Freedom of religion or belief and

freedom of expression

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"Clarity on the intersection between freedom of expression and freedom of religion of belief has become an urgent imperative. This is all the more so because limitations imposed by governments present freedom of expression and freedom of religion or belief as rights in conflict with each other. Such narratives overlook how these two freedoms are, in fact, complementary.

This booklet therefore is a timely corrective, responding to an important and practical need – to foster literacy on the human rights framework in a manner that is accessible to all readers.

Ahmed Shaheed, Former UN Special Rapporteur on freedom of religion or belief (2016-2022)

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Authors' note

This booklet is the third in line in a series about the right to Freedom of Religion or Belief (FoRB) produced by Stefanus Alliance International. "Freedom of Religion or Belief for Everyone" was first released in 2012 and has since then been used by a variety of actors in training and advocacy all over the world. "Freedom of Religion or Belief for Everyone: Women in Focus" was released in 2021 and explores the intersection between FORB and gender equality. This third edition seeks to address three common challenges that arise at the intersection of FoRB and FoE - blasphemy laws, proselytization laws, and hate speech.

This booklet is meant as a general introduction. Due to its short format, it will not be able to present the topic in detail. A key objective has been to make the international normative framework more accessible, to give practical examples, and propose prevention and response strategies for activists and policymakers alike.

Freedom of religion or belief and Freedom of expression: a complex and complementary relationship

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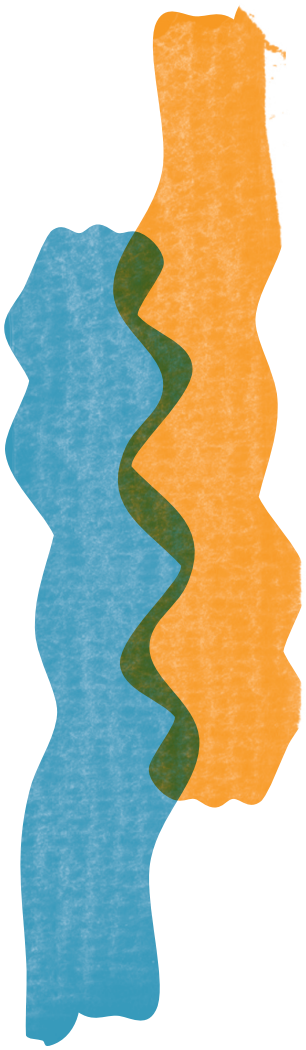


Freedom of Religion or Belief and Freedom of Expression – A complex and complementary relationship

Freedom of thought, conscience and religion -or freedom of religion or belief (FoRB) – and freedom of opinion and expression (FoE) are essential to any free society. Sadly, people all over the world often experience severe limitations on their rights to both FoRB and FoE.

For example, in 2024 a Christian man in eastern Uganda was attacked and killed by extremists for sharing his faith with Muslims[1]. In France, the host-country of the 2024 Olympic Games, French Muslim female athletes were prohibited from participating in the games if they chose to wear hijabs[2]. While in Denmark, a law that effectively criminalizes blasphemy was introduced in 2023, just six years after a blasphemy law was first abolished[3].

In the examples mentioned above, where FoRB and FoE intersect, we see that both rights as well as other fundamental freedoms are being violated. This happens when governments fail to protect human rights or introduce limitations that are overly broad and disregard international standards. States may only limit the rights to FoRB and FoE in very specific circumstances, and only when this is done in accordance with international human rights standards.

In this booklet, we will examine the relationship between FoRB and FoE in the context of i) blasphemy laws, ii) bans on proselytization, and iii) hate speech. We will also discuss the complex and complementary nature of these two rights within an international human rights framework.

What do the rights to FoRB and FoE entail?

Freedom of religion or belief and freedom of expression are closely connected and are fundamental to how people experience the world. Both rights protect the freedom of individuals to have thoughts, opinions or beliefs, to explore and change these, and to express them to others. Both FoRB and FoE are based on the understanding that there is a continuum between a person's inner life *(forum internum)* and the way they express this outwardly *(forum externum)*. We will later explore how these dimensions of FoRB and FoE have implications for limitations.

The right to freedom of religion or belief ensures every person's right **to have** or not to have a religion or belief, the right **to change** their religion or belief, and **to practice** these beliefs. The practice of religion or belief can take many forms, including (but not limited to) worship, performing rituals, providing charity, producing and publishing religious literature, teaching and displaying symbols. Similarly, freedom of opinion and expression ensures every person the right **to have** opinions, and **to seek, receive and impart** information. This right applies regardless of form or medium and covers everything from political ideologies, religious or other beliefs, to works of art.

Everyone shall have the right to freedom of thought, conscience and religion. This right shall include freedom to have or to adopt a religion or belief of his choice, and freedom, either individually or in community with others and in public or private, to manifest his religion or belief in worship, observance, practice and teaching.

Article 18(1) of the International Covenant on Civil and Political Rights

Everyone shall have the right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or through any other media of his choice.

Article 19(2) of the International Covenant on Civil and Political Rights.

Freedom of religion or belief and freedom of expression have been integral to the international human rights framework from the very beginning. Famously in 1941, United States President Franklin D. Roosevelt gave his 'Four Freedoms Speech' to Congress setting out a vision for remaking the world after the Second World War. The four freedoms he named found their way into the Preamble of the Universal Declaration of Human Rights (UDHR) in 1948, which refers to freedom of speech and belief and freedom from fear and want.

Interdependence between FoRB and FoE

All human rights are[4]:
- **Universal**: they apply to everybody everywhere.
- **Indivisible:** they cannot be applied selectively.
- **Interdependent:** they cannot be enjoyed in isolation from each other.
- **Interrelated**: there is no hierarchy of importance.

Like all human rights, FoRB and FoE are designed to protect people. Nevertheless, there is a special relationship between FoRB and FoE. FoRB and FoE are designed to enable people to thrive in diverse and pluralist environments. They have been closely associated with one another since the human rights framework was developed, and they are next to each other both in the Universal Declaration of Human Rights (UDHR) and in the International Covenant on Civil and Political Rights (ICCPR) as articles 18 and 19.

An interdependence between FoRB and FoE suggests that the level of enjoyment of one right is dependent on the level of realization of the other. Religious groups rely on verbal communication, literature, art or media to express their religious beliefs. For instance, when the possession, distribution, and import of religious literature is restricted, this impacts not only a religious group's right to manifest religion (FoRB), but also their right to information through printed media (FoE).

There is a common misconception that the rights to FoRB and FoE are in conflict with one another. For example, some people see blasphemy bans as a way to protect "religious feelings". This argument rests on the idea that FoRB for some can only be achieved when limiting the free speech for others. This is a widespread misinterpretation of how the two rights relate to one another, that one right only can be achieved at the cost of another. Later in this booklet, as we discuss the criteria for legitimate limitations on FoRB and FoE, we will see that this is a false dichotomy. This is based on the principle of interrelatedness of all human rights, namely that the fulfillment of one right cannot be achieved at the expense of the fulfillment of another right.

Why are both FoRB and FoE important?

Freedom of religion or belief and freedom of expression are hugely important rights in and of themselves. Deep down people have a need to be able to make sense of the world and express themselves authentically.

Moreover, FoRB and FoE – along with the right to peaceful assembly and association (articles 21 and 22 of the ICCPR) – are essential building blocks of diverse, democratic societies. FoRB and FoE enable the coexistence of thoughts, ideas, opinions, interests, convictions, religions and beliefs. When diversity is allowed and even championed it has the power to counter "the tyranny of the majority". Both FoRB and FoE empower minorities and dissenters to challenge majority interpretations and authoritarian behavior. Like all human rights, they help limit and hold power accountable and are therefore linked with democratic governance. In fact, research has shown that restrictions on freedom of expression is the first and most frequent indicator of democratic backsliding[5]. The relationship between human rights and democracy is clearly articulated in article 21 of the Universal Declaration of Human Rights.

