

"GENDER IDEOLOGY" NARRATIVES: A THREAT TO HUMAN RIGHTS

"Gender ideology" narratives are increasingly present in public discourse and policy-making spaces, posing a significant threat to human rights. The malleable concept of "gender ideology" casts advocates of gender and social justice as illegitimate proponents of a nefarious agenda.

For decades, feminist scholars and advocates have articulated important concepts related to gender to understand and challenge oppression and discrimination. Those concepts have now become the target of anti-rights actors who claim that oppressive patriarchal gender roles are "common sense", strategically painting all other ideas, cultural norms, and forms of social life as a dangerous, conspirative ideology.

Important to Know



The concept of "gender ideology"...

- is a manifestation of an oppressive ideology that opposes rights related to gender and sexuality
- defends ingrained patriarchal gender norms as natural, and works to delegitimize those that question these norms
- positions the patriarchal family as the norm, and all other forms of family life as "ideology"
- is used to provoke moral panic
- is used to undermine and attack rights defenders
- is used by anti-rights actors of different stripes: secular proponents as well as religious actors, and by some groups that identify as leftist or feminist, whilst more commonly associated with ultraconservative and right-wing agendas
- is employed against rights-based initiatives, from gender equality to economic rights and peace-building
- is used to influence elections or policy outcomes
- was created by anti-rights actors who threaten human rights and defenders, to claim they themselves are "under threat"
- ultimately undermines the universality of human rights: the foundation of international human rights law

Anti-rights actors construct "gender ideology" as an attack on the nation and traditions, as well as an attack on the family, marriage, and religious freedom. Across the board, these narratives rely on provoking uncertainty and fear, and are often combined with misinformation and sensationalism.

UN mechanisms recognize the negative impact of "gender ideology" narratives on rights related to gender and sexuality.1 The UN Working Group on Discrimination against Women and Girls has emphasized the obligation of states to "counter the narratives around gender ideology used by conservative lobbies to misinform and undermine the advancement of women's rights and gender equality."2 It also recommends that States "actively push back against conservative religious and racialized political ideologies that undermine gender equality" and "oppose misinformation and religious positions that subvert the sexual and reproductive health and rights of women and girls."3

Recently, the concepts of "gender ideology" and being "gender critical" have also been used by trans-exclusionary groups that identify with women's rights to question and attack the rights of trans people. Theses groups use a rhetoric of "sex-based rights" - founded on a belief that women are oppressed on the basis of sex, not gender - to undermine the rights of trans and gender non-conforming people. This argumentation upholds patriarchal notions of sex and gender, falsely pitting the rights of trans and cisgender women against each other and erasing the diversity of women's identities and bodies.

States and UN bodies must categorically expose and reject "gender ideology" narratives as attacks on human rights. These narratives are incompatible with international human rights law and seek to undermine already established rights.

CASE STUDIES

1. Legitimizing violence against women: the withdrawal of Turkey from the Istanbul Convention

"The development and the ratification of the Istanbul Convention was only possible due to immense efforts by the feminist movement in Turkey. Withdrawal from the Convention, that came through a single decision of the President, does not change this fact! Istanbul Convention is ours, and we'll continue to defend and uphold it!"

- Sehnaz Kiymaz, WWHR - New Ways Advocacy Consultant, United4IC member

What happened in Turkey?

On 20 March 2021, Recep Tayyip Erdoğan, Turkey's President, announced the country's withdrawal from the Istanbul Convention on preventing and combating violence against women and domestic violence,⁴ by presidential decision.⁵ This happened in a context where the rule of law has been under heavy attack for years.⁶

Who were the anti-rights actors involved?

Intense lobbying efforts against the Istanbul Convention had been going on for a number of years prior to Turkey's withdrawal, led by fundamentalist anti-rights groups with close ties to the ruling Justice and Development Party (AKP) party. In July 2020, the AKP spokesperson signalled that Turkey was considering withdrawing from the Istanbul Convention.

What were their arguments?

In its official communiqué, the Turkish government justified its decision by claiming the Istanbul Convention was used to "normalize homosexuality", and that, as such, it was "incompatible with Turkey's social and family values". This mix of cultural relativism - whereby "Western" values are claimed to be imposed on Turkish society - as well as the creation of a moral panic around a powerful imaginary "LGBT lobby" is typical of the arguments used by antirights actors.

