘us’ versus ‘them’, making debate seemingly more black and white than it really is.

The debate revolving Uganda’s Anti-Homosexuality Bill is not only a site where an international norm on gay rights is negotiated, but also a site where national identities and differences are constructed. By constructing the West as liberal and tolerant towards gay people, gay rights and sexual freedoms become articulated to the nation and serve as a marker of Western identity. By contrast, traditionalism and heterosexuality have become key features that define African nations. The West and Africa are thus constituted as mutually exclusive categories with different and opposing norms. Not only is the West portrayed as inherently different from Uganda, but there is at the same time a hierarchy constructed through the employment of negative words and racial stereotypes. Through suggesting that Western beliefs and values are superior, the debate is in fact a reproduction of many colonial stereotypes that keep unequal power relations firmly in place.

In addition to the construction of Western and African identities, the debate also forms a space where relations between countries are negotiated. The West’s emphasis on reaching a global consensus among states to accept gay rights reflects a worldview in which all countries follow the same path towards modernity. In this worldview, the West is placed “on the right side of history”, above a traditional Uganda that needs to be modernized according to Western human rights standards. By contrast, political voices from Uganda see these attempts to “reach a consensus” as exemplary of a neo-colonial attitude of the West, which is articulated in the language of ‘masters and slaves’. Voices that oppose the inclusion of same-sex sexuality into international treaties can therefore also be seen as a way of challenging Western imperialism and the view that all countries should follow the same path. The debate is thus also becomes a space for negotiating Uganda’s relationship to Western imperialism and the right to national sovereignty and cultural diversity.

The case shows that although both proponents and opponents of gay rights use similar framing strategies, the result of these strategies is not congruence building and complementarity, as dominant approaches in norm diffusion theory suggests. Instead, framing strategies have mainly served to amplify differences between the West and Uganda, and have increased
differences between international and domestic norms on homosexuality. Because framing strategies are embedded in postcolonial discourses, the reactions of domestic actors do not only concern the definition of the international norm, but also its hegemonic tendencies. Put differently, the norm ‘gay rights’ becomes a synonym for Western intervention and constitutes a threat to Uganda’s national identity and sovereignty. In addition, pressure from Western countries to accept gay rights might delegitimize the claims and work of LGBT organizations working in this field. Because hegemonic Ugandan voices portray gay activists as slaves from the West, they become discursively constituted as traitors of Ugandan culture. As a consequence, pressure ‘from above’ may also fuel hostility towards gays and lesbians in the country. The findings have important implications for our understanding of norm diffusion theory, namely that framing does not necessarily involve a process of ‘congruence building’ or persuasion of others. This case shows that the externalization of claims may also lead to dissonance, polarization and inequality between actors and norms. Framing strategies thus do not necessarily challenge dominant meanings, but may also consolidate and reinforce dominant perspectives and hence undermine the broad acceptance of a new norm.
6. Beyond dichotomies: Pluralizing the debate

In the previous chapter, I have shown how both proponents and opponents of the Anti-Homosexuality Bill use similar framing strategies to polarize the debate. However, while the debate is often represented as a battle between a pro-gay West and an anti-Uganda, a closer examination reveals that the picture is more complex. In this chapter, I examine in depth the second dynamic, which I have called ‘pluralization’. A first way to do this is by presenting the different transnational and domestic frames of homosexuality in order to show the plurality of voices. The frames are grouped together into a “human rights” camp and an “unnatural camp”. These clusters verify the idea that there are two camps, but at the same time they refute the claim that these camps are homogenous entities. These different frames make it clear that norms are dynamic and that actors constantly reposition themselves. I argue that the concept ‘frame alignment strategies’ developed by Snow et al. (1986) is insufficient to explain these dynamics of norm creation.

Transnational and domestic frames

1a. Gay rights are human rights

In this frame, violence and discrimination targeted at people based on their sexual orientation and gender identity are identified as the major problems. The central concepts here are ‘sexual orientation’ and ‘gender identity’, which are generally seen as a person’s innate and immutable characteristics, similar to sex and race. In other words, being gay is not a choice that can be reversed or a pathological condition that can be cured. Rather, people are ‘born’ gay which gives them a more or less stable identity. Because these characteristics are immutable, people with different sexual identities and sexual behavior should attract rights protection to express themselves. This view is most explicitly expressed in the claim that ‘gay rights are human rights’. Another way of using sexual rights is in arguing that existing human rights would, if properly applied, protect certain forms of sexual activity and expression. These rights include the right to marry and to found a family, and the right to non-discrimination, among others (Yogyakarta Principles, 2007).
The problem is experienced by gays, lesbians, bisexuals and transgender (LGBT) people, who are often found in developing countries where laws that criminalize homosexual behavior exist. Upon a closer look however, it appears that the problem is constructed to be affecting the society at large. One reason is that gays and lesbians, because of their sexual orientation, are deemed unable to fully develop their potential and therefore unable to contribute to the society: “There are costs to not protecting these rights, in both gay and straight lives lost to disease and violence, and the silencing of voices and views that would strengthen communities, in ideas never pursued by entrepreneurs who happen to be gay” (Clinton, 2011). In short, nations who protect the rights of LGBT people will flourish, whereas countries which do not protect these rights run the risk of missing out on possibilities to develop into a strong nation. A second reason is because homophobia threatens the dignity of states. The violation of the rights of gay and lesbians is deemed to affect the entire constitutional state and poses a threat to human rights in general. Consequently, any decent society is expected to protect the rights of its LGBT people.

At the state-level, governments are held responsible for imposing gender and sexuality norms on their citizens through discriminatory laws. Government authorities, such as the police, are accused of looking away or joining in the abuse. At the community-level, there are social, cultural and religious norms that prescribe how men and women should behave. Churches are seen as a key actor instigating hate towards gays and lesbians in their countries, because they allegedly regard homosexuality as unnatural and sinful. At the individual level, fellow citizens that do not accept their friends, family and colleagues for what they are, are held responsible. Sometimes specific groups of individuals, such as American evangelicals are blamed for instigating homophobia in countries like Uganda.