Furthermore, these rights are essential for people and societies to form public opinion, manifest beliefs and interests, and establish institutions and infrastructure. They play a crucial role in the development of political parties, trade unions, science, art, religious or belief communities. Not only are such institutions and organizations important for a healthy society, but they also allow for creation of interest groups and structures outside of the power of the state. In a democracy, civil society is a critical counterweight to state power.

What about limitations?

As important as FoRB and FoE are for individuals and societies, there can be situations where it might be necessary to limit them. This is especially true when expressions of FoRB or FoE threaten the safety or freedoms of others. In such cases, governments might need to restrict the spread of expressions, practices and behaviors that incite violence.

While certain limitations of FoRB and FoE are permissible under international human rights law, the scope of limitations needs to be very narrow and only applied to specific instances. Unfortunately, governments around the world often impose overly broad and illegitimate limitations on these rights. Consequently, state and non-state actors can more easily end up violating the fundamental freedoms of others. When introducing limitations to FoRB and FoE, governments must make sure that these are in accordance with international human rights law. The international human rights framework provides guidelines on how and when human rights can be limited.

Legitimate limitations

In human rights law, FoRB and FoE are the only two rights that have a *forum internum* and a *forum externum*. *Forum internum* refers to a person's inner life where thoughts, beliefs and opinions are formed. The freedom of thought and conscience, and the right to "have" or to "adopt" a religion or belief are part of the *forum internum* of FoRB. Likewise, freedom of opinion belongs to the *forum internum* of FoE. *Forum internum* enjoys absolute protection under the international human rights framework and can never be subject to limitations[6].

The external dimension – known as the *forum externum* – is about how people manifest or express their convictions. This includes the right to practice one's religion or belief, and to "seek, receive and impart information". Unlike the *forum internum*, this is not an absolute right. Manifesting, expressing or practicing one's convictions or beliefs can be limited, but the threshold for limitations is high. Limitations should be the exception to the rule and can only be justified when they meet the criteria set out in articles 18 (3) and 19 (3) of the ICCPR. Any limitation must meet all of the following requirements:

CASE

Religious minority accused of espionage

Iran's approximately 300,000 Baha'i followers are considered a "deviant sect of Islam" by the Iranian government and have suffered from executions, harassment, discrimination, and violence for over four decades[7]. Because its world headquarters is based in Haifa, Israel, the group is often accused of spying on behalf of the Israeli government. Scores of Baha'i followers have been arrested on charges ranging from "assembly and collusion against national security" to "propaganda against the state". In 2024, at least 70 Baha'ís were reported to be detained or imprisoned, while an additional 1,200 awaited or had received harsh and lengthy prison sentences[8].

- Restrictions must be prescribed by law, in order to prevent governments from intervening in an arbitrary and unpredictable manner. The law must be precisely formulated and made accessible to the public.
- Restrictions must serve a legitimate purpose and be applied only for the specific need they aim to address.
- Restrictions may not be imposed for discriminatory purposes or applied in a discriminatory manner.
- Restrictions must be proportionate. Governments must demonstrate that the action taken is appropriate and proportionate, and the least intrusive among all the adequate measures that could be applied.

What constitutes a legitimate purpose for limiting FoRB or FoE is open for interpretation and therefore challenging to apply in different contexts. Article 18 (3) defines legitimate purposes for limitations as "protecting public safety, order, health, or morals or the fundamental rights and freedoms of others". Thus, when religious manifestations become harmful or threaten the freedom of others, limitations might be necessary. An example of when a limitation may be necessary is the religious practice of female genital mutilation. Furthermore, no manifestation of religion or belief may amount to propaganda for war or advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence[9].

Article 19 (3) defines legitimate purposes for limitations as "respect of the rights or reputations of others or to the protection of national security or of public order (ordre public) or of public health or morals". Thus, if some expressions prevent others from exercising their rights, limitations might be necessary. For example, it might be permissible to limit expressions of intimidation or coercion leading up to an election in order to safeguard the right to vote[10]. Although these lists are almost identical, an important distinction is that Article 19 permits limitations based on national security concerns, while Article 18 does not.

Illegitimate limitations

Most states officially recognize the importance of freedom of expression and freedom of religion or belief. More than 90% of all states (174 out of 193 UN Member States) have ratified the ICCPR and many states have enshrined the rights to FoRB and FoE in their national constitutions. Meanwhile, nearly every state has national laws and practices which restrict the rights to FoRB and FoE in ways that fail to conform to international human rights standards[11].

Frequent and recurrent illegitimate limitations of FoRB and FoE include the silencing of government or religious critics, censorship of the media, and anti-terrorist laws that tend to target religious minority groups, just to name a few. Such restrictions have a wider "chilling effect" beyond their immediate targets, since the fear of being punished leads others to self-censorship. Sadly, censorship is an effective but illegitimate way to preserve political or religious power. The arguments for introducing censorship include accusations of "fake news", a need to "protect public peace" or "preserve harmony" between groups.

Some governments argue that restrictions are needed to protect national security, labelling critics or minorities as "extremists" or "foreign agents". Many times, minorities and critics are simply subject to false accusations. None of these restrictions meet the requirements of international standards. Criticism, whether of a government or a religion, does not classify as a legitimate purpose for limitations. Neither are expressions that feel uncomfortable, challenging or even offensive valid reasons for limiting FoE.

We will now turn to three common challenges at the intersection of FoRB and FoE; anti-proselytization laws, anti-blasphemy laws and hate speech against religious minorities.

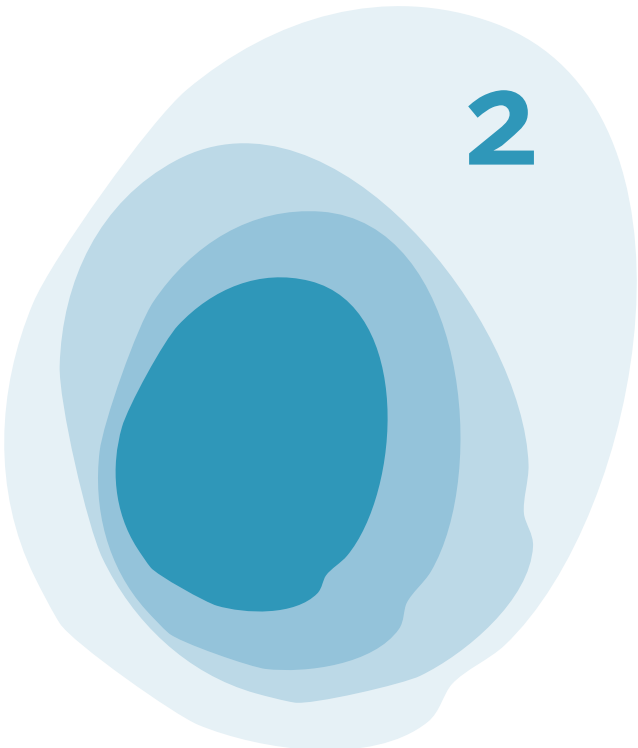
Questions for reflection

1 What do FoRB and FoE mean to you?

2 Can you think of situations where the rights to FoRB and FoE might clash?

3 In what instances do you think limiting FoRB or FoE should be permissible? Share examples from your own context.

4 What do FoRB and FoE mean for the development of society as a whole? In what way are FoRB and FoE a counterweight to the "tyranny of the majority"?



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Proselytization: sharing one's religion or belief

Most major world religions as well as less widespread religious groups encourage their followers to share their beliefs. While some religions allow their members to choose to what degree they engage in these activities, others present it as a divine command that must be obeyed. Thus, for many believers around the world the right to hold their beliefs is inseparably linked to the right to share these beliefs.