How is this reaching beyond Turkey's national context?

The withdrawal of Turkey from the Convention is part of a coordinated backlash centered around the concept of "gender" in European countries and beyond. Poland has taken steps



Istanbul demonstration, 1 July 2021. The banner says: "We are not giving up on the Istanbul Convention, it is not over for us" Photo credit: Istanbul Convention Campaign Group Archive.

to withdraw from the Convention citing an "attempt by the LGBT community to impose their ideas about gender". In Hungary parliament refused to ratify the Istanbul Convention in 2020 after the government described it as promoting "destructive gender ideologies" and "illegal migration".8

Want to know more?

Why Turkey's withdrawal from the Istanbul Convention is a global problem, Özlem Altan-Olcay and Bertil Emrah Oder, OpenDemocracy, 2 June 2021.

Withdrawal from the Istanbul Convention: War on Gender Equality in Turkey, Berfu Şeker and Ezel Buse Sönmezocak, Policy Brief Series from Freedom House, June 2021.

2. Banning of gender and comprehensive sexuality education in Paraguay

"The prohibition of "gender" in education in Paraguay is a clear example of the actions of anti-rights groups. The ban has the effect of creating a taboo on the topic of gender, preventing the discussion of several important issues, such as comprehensive sexual education or gender violence, in schools."

- Mirta Moragas Mereles, Director of Policy and Advocacy of Synergía, Initiatives for Human Rights

What happened in Paraguay?

In October 2017, Paraguay became the first country in the world to ban teaching about gender from school lessons. This came into force via a government decree prohibiting "the distribution and use of printed or digital materials related to gender theory and/or ideology in public educational institutions."9 This effectively stopped all efforts to implement comprehensive sexuality education in a country facing extremely high rates of teenage pregnancies and sexual violence. Likewise, the topic of gender became a taboo in the school environment, preventing discussions on gender violence issues. 10 In 2017, the CEDAW Committee in its seventh periodic report on Paraguay noted that the country was "facing a backlash on women's rights in legislation and political and daily life."

Who were the anti-rights actors involved?

The ban came after months-long anti-rights campaigns which targetted teaching guidelines and teacher training on rights-based sexual education, including principles of gender equality and non-discrimination. Leaders of the campaign against "gender ideology" in schools included the Catholic Church and a Paraguayan

coalition called "Somos Muchos Muchos Más" (roughly translated as "We are Many Many More"), the latter coordinated by evangelical pastor Miguel Ortigoza, a known anti-rights figure in Paraguay. 11 Paraguayan conservatives groups were also supported by the US-based anti-rights group Alliance Defending Freedom (ADF), 12 which provided legal arguments in a memo, as revealed by investigative journalists in *Open Democracy*. 13

What were their arguments?

Clearly misrepresenting the international legal framework, ADF's 2017 memo argued that the CEDAW convention "never mentions gender", which is "a failed vision that has been adopted by international institutions... [that] deny the biological nature of persons." Paraguay, it claims, has "no legal obligation" to teach students about gender equality.

In public discourse, the main arguments used to justify the decree included "the family in danger" and "protecting Paraguayan sovereignty." Then Minister of Education, Enrique Riera, fostering the ongoing moral panic, declared during a public hearing that he "would burn in public squares the books containing gender ideology."

How is this reaching beyond Paraguay's national context?

ADF has a strong presence and influence in Latin American political and legal debates and also manages to infiltrate and target the Organization of American States (OAS). ¹⁵ Other countries have been the stage of similar attacks on Comprehensive Sexuality Education (CSE), notably Brazil, Canada, Mexico, Slovakia, Spain, Uruguay, Hungary, and Romania, although not always victorious. Family Watch International, a US-based anti-rights group, has also launched petitions against CSE in 13 countries, mainly in Africa.

Want to know more?

How Paraguay became a 'lab for anti-rights ideas', Diana Cariboni, OpenDemocracy, 28 January 2021

Anti-gender Politics in Latin America: the case of Paraguay, Lilian Soto and Clyde Soto, Sexuality Policy Watch (2020). Summary in English and complete study in Spanish.

3. Anti-trans mobilization against reform of the Gender Recognition Act in the United Kingdom

What happened in the United Kingdom?