According to the gay rights frame, the problem can be solved by reaching a global consensus that recognizes the human rights of LGBT citizens everywhere. Such a consensus must ensure that all people are treated equally and with dignity, no matter one’s sexual orientation or gender identity. At the transnational level, a resolution that includes the right to sexual identity and sexual orientation should be developed. In this way, norm-violating states can be held accountable for their behavior while rights of LGBT people worldwide can be protected. At the state level, laws that discriminate against gay people should be removed, because “laws have a teaching effect” (Clinton, 2011) At the societal level, changes in cultural attitudes towards homosexuality are necessary. The emphasis should be on understanding, conversation, and a
“willingness to walk a mile in someone else’s shoes” (ibid). To solve the problem, each and everyone is deemed to have a responsibility. LGBT people must help lead the effort, because they are assumed to have invaluable knowledge, experience, and courage (Clinton, 2011). Human rights bodies should continue their attempts to establish a binding agreement that protects the rights of gays and lesbians worldwide. Leaders of countries where people are being persecuted for their sexual orientation should safeguard the dignity of all their citizens and persuade their people to do the same. Finally, common people of all nations should treat gays with respect.

1b. Human rights violations

The second human rights frame is often found among Ugandan human rights organizations and LGBT people, which makes it a more domestic frame of homosexuality. According to this frame, human rights violations targeted towards Ugandan gays, lesbians and transgender people are the main problem. These include human rights violations with regard to the right to privacy, to health, to be free from violence, to education, and to freedom of expression and movement. It is important to note that not all human rights organizations recognize the idea of a ‘sexual orientation’ or ‘sexual identity’, but that they apply basic human rights principles to gays and lesbians, irrespective of the question if it is an innate condition or a choice. Some LGBT activists use the word ‘Kuchu’, derived from Swahili, to identify themselves both as LGBT and as African (and possibly to counter the claim that homosexuality is un-African). This suggests that “sexual identity” and “sexual orientation” are categories developed in the West and that these categorizations may not be the experienced in the same way in Uganda (Weeks, 1981; D’Emilio, 1993).

The problem is experienced by gays, lesbians, and transgender people, who face violations of their basic human rights. Some suffer from psychological problems because they are afraid to come out and have to hide who they are from friends, family and counselors. According to activists, there have been cases of self-mutilation and suicide in Uganda. But again the problem is constructed to affect a larger segment of society. For example, the Anti-Homosexuality Bill forces people to report friends and family who are suspected of homosexuality to the police. The bill would also require breach of trust and confidentiality of parents, priests, doctors or lawyers who may be approached by homosexuals, otherwise they
would be arrested. Prohibiting the disseminating of information and the licensing of LGBT organizations is a form of censorship that would affect media, donors, academics, and non-governmental organization, among others. Thus, the Bill infringes upon other principles and norms, such as human rights, confidentiality, and censorship.

The causes of human rights violations are mainly attributed to homophobia, sex and gender norms, and ignorance of the general public. Responsible actors are the state and segments of the public, some evangelical churches, American evangelicals, and the media. The Anti-Homosexuality Bill has allegedly increased the threat for gays and lesbians. Also, some Ugandan media who have revealed the identity of gays and lesbians (such as the Red Pepper and the Rolling Stone) are accused of instigating hate and violence towards LGBT people in Uganda. The problem can be solved by dropping the Anti-Homosexuality Bill from parliament. Meanwhile, the public must be informed about same-sex attraction, for example by disseminating information and by teaching doctors about health needs. Gays, lesbians and transgender people need to be empowered by offering support and counseling. The problem should be solved by the Ugandan Parliament, who should drop the Bill. Furthermore, human rights organizations and donors are seen as key actors to solve the problem.

2a. Against the will of God

According to this frame, homosexuality is unnatural, sinful, and against the will of God. It starts from the Biblical premise that God created Adam and Eve, and that sexuality is only allowed between a man and a woman and within the confines of marriage. All sex outside marriage is sinful, and therefore any decent society should reject it. Because God has not created homosexuality, homosexuality does not form any part of God’s design for human beings and therefore it must be unnatural. According to this view, ‘sexual orientation’ cannot be an identity, because “ultimately, the identity of each person is identified by Christ” (Lambeth Conference, 1998). The Anglican community therefore warns “against constructing any other ground for our identities than the redeemed humanity given to use in him, [because] our sexual affection can no more define who we are than our class, race, or nationality” (ibid). The idea that people are ‘born’ gay is thus rejected, because it was not given to us by God.

The problem is seen to be affecting people with same-sex attraction, because they may suffer from homophobia and discrimination. More importantly however, is the fact that
homosexual activities may be “a barrier to the Kingdom of God” (Lambeth Conference, 1998). The causes of homosexuality are deemed to originate in sin. If homosexuality is not ‘natural’, it follows that engaging in homosexual behavior needs to be a choice, more specifically the wrong choice. Such immoral choices may occur because people are ‘endowed with a complex variety of emotional potentialities and threatened by a complex variety of forms of alienation’ (Lambeth Conference, 1998). In other words, people may engage in homosexual behavior because they are tempted by sin and because ‘the flesh is weak’. By understanding homosexuality as a choice, this frame rejects the human rights argument that gays and lesbians can claim rights.