Religious actors use different terms to describe such activities. Christians will use "mission" or "evangelism", while Muslims speak of "Da'Wa". The terms used in international law include "the right to engage in religious persuasion", "the right to impart one's views", or "proselytism". This last term poses particular challenges for religious actors. Although originally meant to simply describe a change of conviction, it has become a synonym for unethical attempts to convert others involving coercion or manipulation. Also, religious actors themselves have a negative view of the term "proselytism" and typically would not use it to describe their own activities. The choice to use this term in this booklet was influenced by the fact that it is the term most often used in international as well as national laws.

Why anti-proselytization laws?

The right to share one's religious convictions is protected by FoRB and FoE and as discussed earlier, the threshold for limiting these rights is high. Nevertheless, various actors advocate for general limitations or complete prohibition of proselytism. Among these are states that introduce anti-proselytization laws, religious actors who support and promote bans on proselytism as well as local religious communities that oppose religious change. Although they might use different tools to restrict proselytization, their motivation for doing so is usually quite similar.

The most common tool for restricting proselytism used by states is anti-proselytization laws. In most cases these laws are aimed at punishing persons who encourage members of another religious or belief group to change or leave their religion or belief. For this reason, restrictions on proselytization are closely linked to the right to convert. These restrictions mostly apply to a minority group seeking to proselytize members of the majority religion. In 2021, 38 countries around the world had legal limitations related to sharing one's beliefs[12].

The most common justification for anti-proselytization laws is a need to protect the majority or state supported religion. These laws prohibit the promotion of any other religion than the state- supported majority religion and penalize any invitation to convert away from this religion. These laws are often set in place with an aim to preserve the religious dominance and political influence of the majority group. Furthermore, the state might fear that if minority groups increase in numbers, they could gain social and political influence and thus threaten the power of the state. Anti-proselytization is one of the ways states and religious actors belonging to majority religion can control the growth and number of minorities.

Religious actors and religious communities belonging to the state-supported religion would usually be in favor of this kind of legislation. They might be interested in preserving the privileges and power that come with being part of the majority, but their resistance to proselytism might also be related to absolute truth claims. Invitation to convert to another religion implicitly means that the original religion is somehow flawed, and that the "new" religion is better.

The second most common type of anti-proselytization laws involve prohibitions against imposing one's views or converting others by means of force, coercion, seduction, allurement or promise of material or other kind of gains. Sometimes these laws are specifically aimed at protecting indigenous groups from conversion. Religious actors are usually supportive of these kinds of laws. Most religious people believe that their religion is the only true one. Consequently, the only reason someone would consider leaving it, is because they have been threatened or tricked.

CASE

Prohibitions against conversion to minority religion

As of 2023, twelve States in India had adopted so-called "anti-conversion laws" which prohibits any "attempt to convert" another person[13]. The penalties for conversion attempts increase in cases when the intended convert belongs to a Dalit or indigenous community. So-called "re-conversion" to Hinduism is exempted from the laws. Christians undertaking missionary activities seem to be particularly targeted by the anti-conversion laws. In late 2022, Hindu nationalists in Chhattisgarh State associated with the BJP party launched a campaign of attacks against Christians under suspicion of attempted conversions. The 500-person mob vandalized homes and injured many, demanding that indigenous converts "reconvert" to the Hindu fold[14].

In some cases, anti-proselytization laws are directed specifically towards foreigners, prohibiting them from promoting religions or beliefs other than the majority religion. This prohibition is based on the presumption that if one converts to a religion that is perceived as "foreign" one can become inclined to serve the interests of the foreign powers. Many religious actors support restrictions on religious activities of foreigners. Members of the majority religion often like to promote it as an indispensable element of national or cultural identity. Hence, any "foreign" religion is seen as a threat to the identity and sometimes even survival of the nation.

Why limitations on proselytism are problematic from an international human rights perspective

While there might be good intentions behind the wish to limit particular acts of proselytization, general prohibitions on proselytization are problematic for a number of reasons:

1. Anti-proselytization laws are often applied in a discriminatory manner. Members of minority religions are restricted from sharing their beliefs and converting people as this might upset the members of the majority religion. The same restrictions do not apply to members of the majority religion. They can even be encouraged to undertake missionary activities and "re-convert" minorities to the religion of their forefathers[15]

2. Anti-proselytization laws that claim to protect people from forced conversion or unethical proselytization are often formulated with vague terms like “allurement”, “seduction” or “promises of material or other kind of gains”. This enables misuse and arbitrary application of the law. Due to this inherent weakness these laws can be used to restrict almost any kind of activity of religious or belief groups.

3. Limitations on proselytism are an illegitimate limitation of FoE. On the part of the person sharing their faith, FoE guarantees the right to *impart* information. On the receiving end, FoE protects the individual’s right to *receive* information or ideas. States might argue that anti-proselytism laws protect the right to maintain one’s religion and not to be exposed to unwanted religious persuasion. However, FoE does not shield people from persuasion by others, as part of the ordinary social exposure of society[16]. This includes religious or non-religious beliefs.

4. Limitations on proselytism are also an illegitimate limitation of FoRB. *Forum externum* aspect of FoRB includes the right to manifest religious beliefs, which also involves missionary or other types of preaching activities. The communicative dimension of FoRB implicitly includes freedom to undertake attempts to persuade others and invite them to join one’s own community or adopt one’s religion as long as such missionary activities remain non-coercive[17].

5. Anti-proselytization laws and other limitations that aim to prevent conversion also violate the *forum internum* aspect of FoRB which can never be subjected to limitations. Therefore, no one can be prevented from converting to another religion or belief or recanting their beliefs. Even in cases where the state claims the need to protect indigenous groups from conversion, the choice of the individual should not be substituted by the choice of the state on behalf of the individual[18].

6. As mentioned in the previous chapter, there are strict rules for limiting FoRB and FoE. The wish to protect a particular religious tradition even if it is closely related to the national identity or provides grounds for the national legislation is not a sufficient reason to limit FoRB and FoE. Furthermore, the need to protect social harmony or peaceful co-existence is not a sufficient reason to limit these rights either. In case of social unrest, the focus of the state should be on promoting tolerance and mutual understanding between groups instead of limiting FoRB and FoE.

As argued above, anti-proselytization laws and anti-conversion laws are illegitimate limitations of the rights to FoRB and FoE and therefore should be abolished.

CASE

State actors force minorities to recant their belief

In Vietnam, proselytizing for Protestant Christianity is viewed as a national security threat. For decades, the Vietnamese Communist Party has portrayed the spreading of Protestantism as a tactic the U.S. government uses to undermine the regime. As a result, ethnic minority groups in the North and the Central Highlands who have adopted Christianity are especially targeted for religious persecution by the government[19].

One of the many tactics the government uses to suppress the spread of Protestantism in these areas is to force the minorities to renounce their faith. Local officials and state-appointed religious leaders have been instructed to "encourage the Protestants to return to traditional beliefs" or become Buddhists or Catholics instead. Between 2013-2018, Boat People SOS (BPSOS) documented 150 incidents of forced renouncement of faith by the police. Those who refuse to recant their faith risk forced migration and confiscation of identity papers which are necessary to gain access to employment, education and social services.

When are limitations of proselytism necessary?

Although both FoRB and FoE guarantee the right to share one's religious beliefs with the goal of persuading the listener to change their religion, these actions should not infringe on the freedom of others to have or to adopt a religion or belief of their choice. International law makes it clear that no one should be subjected to coercion, threats or violence of any kind because of their decision to keep, change, or profess their religion or belief, or lack thereof.

Unfortunately, in some countries religious minorities or other marginalized communities are subjected to forced attempts to make them abandon their religious affiliation and join the majority religion. In some cases, state actors are complicit or even the main perpetrator of these actions. Women and girls from minority religious or belief communities are particularly vulnerable to forced conversion to the majority religion as a result of kidnapping and forced marriage.