In 2018, the UK government conducted a consultation on reforming the 2004 Gender Recognition Act (GRA). The GRA governs the mechanism by which trans individuals may obtain a Gender Recognition Certificate (GRC), 16 a process experienced by many as "overly intrusive, humiliating and administratively burdensome."17 Ultimately, the government announced only minor administrative changes. meaning the highly medicalized elements of the process would remain,18 despite a strong majority of respondents supporting reforming these aspects.¹⁹ The decision was criticized by prominent LGBTQI organizations,20 human rights groups,21 and LGBT groups from all major political parties.²²

It is widely considered that the disappointing outcome of the GRA consultation process was a result of coordinated pressure from anti-trans groups, who conducted campaigns based on misinformation and fear-mongering, in the context of an already toxic public debate.²³ In the four-year period 2018-2021, transphobic hate crimes quadrupled in the UK.²⁴

Who were the anti-rights actors involved?

Much of the opposition came from organized campaigns of "gender critical" activists, many of whom (although not all) identify with the women's rights sphere.²⁵ Opposition also came

from conservative religious groups, particularly Christian groups. One analysis of the Scottish GRA consultation found that roughly half of the anti-reform submissions came from Christian conservative groups, while the other half were submitted by trans-exclusionary groups that identify with women's rights.²⁶

What were their arguments?

Groups opposing GRA reform focused on alleged danger to women-only spaces, marriages, families, and the safety of cis women and children. Objections went far beyond the remit of the GRC process, questioning the very identity of trans people and their right to exist, and employing dangerous discriminatory rhetoric. A submission from Heather Brunskell-Evans, co-founder of anti-trans advocacy group Women's Human Rights Campaign (now known as Women's Declaration International, hereon referred to as WHRC/WDI) called for the elimination of "transgenderism", for example.27 Prominent anti-trans campaign group LGB Alliance took out adverts in national newspapers suggesting that GRA reforms would "give predators the green light."28

Some of the groups involved explicitly employ the notion of "gender ideology." Others use notions of "transgender ideology", ²⁹ a "gender agenda", or a "trans lobby"³⁰ which operate in a very similar way, constructing an imagined conspiratorial trans cabal trying to enforce a

dogmatic worldview, silence critics, and prey on young people.³¹

How is this reaching beyond the UK national context?

There is evidence that the agenda of British "gender critical" activists is being exported globally. LGB Alliance affiliate groups are emerging around the world.32 WHRC/WDI has a global web of supporters, and has held events at the UN Commission on the Status of Women that promoted extreme anti-trans misinformation.33 Their International Declaration co-opts the the Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW) framework to claim that "sex" is an immutable category and "gender" is not a legitimate concept. Trans-atlantic collaboration between religious fundamentalists, such as Mormon lobby group United Families International and anti-trans group Women's Liberation Front (WoLf), has also been observed in UN spaces.34

Want to know more?

UK: Gender recognition reforms a 'missed opportunity', say human rights organisations, Amnesty International, 22 September 2020

Trojan horses in human rights spaces: anti-rights discourses, tactics and their convergences with trans-exclusionary feminists by Umyra Ahmad, AWID, 17 June 2021

"The Links Between Anti-trans Feminists and Christian Fundamentalists" by Inna Michaeli and Fenya Fischler, in *Rights at Risk: Time for Action (Observatory on the Universality of Rights Trends Report)*, AWID, 2021

RELEVANT HUMAN RIGHTS STANDARDS

Gender is a concept enshrined in international human rights law.

UN Human Rights mechanisms have developed a robust understanding of "gender" as a sociocultural construct that assigns roles, behaviours, forms of expression, activities and attributes according to the meaning given to biological sex characteristics.35 It is recognized as an "evolving [...] construct that justifies inequality and provides a means to categorize, order and symbolize power relations."36 Human rights norms have addressed discrimination based on gender, gender identity, and gender expression. The notion of discrimination being prohibited on the grounds of "sex" has evolved considerably to cover not only physiological characteristics but also the social construction of gender stereotypes.37

The international human rights framework recognizes and protects rights related to gender and sexuality. Bodily autonomy is a foundation of gender equality —including the right to health and the right to live free from violence.