The problem can be solved by prohibiting same-sex behavior. The legalization of same-sex marriage must be discouraged, because marriage is only possible when it is contracted between a man and a woman. In addition, it must be ensured that homosexuality and gender identity are excluded as human rights. To solve the problem, churches take centre stage. Although the Church condemns homosexuality, it equally teaches the message of respect and compassion. Therefore, churches should be a safe haven for people who struggle with their sexual orientation, and the Church and its members must work to assure that homosexuals receive compassion and care. The Church can furthermore offer counseling to heal homosexuals from their homosexual orientation, and must work to end any discrimination on the basis of sexual orientation and to oppose homophobia (Lambeth Conference, 1998). However, homosexuality remains sinful and must be discouraged. Hence, the state must ensure that marriage is only allowed between a man and a woman.

2b. Homosexuality is Un-African

According to this frame, homosexuality is a foreign and abominable lifestyle that is being forced upon Uganda by Western powers. The frame centers around claims that homosexuality is against African culture, and that “Uganda must uphold its values as they relate to human sexuality” (Church of Uganda, 2010). In the construction of the frame, homosexuality is often associated with “abnormal” sexual practices that are assumed to pertain to Western countries. Homosexual sex (often reduced to male same-sex behavior) is portrayed as perverse, promiscuous and dangerous, in short, as “bad sex”. Ugandan sexuality, by contrast, is constructed as ‘normal’ and ‘safe’ heterosexual sex that takes place within the confines of marriage. The focus on deviant
sexual behavior can be seen in the following statement by the Ugandan Minister for Ethics and IntegrityNsaba Buturo, who said:

The people of Uganda believe that practicing anal sex at the expense of heterosexual sex is not a normal practice. Ugandans know or believe that homosexuality involves practices that are dangerous and high risk to the human body which is designed for heterosexual functions. Ugandans also believe that anal sexual intercourse, foreign objects used in sexual intercourse and promiscuity do not deserve to be defended at all. [...] The majority of Ugandans hate to see the promotion of illegalities that they consider as dysfunctional, abnormal and unhealthy (Uganda Media Centre, 2009)

Homosexuality is not only seen as alien, dysfunctional, unhealthy and immoral, but also as something that is brought in under pressure and undermines Uganda’s ability to govern itself. Several governmental and non-governmental organizations accuse the West for showing an imperialistic and neocolonial attitude. For example, the Ugandan government is called upon to protect the nation from “sexual slavery and sexual colonization that homosexuals and their international masters are trying to impose on us” (Family Life Network, 2011). The “various reactions as well as over-reactions” that the Anti-Homosexuality Bill generated are a sign that Western countries “are annoyed at our independence to enact our laws” (Uganda Media Centre, 2009). Although the threats to cut aid to Uganda are seen as “very wrong”, it is also stated that “the West can keep its money if it comes with strings attached” and that Uganda will not trade its traditional morals and values for a culture of Western promiscuity (personal interview Family Life Network). Thus, in addition to protecting the traditional culture of Uganda, the hegemonic power of the West is also challenged.

The problem is seen to be affecting Ugandan society in two ways. First, the traditional Ugandan society is under influence by deviant sexual norms. This is perceived as dangerous, because Uganda is losing its traditional values and is changing into something alien and unwanted. A second important problem is that the nation is denied national sovereignty. By threatening to cut aid if Uganda does not “respect the human rights of gay people” the country feels forced to change its values in return for money. Several individuals and organizations are held responsible for promoting homosexuality in Uganda, and are accused of using financial and diplomatic instruments to do so. “The UN, national governments, financial institutions, private
companies, NGOs, etc. have become spokespersons of the gay movement and daily use official resources to promote the gay agenda and to arm-twist anyone who opposes this agenda” (The National Taskforce Against Homosexuality). The promotion of homosexuality is also seen in the increasing visibility of gay activists in the country who demand their rights to be recognized. The fact that these activists are often funded by Western donors contributes to the idea that ‘gay rights’ is a foreign concept. LGBT activists are accused of taking advantage of the Western concern with gay rights, and are suspected of having engaged into sexual rights activism because it is a source of income.

The problem can be solved by prohibiting same-sex relations. This can be established by keeping laws that criminalize same-sex behavior in place, and even toughen the law. However, such a law would be difficult to enforce as one cannot monitor behavior that takes place in the bedroom. Some have therefore argued that such a law is merely intended as a warning that homosexual behavior is bad and to keep such practices from ‘the public eye’. A second solution is to prohibit the promotion of homosexuality in Uganda. With regard to the international level, this means prohibiting the ratification of any international treaties, conventions, protocols, agreements and declarations that see homosexuality as a human right. Existing international legal instruments, whose provisions are contradictory to the Anti-Homosexuality Bill, should be declared “null and void to the extent of their inconsistency” (Anti-Homosexuality Bill, 2009). It is furthermore stated that “definitions of “sexual orientation”, “sexual rights”, “sexual minorities”, “gender identity” shall not be used in any way to legitimize homosexuality, gender identity disorders and related practices in Uganda” (ibid). The promotion of homosexuality by foreign governments and NGOs can be halted by prohibiting the dissemination of information and funding of organizations in Uganda, among others. Those who continue their activities will be punished with imprisonment and/or a fine. It also means saying no to aid when the acceptance of gay rights becomes a condition for development assistance. Within Uganda, organizations that promote homosexuality should be prohibited. The problem can be solved by the Ugandan

30 The focus on the promotion of homosexuality forms an interesting parallel with the Global Gag Rule, a former US policy that was first introduced by Ronald Reagan in 1984, rescinded by Bill Clinton in 1993, reintroduced by George W. Bush in 2001, and rescinded again by Barack Obama in 2009. The Global Gag Rule required non-governmental organizations to “agree as a condition of their receipt of U.S. federal funds” that they would not use their own non-U.S. funds to provide information, referrals or services for legal abortion or advocate for the legalization of abortion in their countries.
parliament, who needs to pass the bill, and by government authorities, who need to enforce the
law.