While there is a serious need for states to prevent coercion, any attempt to do so through legal means must not introduce overly broad limitations. An example of this is when states prohibit the establishment of educational or health care facilities or any other kind of charitable activity of religious communities in fear of a hidden agenda to convert the recipients of these services.

Providing clear criteria for how to identify unethical proselytism and forced conversion can be complicated. It involves recognizing possible vulnerabilities, but also the need to define what constitutes an informed consent. For this reason, religious and non-religious actors have attempted to define the appropriate parameters for ethical proselytism. Important principles include avoiding vested interests, assessing the perceived vulnerability of the recipients and the manner in which the information is presented.

Questions for reflection

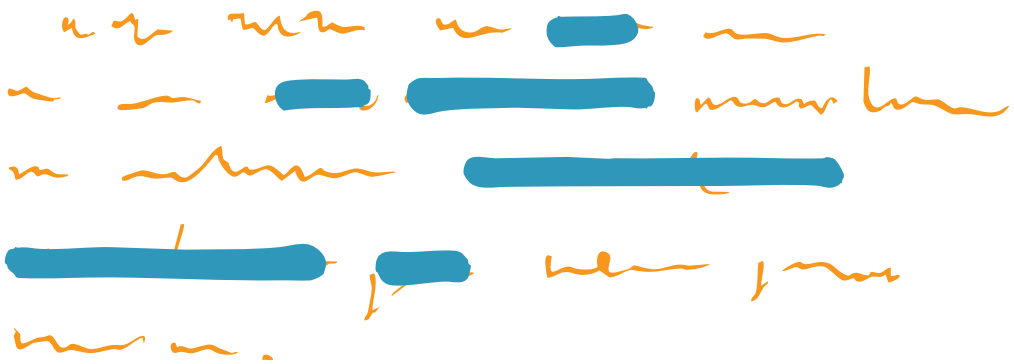
1 What do you think about the right to share one's religious beliefs with others? Is it different than sharing political beliefs, philosophies, or scientific theories?

2 Why is conversion seen as a problem or even a threat by some governments?

3 Persons sharing their religion or beliefs are obliged to respect the rights and freedoms of others. What constitutes acceptable behavior in the context of sharing beliefs with others? What are the risks?

Ethical guidelines for missionary activity

The Oslo Coalition on Freedom of Religion and Belief (the Oslo Coalition) released a report in 2009 that aimed to establish ethical standards for missionary activities in light of human rights. "Recommended Ground Rules on Missionary Activities"[20] was the result of a long consultative process with representatives from Norwegian and foreign academic bodies, faith communities and missionary organizations. The document is intended to stimulate debate and ethical reflection for actors such as missionaries, missionary organizations and other religious actors around own activities and as a help to produce guidelines that are in line with international human rights.



3 Blasphemy

Blasphemy can be defined as "speech or actions considered to be contemptuous of God or of people or objects considered sacred"[21]. Blasphemy laws were first codified in Europe in the Middle Ages in attempts to protect state churches. Enforcement of these laws gradually disappeared with the separation of church and state during the Enlightenment period. Nevertheless, some European countries still have blasphemy laws today. Blasphemy laws later spread to countries across Asia, Africa and the Caribbean as part of the colonial legacy. With the rise of political Islam in the 1970's, blasphemy laws based on Islamic jurisprudence were introduced in many Muslim-majority countries[22]. Today, more than 95 countries have laws prohibiting blasphemy. Sanctions range from fines to prison and the death penalty[23].

Whatever their origin, blasphemy laws have historically served a double purpose in both protecting religious orthodoxy as well as preserving political power. Especially in countries with close ties between religion and state, blasphemy can be seen as political criticism and an act of disloyalty. For this reason, blasphemy is controversial in both national and international debates. Like norms and laws against proselytism, minorities are disproportionately impacted by blasphemy laws and the line between blasphemy and hate speech against minorities is not always clear. In countries where the rule of law is weak, false blasphemy charges can be a way to scapegoat minorities or settle personal conflicts. Even if blasphemy charges do not result in a sentence, violent mobs often take matters into their own hands and punish the accused.

Why prohibit blasphemy?

Social norms and laws prohibiting blasphemy have arisen in all parts of the world. Yet the reasoning for introducing or upholding such norms and laws is surprisingly similar. Perhaps the most common justification for bans on blasphemy is the need to protect the "religious feelings" of those who feel that their religion has been insulted. Often, only the majority religion is offered such protection, although this is not always stated explicitly in the law.

A common argument for having blasphemy laws, often based on religious doctrines and jurisprudence, is to protect the "purity of religion". Doctrinal interpretations that contradict the established interpretations are seen as defiling that purity. For instance, relatively large religious minorities outside of established orthodoxy, like the Ahmadiyah and Shia Muslims, have in certain contexts been deemed blasphemous and heretic[24].

Another common defense of blasphemy laws is that they protect "inter-religious peace" and "public order". Government officials fear that religious provocation and intolerance will fuel tensions between religious groups and ultimately disturb peaceful co-existence. Sometimes, as in Switzerland, a special emphasis is placed on the need to protect religious minorities[25].

The previous two paragraphs are examples of explicit arguments for blasphemy laws. But implicit interests may also contribute to sustaining blasphemy laws. Like norms and laws against proselytism, blasphemy laws have historically been used to preserve political power. For

CASE

Accusations of insulting religious symbols

In 2020, three street artists from Myanmar's Kachin State were charged with insulting religion for painting a mural that aimed to raise awareness about the COVID-19 pandemic. Under the message "Stay at home. Save lives", the image featured a Grim Reaper-like figure spreading the coronavirus while three medics tried to save the planet. Facebook users reacted angrily to the fact that the skeletal figure's robe resembled a Buddhist monk. The artists were bombarded by online hate speech and painted over their work. After three months of court hearings, the artists were freed after proving that the Grim Reaper was, in fact, a representation of death, and not a Buddhist monk[26].

Article 295A of Myanmar's Penal Code which criminalizes speech that insults religion provides for up to two years of imprisonment. It has consistently been used to charge individuals who criticize Buddhist leaders or who use Buddhist imagery, without proven "intent of malice".

CASE

Politicizing blasphemy laws

Since Indonesia's democratic transition in 1998, blasphemy cases have been on the rise. The 2017 case against the Chinese-Christian Governor of Jakarta marked a new turning point in the use of blasphemy allegations for political ends[27]. In 2016, Basuki "Ahok" Tjahaja Purnama referenced a Quranic text in an election campaign speech. A video of his speech went viral on Facebook, provoking hardline Islamic groups to mobilize tens of thousands in street protests demanding Ahok's arrest. These demands reached the Islamic Ulema (MUI) and ultimately resulted in a two-year prison sentence for Ahok for blaspheming Islam and the Quran. Three of the judges who sentenced him were later given promotions.

instance, introducing blasphemy laws can be a means for the government to gain political support from a certain constituency. Sometimes, government authorities will even use blasphemy charges to levy false accusations against critics, in order to maintain power. Likewise, blasphemy laws can also be used in ways that protect the state religion, or majority religious community, often at the expense of minorities.

Why blasphemy laws are problematic from an international human rights' perspective

Many people of faith may feel a strong impulse to protect what they hold to be sacred from insult or offence. But doing so through legislation is extremely problematic because of the wider effect this has on society. Blasphemy laws are problematic for number of reasons:

1. The vast majority of blasphemy laws are imprecise and vaguely formulated. This leads to abuse, as is the case when blasphemy charges are politically motivated[28]. Blasphemy laws can be used to silence political dissent, journalists and other critical voices[29].

2. Blasphemy laws are often applied in a discriminatory manner, typically protecting one set of religious beliefs over others. There is clear evidence that members of religious minorities suffer disproportionately from blasphemy accusations[30].

3. Blasphemy laws are illegitimate limitations of FoE. Freedom of expression protects a wide range of expressions, even those that may be regarded as deeply offensive to others[31]. No religious doctrine, ideology or religious symbol is protected from criticism or ridicule[32].