2c. Threat to the family
According to this frame, homosexuality poses a threat to the traditional heterosexual family. This view is grounded in Christian notions that God created man and woman and that heterosexual relationships are therefore the “natural way”. Procreative sex within marriage is regarded as the most desirable because it constitutes the basis of a family, and hence of life itself. In addition to homosexuality, the family is also deemed to be under threat by other ‘moral hazards’ that include prostitution, drug abuse, abortion and pornography. In the construction of the frame, the nuclear family consisting of a mother, a father, and siblings is seen as the most natural. The frame also contains conservative notions about masculinity and femininity and supports traditional roles for men and women in the household. For example, the ‘natural’ role for the father is to lead the family and to provide for them, while mothers are assumed to take care of the children. Both sets of roles are seen as complementary and necessary in a child’s upbringing.

The problem is experienced by families and society. A child raised by two parents of the same sex will be confused about his or her natural role to carry out. Homosexuality is thus seen to threaten the ‘natural’ division between men and women and the roles assigned to each member in the household. This ignores the fact that family relations are more dynamic, and that many ‘broken homes’ can also be found among heterosexual families. Homosexuality is also seen to destroy the moral fabric of society as a whole. Societies that allow homosexuality are considered dysfunctional and more prone to violence and conflict. The United States, where anti-homosexuality laws have been removed in all states, are often cited as an example of the moral breakdown of society. The United States, and the Western world as a whole, are seen to be losing the battle against the powerful gay lobby, which is why other countries (such as Uganda) must be protected from facing the same faith. The problem is caused by the so-called ‘global gay agenda’ that pursues a culture of sexual promiscuity and deviant sexuality. Responsible actors are gay activists, whose goal for society is “to replace Judeo-Christian sexual morality (monogamous heterosexual marriage and the natural family) with an alternative moral system that embraces “sexual freedom” (Lively, 2009). Because gays could not legally marry, they have aimed to
“destroy marriage-based culture” by promoting a culture of sexual promiscuity and fostering hostility against the Church.

To solve the problem, states must prevent the legalization of same sex marriage and/or keep existing anti-homosexuality laws in place. Laws that criminalize same-sex behavior are seen as necessary because they discourage people from engaging in homosexual acts. Life imprisonment and the death penalty are generally considered too harsh, both among Ugandan and American proponents of a ‘pro-family’ legislation, but are sometimes seen as necessary to ‘send a moral message’. Instead, the focus should be on stopping the promotion of homosexuality. Pro-family advocates need to fight the gay agenda by teaching the values of traditional marriage. In addition, children must be learned at an early age to see marriage as their ultimate goal.

2d. Disease, sexual violence and crime

According to this frame, homosexuality is a dangerous lifestyle associated with life-threatening diseases and psychiatric conditions. They are assumed to lead a more dangerous and promiscuous lifestyle than heterosexuals. Homosexuality is also associated with a variety of health problems, including anal ruptures, HIV/AIDS and a shorter life span. Sometimes, AIDS is even seen as a punishment by God. Christian pro-family movements also argue that homosexuals are more likely to molest children than heterosexuals, often by referring to “scientific” studies that perpetuate the construction of homosexuality as a mental disease31. In addition, homosexuals are accused of recruiting children into a homosexual lifestyle. Because homosexuality is not regarded as an inherent characteristic, children are seen as vulnerable and subject to persuasion by gays. By linking homosexuality to AIDS and pedophilia, anti-gay movements draw attention to the threat homosexuality poses to the society at large. By portraying homosexuality as a threat to children, the threat is also directed towards families. In addition, by portraying AIDS as a gay

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31 American psychologist Paul Cameron is frequently cited among pro-family movements who oppose the fight for equal rights of gay people. Cameron is chairman of the Family Research Institute, a Christian organization whose mission it is “to generate empirical research on issues that threaten the traditional family, particularly homosexuality, AIDS, sexual social policy, and drug abuse”. In his papers, Cameron has claimed that homosexuals pose a threat to public health and social order (1989) and the well-being of children (1986). His studies have been criticized for being at odds with scientific standards, and in 1983, Cameron was expelled from the American Psychological Association for violating the Ethical Principles of Psychologists. The Family Research Institute has furthermore been labeled a ‘hate-group’ by the Southern Poverty Law Centre, a civil rights organization that seeks to “expose the activities of hate-groups” and to “promote justice and equality for minority groups”.

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disease that will keep spreading unless something is done to stop homosexuality, AIDS is framed as a threat to the public health of society. The frame is particularly strong among right-wing evangelical movements. The victims are children, who run the risk of being molested by homosexuals or recruited into a homosexual lifestyle; families, whose children run the risk of being molested or seduced into a homosexual lifestyle; society, who witnesses the rapid spread of AIDS and moral degradation. And last but not least, the homosexuals themselves, who suffer from mental illness and deadly diseases and who are deprived of love and warmth.

In the frame, homosexuality is the result of psychiatric problems, which may be caused by sexual abuse by other homosexual men at a young age. Another cause might be that homosexuals come from dysfunctional families and develop personality disorders because they did not receive adequate love from their parents or traditional upbringing. The problem can be solved by offering ex-gay therapy to homosexuals. To reduce the risk that homosexuality poses to society, states must prohibit the legalization of same-sex marriage and establish laws that criminalize same sex behavior.

2e. Protect the children

According to this frame, homosexuals target innocent children in two major ways, namely by sexual abuse and by recruitment. In this frame, homosexuals are often equated with pedophiles and are assumed to have a higher risk to molest children than heterosexuals. Moreover, there is allegedly no justice for children, because the current law is not comprehensive enough. “The law says that if someone defiles a girl child, the maximum punishment is death, but if a man defiles a boy, the law is silent about it.” Meanwhile, “the molestation, recruitment and defilement of our children are still going on unabated” (The Family Life Network, 2011). Homosexuals are also believed to recruit children and youth into homosexual behavior with inducements including

32 While the argument that homosexuals pose a threat to children also occurs in the frame on sexual violence and crime, I consider it important to reconstruct a separate frame based on children’s safety. One important reason is that this frame touches upon a broader concern within Ugandan society. There have been cases of child defilement and child sacrifice in the country, and the recent conflict in the North of Uganda between the Lord’s Resistance Army and government troops involved the abduction and abuse of children. In the Ugandan context, the vulnerability of children and the violence and abuse directed against them thus constitute a real threat.

33 http://www.independent.co.ug/index.php/component/content/article/106-myblog/2467-bahati-still-strong-despite-international-pressure-to-drop-bill While some proponents of the Anti-Homosexuality Bill have defended it on ground that it fills the gaps in existing legislation, others have stated that the current law is already comprehensive enough (tamale, civil society coalition)
money and status goods. They are accused of taking advantage of poverty and high unemployment rates in the country to recruit the youth into their organizations.

The people affected are the children and youth of Uganda. Because homosexuality is not seen as innate, it must be learned. Children are especially vulnerable as they cannot defend themselves or are easily lured into ‘deviant’ sexual behavior. Moreover, the threat is seen to be affecting Ugandan society at large. By targeting children, homosexuals also threaten the future of Uganda by destroying the morals of kids and hence, the moral fiber of the entire nation. Allegedly, this has also happened in Western countries, who are accused of showing lax attitude towards homosexuality while their children “were misinformed and recruited into homosexuality by powerful and well funded organizations” (National Taskforce Against Homosexuality, 2010).

The problem of rape and defilement is caused by homosexuals who are believed to have a higher risk to molest children. Homosexuals are also accused of recruiting children into their lifestyle. Homosexuals and activists are assumed to take advantage of the high poverty rates in Uganda by enticing youth with (foreign) money to engage in homosexuality. There is often a reduction of same-sex attraction to male homosexuality. In particular men are seen as sexual perverts and perpetuators of violence.

The problem of rape and defilement can be solved by ensuring the protection of children. Some of the proponents of the Bill have defended it on grounds that it fills the gaps in existing legislation. The definition of rape in the Penal Code only refers to cases where women or girls are involved, and therefore some see it as necessary to include men and boys to ensure equal protection. It is furthermore argued that the provision for the death penalty to rapists of girls and women is a law about which “no one has complained that it is unchristian or a human right violation” (National Taskforce Against Homosexuality, 2010). In addition, because some school officials have failed to report cases of sexual abuse to the police, the Anti-Homosexuality Bill aims to make the reporting of offences within 24 hours mandatory. The problem of children being recruited into homosexuality can be solved by prohibiting the promotion of homosexuality, so that children cannot be lured into the practice. The government should enact law. The police should prosecute those who molest and entice children into homosexuality. Children who accuse people of molesting them should be protected. They must also learn to resist advances and enticements by homosexuals.
Beyond dichotomies

The frames discussed in the previous section form a starting point for investigating in more detail the dynamics of norm creation. In the remainder of this chapter, I want to make a number of additional observations that create space to move beyond dichotomies. A first important observation is that there is a plurality of positions. Among the actors who engage in the debate, there are different views on what the problem is, who is seen to be affected by it, what is seen to have caused the problem, and what the solution or solutions should be. While some religious actors support the Anti-Homosexuality Bill, others consider it too harsh. Yet there are also religious individuals, such as Bishop Christopher Ssenyonjo and Archbishop Desmond Tutu, who openly support the fight for LGBT rights. Thus, while the debate is commonly perceived of as a debate between proponents and opponents of gay rights, these camps are not homogenous entities and they contain many different voices. In addition, there are segments of Ugandan society where tolerance and acceptance towards gays and lesbians can be found. One activist explained:

What the Western media have done is over-exaggerating the stories. Yes, there are cases whereby some homosexuals are being kicked out of their homes, [who are] kicked out of their households by their landlord, [or who are] kicked out of their jobs. Discrimination is there. And it’s really there. But what the mass Western media doesn’t talk about is, however much there is discrimination, there are other parts of society that are tolerant. People who understand, you know. And apart from that, another thing I realized… They are giving Uganda this picture whereby, if you are a homosexual from let's say Europe, and you wanted to have your holiday in Uganda, you would fear coming. And yet, we do have gay friendly bars, we go out and hang out with activists and other people in the community, we go and have a drink, we go for dancing, we go for social parties, and we enjoy ourselves. We have a life. We are not always in hiding (Icebreakers, personal interview).

This tolerance is often “silent”, which means that most people will not openly support same-sex sexuality. As Epprecht (2011) has noted, many African societies have rules that prescribe that one should not talk about (same-sex) sexuality. A number of respondents have stated that they do not have a problem with homosexuality, as long as it remains a private and secret matter.

34 While it is possible to analytically distinguish between frames, actors in the debate often ‘mix and match’ them in an attempt to advance their political goals. Actors may thus strategically use frames by combining several frames into one. This can also be seen as a strategy to polarize the debate.
Other respondents openly question the priority given to gay rights in international political discussions. A number of actors, including human rights activists, have accused Western governments for showing unequal attention for LGBT rights. They point out that Uganda is facing more urgent problems that include poverty, food security, criminality, unemployment, domestic violence and health problems. For the majority of Ugandans, homosexuality is thus not the ‘hottest’ topic. One respondent openly questioned the urgency of the Anti-Homosexuality Bill when she said: “It’s just a bill. Yes, it is unconstitutional and we are fighting it, but there are other issues as well” (Ugandan Human Rights Commission, personal interview). Another respondent, who works as a fundraiser in a human rights organization, complained about having a hard time finding support for other human rights issues: “A lot of funding comes to LGBT. It’s such a hot topic that everybody wants to support that. Which is a good thing; it’s just a shame if people don’t want to support other issues which are just as important” (East and Horn of Africa Human Rights Defenders Project, personal interview).