4. Blasphemy laws do not protect FoRB. FoRB is designed to protect the individual and not the religious beliefs or symbols that they hold dearly. The notion of "religious feelings" is not a part of FoRB and thus not in need of protection from a human rights perspective[33]. Therefore, the argument that FoE needs to be limited for the sake of protecting FoRB does not hold true.

5. Ironically, rather than protecting FoRB, the very existence of blasphemy laws can trigger FoRB violations and the violence it seeks to prevent. States that have laws against blasphemy, apostasy or defamation of religion are more likely to have higher government restrictions on religion or social hostilities on religious grounds than countries that do not have such laws[34]. In countries with blasphemy laws, there is more discrimination against minorities and higher incidents of religiously related mob violence

.

Should blasphemy laws be repealed?

Although from a human rights perspective, blasphemy laws protect neither FoRB nor FoE, UN Member States have been engaged in a discussion about the perceived need for an international resolution on blasphemy for more than two decades. In 1999, the "defamation of religion" debate was introduced at the UN Human Rights Council through a draft resolution by Pakistan. Together with members of the Organisation of Islamic Cooperation (OIC), they feared rising Islamophobia in the West, and saw a need to protect religions (Islam, in particular), from insults and hate. Up until 2010, similar resolutions were adopted each year, slowly building a global consensus on the need to protect the reputation of religions[36].

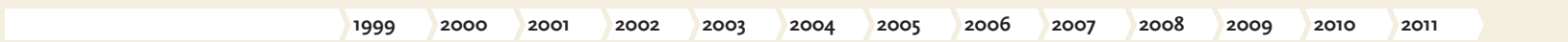
The resolutions drew increasing criticism from Western states, UN independent experts, and civil society organizations who thought blasphemy laws came at odds with FoRB and FoE. A diplomatic compromise was ultimately found in the 2011 adoption of resolution 16/18. Rather than protecting religions, as such, the resolution placed emphasis on protection against incitement to hatred and violence against individuals. "Incitement to violence" as a concept was later explored through an expert-led process that resulted in the Rabat Plan of Action.

> *"Abundant experience in a number of countries demonstrates that blasphemy laws do not contribute to a climate of religious openness, tolerance, non-discrimination and respect. To the contrary, they often fuel stereotyping, stigmatization, discrimination and incitement to violence."*
>
> **Heiner Bielefeldt, former UN Special Rapporteur on Freedom of Religion or Belief[35]**

Istanbul Process

1999-2010
Annual resolutions on "defamation of religions" were adopted by a majority vote at the UN Commission on Human Rights, General Assembly and Human Rights Council.

2011
Resolution 16/18 on 'Combating intolerance, negative stereotyping and stigmatization of, and discrimination, incitement to violence, and violence against persons based on religion or belief' was adopted by consensus.



The political compromise of resolution 16/18 proved fragile as states struggled to maintain momentum in its follow-up mechanism, the "Istanbul Process"[37]. Differences between the OIC approach and the Western approach surfaced again in 2023 in response to Qur'an burning incidents in Sweden and Denmark[38]. OIC countries tabled Resolution 53/1 that closely linked Qur'an burnings with incitement – a de facto blasphemy prohibition. Many Western countries saw resolution 53/1 as diverging from the human rights-based consensus of 16/18 and voted against the text[39].

Nevertheless, there is an overwhelmingly strong human rights case to repeal blasphemy laws. The various mandate holders of the UN Special Rapporteur of FoRB have a track record for advocating for their repeal[40], as have soft law instruments such as the Rabat Plan of Action and the Beirut Declaration[41]. Furthermore, General Comment 34 (an official UN interpretation of FoE) stated that:

> *Prohibitions of displays of lack of respect for a religion or other belief system, including blasphemy laws, are incompatible with the [ICCPR], except in the specific circumstances envisaged in article 20, paragraph 2.*

Ultimately, blanket limitations on blasphemous expressions through blasphemy laws are incompatible with human rights law. An important exception is when such expressions rise to the level of incitement to discrimination, hostility or violence against individuals or a group of people. In specific circumstances and judged on a case-by-case basis, some expressions may meet the requirement for limitations based on Article 19(3) or Article 20(2) of the ICCPR, or Article 4 of CERD[42]. This will be discussed further under the Hate Speech chapter.

2011-2022
The Istanbul Process launched in Turkey in July 2011 to monitor the implementation of resolution 16/18. Eight expert-level meetings were subsequently held in Washington, London, Geneva, Doha, Jeddah, Singapore, the Hague and virtually by the Permanent Mission of Pakistan to the United Nations in Geneva.

2012
The Rabat Plan of Action on 'the prohibition of advocacy of national, racial or religious hatred that constitutes incitement to hostility, discrimination or violence', was developed by international experts with the support of the UN Office of the High Commissioner on Human Rights (OHCHR).

2023
The Human Rights Council adopts resolution 53/1 on "Countering religious hatred constituting incitement to discrimination, hostility or violence" by majority vote.

2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024

Questions for reflection

1 What do you think about criticizing religion, questioning doctrines and making fun of religious figures and sacred texts?

2 How can blasphemy laws be used to cause harm?

3 Blasphemy laws try to enforce respect through legal measures, but respect and tolerance are better developed through more thoughtful, non-legal approaches. What are some practical alternatives to criminalizing blasphemy?

4 Hate speech against religious minorities

Hate speech can have serious, harmful effects on individuals and societies as a whole. Hate often builds on a narrative that certain groups of people do not truly belong in "our" society or community and therefore can legitimately be subjected to hostility or hatred. Such hatred may focus on one or several aspects of a person's identity. Ethnic or religious minorities, or other disadvantaged groups, like women, are often easy targets. Hate speech has become a particular challenge in the age of social media, where messages are disseminated faster and to a larger audience than before. Another challenge is that a culture of impunity leaves marginalized groups, who are targeted, without redress or remedy.

Hate speech has no internationally agreed definition and is deeply contextual. Nevertheless, the UN Strategy and Plan of Action on Hate Speech[43] has proposed the following definition:

> *"Any kind of communication in speech, writing or behaviour, that attacks or uses pejorative or discriminatory language with reference to a person or a group on the basis of who they are, in other words, based on their religion, ethnicity, nationality, race, colour, descent, gender or other identity factor."*

Hate speech raises important questions about the acceptable limits of FoE. There is a line between legal and illegal hate speech. According to international human rights law this line is crossed when hateful expressions *incite to violence*. Roughly speaking, expressions that are simply rude, offensive or critical, are awful but lawful and must be tolerated from a human rights perspective. Hate speech that infringes on the rights and freedoms of others must be restricted in line with international human rights standards. We will explore the term *incitement to violence* later on in this chapter when we introduce the Rabat Plan of Action.

> *"Hate speech is an alarm bell - the louder it rings, the greater the threat of genocide. It precedes and promotes violence."*
>
> **United Nations Secretary-General António Guterres, May 2019**

When hate speech becomes dangerous

Hate speech is dangerous because it can be a steppingstone towards real-life discrimination and violence. History shows that hate speech, in many cases, was identified as a precursor to atrocity crimes, including genocide. This escalation is typically driven by a combination of uncertainty, fear, and the struggle to secure and maintain power. In 1954, psychologist Gordon Allport developed a model that illustrates this process of escalation[44].

- **Hate Speech** (or what Allport calls antilocution). When people spread negative verbal remarks about another group based on prejudice. A gradual building up of animosity and rumor (like disinformation campaigns) can set the stage for violent outbreak.
- **Avoidance**: When members of the disliked group are avoided and ignored without directly inflicting harm upon them.
- **Discrimination**: When the disliked group is treated differently and excluded, for instance from the neighborhood, employment, social services, or country. Discrimination includes segregation policies, like the Jim Crow Laws in America's South, or the Apartheid system in South Africa.
- **Hate Crime** (or what Allport calls physical attack): May involve harassment or violence against persons, buildings, or other property of the minority group.
- **Extermination**: When individual members of the disliked group are targeted for killing, such as lynchings and mob violence. The classification of genocide applies when a whole group based on national, ethnic, racial or religious identity are targeted for destruction in a systematic way[45].

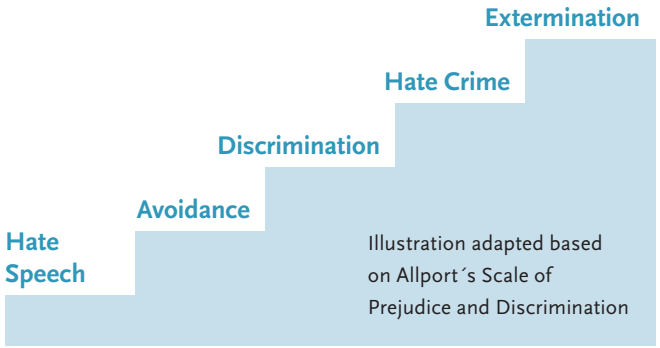


Illustration adapted based on Allport´s Scale of Prejudice and Discrimination

CASE

Genocide of Jews during World War 2

The timeline of events leading up to the Holocaust, where 6 million Jews were systematically murdered, is a classic example of how the dehumanization of a minority group helped justify genocide. While anti-Semitic sentiments existed in Germany long before Adolf Hitler rose to power, the Nazi race ideology quickly became a means to mobilize the German public. The Nazi regime orchestrated public propaganda campaigns coupled with mass censorship over the media and public information.

Nazi anti-Semitic propaganda repeatedly sought to demonize and dehumanize the Jewish population, portraying them as animals and parasites, or infectious diseases. Jews were accused of plotting to achieve world domination and were portrayed as evil, criminals or traitors. Germany's defeat in World War 1, followed by economic and political instability, and the fear of Communism may have made many Germans more open to anti-Semitic ideas[47].

Non-Jews gradually stopped socializing with Jews or shopping in Jewish-owned stores, many advocating for segregation of Jews from German society. Jewish citizens were harassed and subjected to violent attacks. Anti-Semitic policies were introduced, effectively excluding Jews from employment, criminalizing inter-racial marriages and revoking the right to citizenship. Soon after these laws were passed the violent program of extermination began, shipping thousands of Jews and other minorities to death camps.

In times of crisis and social change, minorities are often portrayed as scapegoats. For example, during the Covid-19 pandemic, minority groups across Iraq, Pakistan, India, Sri Lanka, Myanmar and Cambodia were all targets of hate speech and accused of spreading the virus[46]. Hate speech can also be used ideologically to define the boundaries of national identity. Populist leaders have a tendency to weaponize religious identity for political ends. Ethnic and religious minorities can be perceived as foreign and unwelcome to the nation. This serves to justify discrimination or the use of violence against them.

Regulating hate speech according to international human rights law

As mentioned earlier, hate speech can be both legal and illegal. The non-governmental organization Article 19 has proposed a useful typology which divides hate speech into three categories: 1. Expressions that must be protected, 2. expressions that may be restricted, and 3. expressions that must be restricted according to international human rights law (see illustration[48]). In accordance with article 19(3) of the ICCPR, the threshold for limiting FoE is high. However, there are limits to FoE when hateful expressions interfere with the rights and freedoms of others. States have an obligation through article 20(2) of the ICCPR to limit "Any advocacy of national, racial or religious hatred that constitutes **incitement to discrimination, hostility or violence**". Similarly, resolution 16/18 (paragraph 5f) calls on states to 'adopt measures to criminalize incitement to imminent violence based on religion or belief.'

Unfortunately, there is no international consensus on the definition of "incitement". Neither is there agreement on what constitutes legitimate restrictions on hateful expressions. National legal frameworks for prohibiting hateful expression vary across states. On one end of the spectrum, countries like the United States of America protect all speech unless it is likely to result in imminent violence. At the other end of the spectrum are strict restrictions, for instance various prohibitions against Holocaust denial in some European countries.

To complicate matters further, hate speech or incitement laws are sometimes misused to silence or intimidate government critics and dissenters. Sometimes they are even used to restrict minorities from promoting their culture and identity. Such laws are often vaguely formulated and arbitrarily applied. This can also lead to the direct and structural marginalization of religious or belief communities[49]. Such hate speech laws have similar negative effects as blasphemy laws and may serve to reinforce the dominant political, social and moral narrative and opinions of a given society[50].

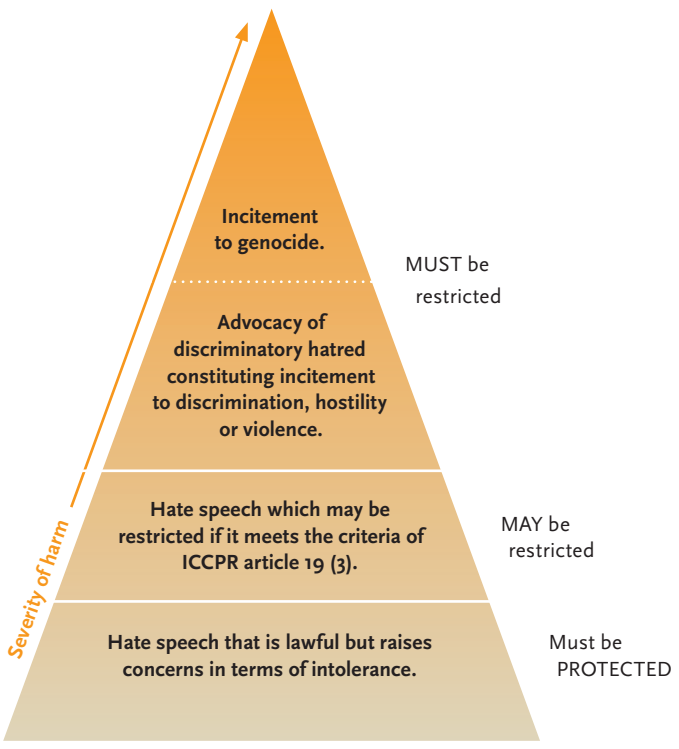


Illustration based on ARTICLE 19's Hate Speech Pyramid

CASE

The spread of Islamophobic hate speech on social media

With increased access to mobile phones and the internet, hate speech against religious minorities and other marginalized groups have been rampant in Sri Lanka in recent years, especially on social media. Extremist Buddhist groups perpetuate religious slurs and stereotypes, typically for political ends, with impunity. Islamophobic narratives include a portrayal of Muslims as invaders and extremists. A common conspiracy theory speaks to an 'Islamic invasion' where the Muslim population is accused of trying to outgrow the majority Sinhalese, including through forced sterilization attempts of Sinhalese women[51]. In 2019, a study made links between rumors and hate speech against Muslims on Facebook, to anti-Muslim riots in Digana causing bodily and propriety injuries, and two killings[52].

Incitement to violence threshold test

To help unpack the obligations on states to prohibit 'incitement', the OHCHR initiated an expert-led process that resulted in the Rabat Plan of Action. The Rabat Plan gives policy guidance on how Article 20(2) of the ICCPR should be interpreted and the actual definitions of incitement to violence.

The Rabat Plan stresses that there should be a high threshold for restricting FoE, and that "limitation of speech must remain an exception"[53]. It specifies that "criminal sanctions (...) be applied only in strictly justifiable situations". Limitations on hate speech must meet the strict criteria established in both article 19(3) and 20(2) of the ICCPR, and be "legal, proportional and necessary". The Rabat Plan proposed a threshold test for assessing dangerous speech, taking into account the following six factors:

1. The social and political **context** the expression was made in.
2. The position or status of the **speaker** vis-à-vis the audience.
3. Whether there was any **intent** to incite the audience against a target group.
4. The severity of the **content**, as well as its form and style.
5. The **extent**, frequency, quantity and accessibility of what is being disseminated.
6. The **likelihood of harm**, including its imminence.