These quotes illustrate the hegemonic tendencies of an international norm on LGBT rights and the agenda-setting of the West. While equal rights for gays and lesbians might be on the list of social problems, for the majority of Ugandans it is not a priority. The analysis also highlights the importance of identifying silences in the frames, because social and economic inequalities might exclude some people from defining the problem and solutions (Carpenter, 2007). It appears that the most dominant voices that are heard in the debate are the people that also have the power to speak on behalf of ‘their people’. As a consequence, many other voices are not heard.

A second observation is that the norm ‘sexual rights’ or ‘LGBT rights’ is not unequivocally defined. Rather, there are diverse ideas about what these rights should entail, and the term ‘sexual rights’ is used in numerous ways for human rights claims. One way of using sexual rights is in claims that it is about the right to choose with whom you have sex, and the right to marry and found a family. Another way is in arguments that existing rights would, if applied, protect certain forms of sexual activities and expressions. The Yogyakarta Principles for example, is an attempt to apply human rights standards to address the abuse of LGBT people. By contrast, other human rights organizations have argued that human rights for everybody are

already captured in the Universal Declaration of Human Rights, and as such there is no need to include special references to sexuality:

What is annoying some people very much and what is creating the whole debate is that certain people are promoting [homosexuality] as a right: “It is my right to practice homosexuality.” That is what is creating a lot of discomfort and discontent amongst the people. They say: “How can you say it is a right? It’s not written anywhere.” So I think that is where the debate is coming from. And I also think that the different actors and the different organizations who are trying to promote it are not conceptualizing it in a right manner. But for us, […] we want to promote the rights of everyone, irrespective of what they prefer or who they are. We promote the rights of everyone. So we shall not discriminate. That is why we promote their rights in terms of what is really theirs (HURINET-Uganda, personal interview).

Thus, HURINET does not see homosexuality as a human right, but the organization protects the right of people in terms of ‘what is really theirs’, in other words, those rights that are laid down into binding human rights documents. From this angle, those clauses in the Anti-Homosexuality Bill that are unconstitutional or against the Universal Declaration of Human Rights can be addressed. For example, the prohibition of homosexuality is a violation of the right to privacy and to equality as well as non-discrimination (Ugandan Human Rights Commission, 2009). The clause that prohibits the promotion of homosexuality is a violation of the rights to freedom of speech, expression, association, and assembly. (ibid). Ugandan LGBT activists have also noted the vagueness of the concept ‘gay rights’:

I don't believe there is anything like gay rights. However much we use that term, like LGBT rights, we want our rights, we want our rights… No. The real rights we want are our birth rights. We are Africans, we are Ugandans, and we don't want to be treated as second class citizens. We want to be treated equally as the other people. Just like any other human being (Icebreakers, personal interview).

Everybody is entitled to human rights: the right to security, life, education, housing... It’s about basic rights. The political term is ‘gay rights’, but I don’t believe in gay rights. And I think that is what is not coming out clearly to people (Sexual Minorities Uganda, personal Interview).
These two quotes illustrate what a number of scholars have already observed, namely the fact that human rights is not only a tool of struggle, but also a site of struggle (Miller and Vance, 2004). Although ‘human rights’ are recognized as a core international norm in global discussions, Zwingel (2012) argues that the assumption that these norms are unequivocally defined is problematic. Rather, the human rights framework must be seen as an evolving concept in which not all dimensions are equally accepted. In this respect, it must also be noted that sexual identity rights have only recently been formulated based on new experiences of injustice. As a consequence, there exist multiple interpretations of what these rights entail, and opinions differ with regard to the questions if and how human rights and sexuality should be combined.

Because actors and positions are in constant flux, actor constellations are also dynamic. At least four actor constellations can be found. First of all, the norm that homosexuality should be included into the human rights framework resonates among a number of Western governments and NGOs, as well as some human rights organizations in Uganda. Secondly, the norm that homosexuality is unnatural resonates among American evangelicals, Western churches, and the majority of Ugandans. But also less straightforward coalitions can be found. A surprising actor constellation can be found among opponents and proponents of gay rights in Uganda, who both contend that Uganda should be able to exercise its sovereignty. Following the aid threats made by David Cameron in 2011, a number of African social justice activists released a statement in which they said that:

The history of colonialism and sexuality cannot be overlooked when seeking solutions to this issue. The colonial legacy of the British Empire in the form of laws that criminalize same-sex continues to serve as the legal foundation for the persecution of LGBTI people throughout the Commonwealth. In seeking solutions to the multi-faceted violations facing LGBTI people across Africa, old approaches and ways of engaging into our continent have to be stopped. New ways of engaging that have the protection of human rights at their core have to recognize the importance of consulting the affected.

A final actor constellation can be found between (pro-family) American evangelicals and (pro-gay) Western donors, who both think The Anti-Homosexuality Bill is unjust, unnecessary and immoral.
Framing strategies

The fact that both actors and norms become fluid and heterogeneous suggests that there are other framing strategies at work. While some actors attempt to polarize the debate into two opposite camps, the analysis also reveals that actors try ‘soften’ these fixed and indeed often negative categories. A clear example comes from a number of Ugandan churches, who have frequently been accused of “instigating hate towards homosexuals” and of “supporting the hanging of gays”. A few months after the Anti-Homosexuality Bill was tabled for the first time in Parliament, the Ugandan Catholic Bishops released a statement in which they said:

Church teaching remains that homosexual acts are immoral and are violations of divine and natural law. […] However, the Church equally teaches the Christian message of respect, compassion, and sensitivity. The Church has always asked its followers to hate the sin but to love the sinner. […] Homosexuals have the need of conversion and repentance. They also need support, understanding and love as all strive to be members of the Kingdom of God. The recent tabled Anti-Homosexuality Bill does not pass a test of a Christian caring approach to this issue. The targeting of the sinner, not the sin, is the core flaw of the proposed Bill (Statement Catholic Bishops of Uganda, 2009).