This threshold test clarifies that the need for limitations on FoE must be assessed in context on a case-by-case basis. The level of severity is based on the intent and likelihood of harm, the frequency, quantity and extent of the communication, and its content, context and speaker. Thus, *incitement to violence* is when the intention is to cause harm against a target group by mobilizing others, and this has a probability to succeed. Even where this threshold is met, any sanctions should be determined on the basis of necessity and proportionality, and criminal responses only used as a last resort.

Finally, the Rabat Plan offers policy recommendations on how to tackle root causes of discrimination, some of which will be discussed in the final chapter of this booklet concerning practical prevention and response strategies for FoRB and FoE violations.

Questions for reflection

1 Can you give examples of disinformation, discrimination and violent persecution from your own context?

2 Which prejudices are common toward your own religious or belief community, if you belong to one?

3 Study Allport's Scale of Prejudice that explains how hate speech may escalate into violence and genocide. How would you say the case study of World War 2 Holocaust fits into this theory?

4 What would be some effective strategies for responding to the spread of hatred online?

5 What can we do?

A society filled with human beings with diverse worldviews, values and interests will inevitably lead to disagreement and conflict. Conflict in and of itself is not necessarily a problem, rather the problem arises in *how* conflicts are handled. Often, states implement overly broad restrictions to protect the power and interests of some political or religious stakeholders over others. Blasphemy laws, bans on proselytization and vague hate speech laws violate the rights to FoRB or FoE. They deliberately favor majority interests at the expense of minorities and those critical of existing power structures. States should implement legal and non-legal frameworks that enable all segments of society to participate on equal footing, respect fundamental freedoms and tackle root causes of religious discrimination and violence.

In this context, international human rights standards offer a helpful framework that facilitates the peaceful co-existence of individuals and groups with diverse belief systems, opinions, identities and expressions. To create a society that respects pluralism, inclusion and non-discrimination takes time and requires more than a legal response. A "whole-of-society" approach is needed, mobilizing multiple stakeholders to tackle the challenges of discrimination and violence. The Rabat Plan of Action suggests non-legal policy measures on how to strengthen a culture of peace, tolerance and mutual respect among individuals, some of which are outlined here.

Legal reform

Countries that place high levels of government restrictions on the rights to FoRB and FoE tend to have far more incidences of religious intolerance than countries with fewer restrictions[55]. There is good reason to believe that legal restrictions on FoRB and FoE, like blasphemy laws, do not prevent violations but actually provoke them. For this reason, states should repeal laws against apostasy, blasphemy and conversion, as well as laws that prohibit proselytism. In accordance with article 20(2) of the ICCPR, states should criminalize incitement to imminent violence based on religion or belief but ensure these prohibitions are in line with the Rabat Plan of Action's threshold test. Other types of legislation that serve to censor free speech, or disproportionately target minorities, including sedition, lèse-majesté laws or undue counter-terrorism laws require urgent repeal or revision[56]. Parliamentarians and human rights organizations have a role to play in this process.

Revising discriminatory school curricula

Rather than combatting religious intolerance through legal restrictions, states should invest in positive measures that promote respect for human rights, diversity and equality, including through the education system. In several countries, negative religious stereotyping is perpetuated through school curricula, often dehumanizing minority groups and portraying them as inferior. Since young minds

BEST PRACTICE

Reforming school curriculum

Despite Iraq's rich ethnic and religious diversity, certain minority groups are completely omitted from the education curriculum while others are portrayed in derogatory ways, which in turn fuels stereotypes and discrimination.

In 2021, the Alliance of Iraqi Minorities (AIM) initiated two campaigns to advocate for reforms to the primary and secondary school curriculum systems in Iraq and the semiautonomous Kurdistan Region[54]. AIM met with hundreds from Iraq's majority and minority religions to develop recommendations on curricula revisions in history, geography, civics, languages, arts, and religion. For example, within grammar and reading comprehension exercises it was suggested to showcase names and heritage that represent the backgrounds of all Iraqis. Also, there was consensus to separate the study of Arabic language from the study of the Quran. Most of the AIM's recommendations were accepted by the Federal Iraqi government and the Kurdistan authorities who both committed to remove, revise and add to the current curriculum for greater equality and inclusivity.

> *The best antidote to problematic uses of freedom of expression is a better use of the same right, or in short: hate speech can best be countered by 'positive speech'.*
>
> **Heiner Bielefeldt, Nazila Ghanea and Michael Wiener**[58]

are especially receptive to all kinds of ideas, curriculums, teaching materials and textbooks with negative stereotypes or which condone religious discrimination or violence, should be revised[57]. Furthermore, education and peer-to-peer learning on human rights, pluralism and non-discrimination are advised for teachers and students of all ages.

Promoting a free and inclusive public debate

Closed online discussion spaces enable the spreading of rumors and for prejudices to go unchecked. If taken too far, this can escalate into conspiracy theories and incitement to hatred or violence. In free, open debates, on the other hand, questionable attitudes towards minorities and justification for the use of violence can be challenged by others. For this reason, FoE in the form of an open, constructive and respectful public debate plays a positive role in combating incitement to religious hatred and violence[59].

Governments have the responsibility to create a legislative and policy framework for an open and robust public debate. Governments should ensure a free and open Internet, promote a diverse and independent media, protect journalists and whistle-blowers, ensure access to public information, and invest in media and digital literacy[60].

Editorial media has a social responsibility to ensure the quality of public debate. All segments of society should have access to public debate even if discriminatory barriers exist, including on the basis of gender. The media has a responsibility to report on discrimination and human rights violations and should raise awareness of the harm caused by negative stereotyping. To prevent the furthering of discriminatory views the media can avoid unnecessary references to "protected characteristics" like race, religion, and gender and seek to give disadvantaged groups a voice.

Speak out against injustice

Once the preconditions are set for an open and free public debate, religious leaders, political figures and other stakeholders are encouraged to use their positions in society to influence norms on religious tolerance. Political and religious leaders should refrain from using messages of intolerance or expressions which may incite discrimination, hostility or violence[61]. Government agencies have a responsibility in speaking out firmly and promptly against intolerance, discriminatory stereotyping and instances of hate speech, especially in cases of communal attacks. Silence, delayed or lukewarm reactions can easily be perceived as tacit complicity by government agencies[62]. Instead, political and religious leaders should defend the rights of minorities and their right to participate equally and effectively in cultural, religious, social, economic and public life[63]. By speaking out, leaders can help set the tone for future events. Leaders should make clear that violence, especially against minorities, is never acceptable.

To foster peaceful and diverse societies which uphold human dignity and equality for all, the UN system has initiated several projects that includes religious leaders, like the Beirut Declaration and its 18 commitments on 'Faith for Rights'[64]. Specific peer-to-peer learning resources include the #Faith4Rights toolkit (2020)[65] and the Fez Plan of Action for Religious Leaders and Actors to Prevent Incitement to Violence that Could Lead to Atrocity Crimes (2017)[66].

Interreligious dialogue and cooperation

Interreligious dialogue and cooperation have a huge peacebuilding potential and contribute to combating intolerance based on religion or belief. This is true not only across religious or life-stance divides, but also between different groupings of the same religion. Interreligious dialogue can pursue different purposes and take different forms, which all have advantages and limitations. Some initiatives focus on dialogue between top-level religious leaders, others bring religious groups together on joint charity projects, yet others might focus on preventing and responding to religious-based conflict. One of the main outcomes is trust and increased respect for religious diversity.

BEST PRACTICE

Responding to the threat of religious extremism

The Nigerian-based Islamic extremist group Boko Haram has wreaked havoc across the Lake Chad region since 2013. As a result, the civilian population in Maroua, in the Far North region of Cameroon, has suffered killings, loss of property, destruction of places of worship, rape and forced marriage, forceful implementation of the full-face veil for women and much more. Initially, the attacks created tension in the local population as the Christian minority felt targeted, and blamed Muslims for not taking responsibility. Muslims, on their part, felt that the Christians saw all Muslims as terrorists. Therefore, neither group actively supported the fight against the extremist movement. After substantial peacebuilding efforts by the Programme for Christian-Muslim relations in Africa (PROCMURA), the Christian and Muslim communities shifted their focus from blaming each other, to joining forces against a common enemy. The local communities formed joint monitoring groups to prevent the radicalization of youth and offered each other physical protection. On Fridays, while the Muslims are praying, the Christians guard the mosques. On Sundays, the Muslims return this favor while the Christians are praying.

Monitoring hate speech

With the rise of social media, the spread of hate speech, disinformation and fake news online is a growing challenge. In a globalized world, regulatory frameworks for social media platforms have been difficult to implement. Additionally, social media algorithms seem to encourage extreme expressions over more 'moderate' ones.

Most social media platforms have developed internal regulations and guidelines for how to balance hate speech with FoE on their platforms and are actively working to counter the spread of harmful speech online. However, it is important that such guidelines and their practical implementation are transparent to users and that they are in line with international human rights standards. Social media platforms have a responsibility to be transparent and accountable.

To supplement public legislation and social media businesses' own content moderation, civil society organizations can get involved with monitoring and reporting on online hate speech, hold businesses and duty bearers accountable, and engage in positive counter-speech efforts.

BEST PRACTICE

Social media monitoring by NGO's

The National Christian Evangelical Alliance of Sri Lanka (NCEASL) has partnered with Hashtag Generation (HG) to monitor harmful online content targeting religious minorities in Sri Lanka. This initiative focuses on documenting harassment, hate speech, advocacy of violence, and disinformation. From 2021 to 2023, HG reported 6,928 incidents of harmful content to Facebook, resulting in the removal of 2,896 posts. TikTok has shown an even stronger response, removing over 90% of harmful content flagged by HG. Through this collaboration, NCEASL and HG aim to create a safer online environment by actively addressing online harmful content targeting religious minorities in Sri Lanka.

Questions for reflection

1 What do you think would be strategic interventions in your context to combat religious intolerance?

2 Are you already engaged in such activities, or would you like to be? Who would you need to collaborate with or influence in order to make a difference?

3 What do you think are the biggest challenges for upholding FoRB and FoE today?

Continued learning

In order to create a society that respects pluralism, inclusion and non-discrimination, a sound understanding of the human rights framework is needed. The FORB Learning Platform offers a variety of online courses and downloadable learning resources on Freedom of Religion of Belief and human rights education in general. These learning resources are free of charge and come in many different languages, adapted to various audiences and contexts.

Students, partners and online users report having gained solid knowledge of the international human rights framework, a more comprehensive understanding of FORB issues and have successfully integrated the learning material in their work to promote FORB locally, nationally and internationally.

Explore the website www.forb-learning.org to find available courses, readings, customized learning materials, and more.

> *"I welcome this timely publication that highlights the complex yet complementary relationship between freedom of religion or belief and freedom of opinion and expression. A better understanding of fundamental freedoms on every level of society is the best safeguard we have to ensure the enjoyment of all human rights for everyone on an equal basis.*
>
> **Nazila Ghanea, UN Special Rapporteur on freedom of religion or belief (2022 – to date)**

Closing remarks

FoRB and FoE are interdependent rights, essential to any free and democratic society. Throughout this booklet, we have highlighted a number of situations where these fundamental rights are violated, sometimes one right at the expense of the other. The aim has been to spur reflection on why this happens and what we collectively can do to reverse negative trends. The booklet is meant as a conversation starter and introduction to a complicated topic. It has not tackled all complexities, for that a more comprehensive analysis is needed. We hope this booklet can offer guidance, inspiration, and perspective for understanding challenges that occur across different cultures yet are common in many parts of the world.

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Glossary and abbreviations

Atrocity crimes – a violation of International criminal law. Three types of crimes categorize as mass atrocities, namely genocide, war crimes, and crimes against humanity

CERD – Convention on the Elimination of all forms of Racial Discrimination

Coercion – the use threats or force to persuade someone

Continuum – something that changes in character gradually or in very slight stages without any clear dividing points

Conversion – to change one's religion or belief

Dalit – a group or class of people traditionally excluded from the Hindu caste system. Also known as "scheduled caste" or "untouchable"

Defamation – to damage the reputation of someone or something

Diaconal work – Social and humanitarian efforts, typically among the poor and disadvantaged, motivated by the Christian faith

Editorial media – Media that is curated, produced and controlled by professional editors, such as newspapers, magazines, and broadcast outlets

Hindu nationalism – a political ideology based on the Hindu ethnicity and religion

ICCPR – The International Covenant on Civil and Political Rights

Impunity – exemption or freedom from punishment

Indigenous groups – Indigenous Peoples are distinct social and cultural groups that share collective ancestral ties to the lands and natural resources where they live, occupy or from which they have been displaced

Islamophobia – anti-Muslim hatred and discrimination

Life stance – Religious or non-religious belief systems

OHCHR – United Nations Office of the High Commissioner for Human Rights

OIC – Organization of Islamic Cooperation

Orthodoxy – authorized or generally accepted theory, doctrine, or practice

Proselytism – attempting to convert people's religious or political beliefs

Protected characteristics – The term is used in non-discrimination legislation (especially in Europe) to prevent discrimination based on grounds such as sex, race, colour, language, religion or belief, political or any other opinion, birth, disability, age or sexual orientation.

Recant – to give up one's opinion or belief

Scapegoat – a person who is blamed for the wrongdoings, mistakes, or faults of others

UDHR – Universal Declaration of Human Rights

About Stefanus Alliance International

Stefanus Alliance International is a Christian mission and human rights organization based in Norway, with a special focus on freedom of religion or belief. Stefanus Alliance International fights for all people's right to have, change and manifest their beliefs. With our motto "together for the persecuted", we provide support, care and practical help to people and churches all over the world who are persecuted or oppressed because of their faith.

This booklet and more information about FORB can be downloaded on Stefanus Alliance International's webpage: www.stefanus.no/english.

You can also find this booklet along with numerous other learning resources and online courses on FORB at www.forb-learning.org.

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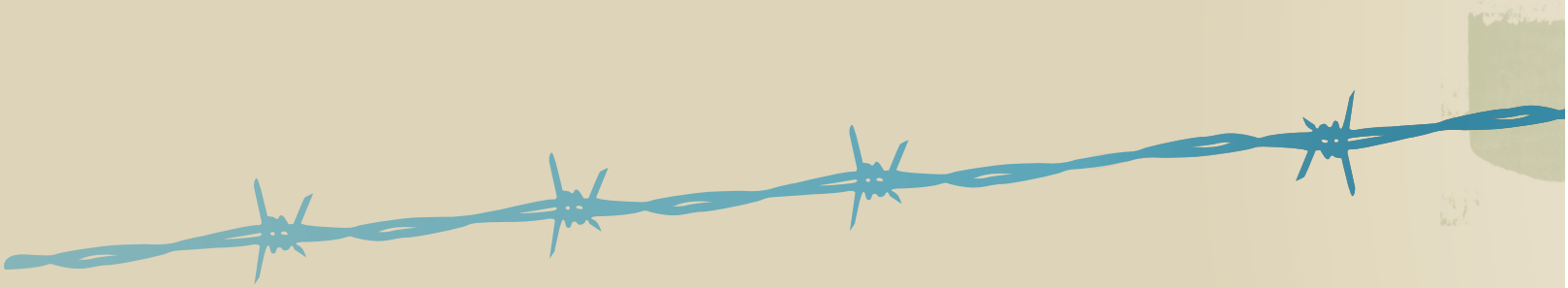

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