This statement can be read as an attempt to clarify the Church’s position on sexuality and to reject the view that churches are simply homophobic. While the church condemns homosexuality as sinful behaviour, the church remains a safe place for gays and lesbians. The American evangelicals, who have frequently been accused of playing a key role in writing the Anti-Homosexuality Bill, have also publicly released statement in which they distanced themselves from the Bill. Scott Lively said: “My purpose in addressing members of the Ugandan parliament in March was to urge them to emphasize therapy, not punishment in their anti-homosexuality law”36. Thus, while Lively supports a law that criminalizes homosexuality, this law should only be used to “actively discourage homosexuality […] to prevent its public advocacy.” Similarly, Germany announced that it had decided not to cut aid, because the country has been convinced by activists that aid threats do not produce the desired effects. This statement can be seen as a reaction to the accusation that the West is showing an imperialistic and neo-colonial attitude. The three examples have in common the fact that all actors react to the dichotomy by negotiating

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their way out of fixed and indeed often negative categories. This suggests that these positions are not fixed, but in constant flux. The possible positions towards homosexuality can therefore be seen as a continuum on which actors continuously (re)position themselves. The concept of ‘framing strategies’ is insufficient to adequately explain these dynamics. These framing strategies are not about alignment, but about redefining one’s own position and negating fixed categories, a process which I have called ‘softening’.

Concluding observations
In this chapter, I have aimed to move beyond dichotomies by bringing the plurality of voices back in. The analysis shows that both norms and actors become fluid and heterogeneous, and dichotomies fall apart. As a first step, I have presented the different frames that can be mobilized in the debate. These frames allow for making a number of additional observations that create space to move beyond binary opposites. Three main observations stand out. First of all, there is a plurality of voices that can be distinguished in the debate. While the debate is commonly represented as a war of binary oppositions, a closer examination reveals that there are many different perspectives on the issue. These positions towards homosexuality are not fixed, but in constant flux. Secondly, it is not unequivocal what gay rights are. Instead, the human rights framework is contentious and work in progress. Thirdly, the fact that both actors and norms are fluid and heterogeneous suggests different framings strategies. Although some dominant groups polarize the debate into fixed categories, at the same time actors also try to negotiate their way out of these categories, a process which I have called ‘softening’. For example, while the church is often discursively redressed as gay hater, the churches themselves emphasize compassion and respect. Another example is the decision of the German governments not to cut aid to Uganda because it is seen as imperialistic. These strategies are not (only) used to persuade others, but also to soften dichotomies. It might therefore be more appropriate to conceive of the debate as a continuum on which actors continuously reposition themselves and in which multiple actor constellations are possible.

What do these observations tell us about the dynamics of norm creation? First and foremost, the fact that both norms and actors are fluid and heterogeneous suggests that norm diffusion is not a process with clearly defined sources and trajectories. Instead, norm diffusion must be seen as an ongoing process of negotiation in which various actors from different
contexts are involved, and in which transnational dynamics play an important role. The diversity and fluidity of actors makes it inappropriate to conceive of the global system as a number of norm-abiding states versus a number of norm-violating states that need to be socialized into desired behavior. States are not inherently abiding or violating towards a norm, but contain many different perspectives, even when these norms are consolidated into law. The reason is that norms are highly ambiguous, contentious and therefore work in progress. Negotiations over the definition of human rights norms can result in a temporal definition, which gives them a semblance of permanency (e.g. ‘gay rights are human rights’). At the same time however, fixing a norm also creates new opportunities for negotiating its definition, for example in claims that it is not about special rights, but rather about the rights to privacy and to housing. While framing is crucial for norm negotiations, I contend that the concept of ‘frame alignment strategies’ is insufficient for understanding how norms are negotiated. It is not only about the amplification, bridging, extension or transformation of frames. Rather, norm negotiations must be seen as a ongoing process wherein actors constantly reposition themselves. New concepts may need to be developed to explain the framing strategies in these ongoing dynamics of norm creation.
7. Conclusion

In this thesis, I have investigated the framing strategies used by various domestic and transnational actors in the debate revolving Uganda’s Anti-Homosexuality Bill. This debate was unfolded in the context of transnational sexual rights activism, where activists have increasingly attempted to include issues of sexuality and gender identity into the human rights framework. The most significant step in that direction was the development of the Yogyakarta Principles in 2007. However, issues of gender identity and sexual rights are contentious in both international and domestic discussions, and it is yet to be seen if and when an international norm on LGBT rights will be consolidated into binding human rights documents. The theoretical background to this study is shaped by combining insights from norm diffusion, postcolonial thinking and sexuality studies. Central questions in norm diffusion theory are how international norms emerge, how they become meaningful and which actors translate and promote them. Early thinking in norm diffusion has focused much attention on the “causal mechanism by which norms spread” (Finnemore and Sikkink 1998: 4). A central role is conferred to the persuasive capabilities of transnational advocacy networks. It is assumed that the broad acceptance of an international norm crucially depends on the formation of transnational coalitions and putting pressure on states (e.g. Tarrow, 2006). Recent work however points out that norm negotiations are open processes of negotiations in which various actors from different contexts are involved (Krook and True, 2010). Instead of seeing norm diffusion as a linear top-down process, these scholars attribute a more prominent role to domestic actors who actively engage in the process. The focus however has largely remained on the positive aspects of norm diffusion. For example, Acharya (2004) has argued that domestic actors borrow and modify “external” norms in accordance with local beliefs and experiences. This degree of congruence building will influence the degree of acceptance or rejection towards the new norm.

In this study, I have shifted the focus from congruence building to possible negative dynamics norm negotiations. I argue that questions of power and dominance need to be taken into account when analyzing the dynamics of norm creation. The position of the West in the world gives it an ability to set the agenda and to determine the priority of social problems (Arnfred, 2004). As a result, norm creation often has a hegemonic character, from which most of the voices in the world are excluded. Reactions of local actors towards an international norm
might then not only concern its definition, but also its hegemonic tendencies. By infusing a postcolonial perspective in norm diffusion theory, I have attempted to bring these power dynamics back in. Insights from sexuality studies were included to show the ways in which Western discourses on sexuality have changed in the last years, at the same time when these new ways of thinking have gained a new ‘taken for granted status’. Sexuality is by definition a postcolonial subject, as it is often articulated to national identities.

Critical frame analysis was used to study the ways in which the debate is represented by different stakeholders. This methodology starts from the assumption that social problems are not objective truths that exist ‘out there’, but rather interpretations or representations of what different actors think the problem is about. Frames typically consist of a diagnosis (what is seen to be the problem?) and a prognosis (what is seen to be the solution?). In addition, there are often implicit or explicit representations of who is deemed to be affected by the problem, who is seen to have caused the problem, and who should solve it. It is also relevant to identify who has a voice in the framing activity, because some people may be excluded from defining the problem and solution. These different ways of framing an issue can in turn have real material consequences, such as writing a piece of legislation or aid threats if a country does not respect ‘gay rights’. To analyze the ways in which these frames are mobilized in the debate, I was inspired by the concept of ‘frame alignment strategies’ by Snow et al. (1986). This served as a ‘sensitizing concept’ (Glaser, 1978), because my intention was to show that the result of these strategies is not always ‘alignment’. While actors can strategically use language to advance political goals, the possibilities to frame issues in a certain way are limited by the hegemonic discourses in which people operate. These discourses limit the ‘truth’ that is available to us in certain times and contexts and may consequently steer our understanding of an issue in unintended directions (Verloo, 2007). Frame analysis is thus not merely concerned with the use of language as such, but rather aims to discover how language shapes reality and vice versa.

In the empirical chapters, I have shown two dynamics that take place in the process of norm creation, which I have called polarizing and pluralizing. On the one hand, both proponents and opponents of LGBT rights polarize the debate by using similar framing strategies. In the process, both the Self and the Other are constructed as homogenous entities that are mutually exclusive. Western representations of the debate construct Uganda as dangerous and inhospitable to gays and lesbians, while at the same time constructing the West as progressive and tolerant.
By contrast, hegemonic Ugandan representations of the debate construct the West as immoral and imperialistic while portraying Uganda as traditional, conservative and heterosexual. The analysis suggests that the debate is not only a space where an international norm on LGBT rights is negotiated, but also a site where national identities and differences are constructed. In addition, ideas about how to govern international relations are articulated. Whereas the West pursues a global consensus in which other countries follow the example set by the West, dominant voices in Uganda challenge this dominant worldview by emphasizing the right to national sovereignty and cultural diversity. Because framing strategies are embedded in these postcolonial discourses, these strategies do not necessarily lead to congruence building between global and local contexts. Instead, framing strategies may also increase differences between the West and Uganda, and between ‘Western’ and ‘Ugandan’ norms on homosexuality. As a consequence, pressure from Western countries on Uganda to accept gay rights might delegitimize the claims and work of organizations working in this field, in addition to fueling hostility towards gays and lesbians in the country. If this is the case, framing strategies do not necessarily challenge dominant meanings, but may also consolidate and reinforce dominant perspectives and hence undermine the broad acceptance of a new norm.

In the second empirical chapter, I have made a number of additional observations in order to move beyond dichotomies. These observations reject the view that the West and Uganda are homogenous categories, and show that both norms and actors are in constant flux. While the debate is commonly represented as a battle between a pro-gay West versus an anti-gay Uganda, there are a number of additional observations to be made that create space to move beyond such dichotomous thinking. First of all, there is a plurality of voices that can be distinguished in the debate. Although the majority of Ugandans see homosexuality as unnatural, there are also segments of the public that are tolerant. In addition, there are people who do not engage in the debate, or who have other priorities, such as food security and health. Secondly, it appears that the norm ‘LGBT rights’ is ambiguous and not unequivocally defined. The reason is that the human rights framework is an evolving concept, in which not all sets of rights are equally accepted (Zwingel, 2012). Sexual identity rights have only recently been formulated and the question of how these rights relate to the human rights framework remains unclear and contentious (Miller and Vance, 2004). As a result, the multiple positions in the debate are not fixed or given. Rather, positions are dynamic and shifting, resulting in multiple and diverse actor
constellations and norm resonances. Thirdly, actors also use other framing strategies in the debate that cannot be explained by the concept of ‘frame alignment strategies’. While some actors polarize the debate into two opposite camps, actors may also try to negotiate their way out of these fixed categories. In these dynamics, actors constantly reposition themselves on a continuum and try to soften ‘fixed’ categories. A concept as ‘softening’ could be used to describe these processes.

These insights have important implications for our understanding of norm diffusion theory. The analysis has shown that there are no clear sources from where norms emerge, nor are there clear routes by which they spread. The reason is that norms are ambiguous and subject to a wide variety of interpretations to which all actors contribute. Norm diffusion must therefore be seen as an open and continuous process of negotiation. These negotiations never end, but each attempt to fix a norm – for example in a piece of legislation or a social movement claim - gives a new impetus for renegotiating these norms. Moreover, power dynamics play an important role, which may influence the outcome of norm negotiations. The concept of frame alignment strategies (Snow et al., 1986) does not sufficiently capture these ongoing dynamics of norm creation. The findings suggest that scholars who want to advance upon the current state of the art should pay sufficient attention to these ongoing negotiations among multiple actors.
References


Annex

List of secondary data


Newspaper articles


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