The right to bodily autonomy includes:

- the right to have full control over and decide freely on all matters relating to sexuality and sexual and reproductive health, free from discrimination, interference, coercion and violence³⁸
- the right to be free from torture, nonconsensual medical treatment and experimentation³⁹
- the guarantee of universal access to sexual and reproductive health-care services⁴⁰
- the right to receive Comprehensive Sexuality Education (CSE), as recalled in the 2019 UN Human Rights Council resolution 41/17⁴¹, 2018 UN Human Rights Council resolution 38/5⁴², and 2018 UN Human Rights Council resolution 39/10⁴³.

States have the obligation to remove legal barriers and develop and enforce policies, good practices, and legal frameworks that respect bodily autonomy.⁴⁴

An intersectional approach to the protection of rights related to gender and sexuality is key to addressing multiple and intersecting forms of injustice and inequality, including those based on gender, sexuality, race, ethnicity, national origin, ability, age and class.

The Human Rights Council has developed a comprehensive recognition of intersecting and systemic discrimination in law and practice and has recommended to States and UN bodies to apply intersectional perspectives.⁴⁵

This means an understanding of discrimination must be achieved through an awareness of all conditions that have created a complex system of oppressive structures that are multiple and simultaneous.

States have the obligation to "review all proposed and existing legislation in accordance with international human rights obligations, using an intersectional approach that takes into consideration age, gender and the historical, social, economic, cultural and political contexts of women's and girls' realities."⁴⁶

Other resources

- My Body is My Own: Claiming the Right to Autonomy and Self-Determination, UNFPA, 2021
- Human Rights Council resolution 17/19 on Human rights, sexual orientation and gender identity,
 2011
- Human Rights Council resolution 27/32 on Human rights, sexual orientation and gender identity,
 2014
- Discrimination and violence against individuals based on their sexual orientation and gender identity: report of the Office of the United Nations High Commissioner for Human Rights, Submitted pursuant to Human Rights Council resolution 27/32, 2015, A/HRC/29/23, paras. 21, 78 and 79
- General Assembly resolution Extrajudicial, summary or arbitrary executions, 2014, A/RES/69/182
- Committee on Economic, Social and Cultural Rights, General comment No. 20, Non-discrimination in economic, social and cultural rights (art. 2, para. 2, of the International Covenant on Economic, Social and Cultural Rights), 2009, para. 27 and 32
- Committee on Economic, Social and Cultural Rights, General comment No. 22, on the Right to sexual and reproductive health (article 12 of the International Covenant on Economic, Social and Cultural Rights), 2016, paras. 23 and 40
- Committee on the Rights of the Child, General comment No. 15, on the right of the child to the enjoyment of the highest attainable standard of health (art. 24), 2013, para. 8
- Committee on the Rights of the Child, General comment No. 20, on the implementation of the rights of the child during adolescence, 2016, paras. 33 and 34
- Committee Against Torture, General comment No. 2 on Implementation of article 2 by States parties, 2007, para. 21

Endnotes

- Human Rights Council Resolution 38/46 A/HRC/38/46, Human Rights Council Resolution 47/27 A/HRC/47/27, and Report of the Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity, Victor Madrigal-Borloz, Practices of exclusion A/76/152
- 2 Human Rights Council Resolution 38/46 A/HRC/38/46
- 3 Human Rights Council Resolution 47/38 Women's and girls' sexual and reproductive health rights in crisis A/HRC/47/38
- 4 The Istanbul Convention, a Council of Europe (CoE) treaty on preventing and combating violence against women and domestic violence, sets comprehensive standards for protecting women against all forms of violence.
- 5 Many experts have criticized this move as unconstitutional. See, for example, *Turkey's withdrawal from Istanbul Convention a setback* for women and girls' human rights, International Commission of Jurists, 1 July 2021
- 6 Berfu Şeker and Ezel Buse Sönmezocak, Withdrawal from the Istanbul Convention: War on Gender Equality in Turkey, Freedom House, June 2021
- 7 "How the Istanbul Convention became a symbol of Europe's cultural wars", Maïa de la Baume, Politico, 12 April, 2021.
- 8 Ibid.
- 9 The text of the government decree is available here: https://www.mec.gov.py/sigmec/resoluciones/29664-2017-RIERA.pdf
- 10 Una niña embarazada es una niña abusada: este es el lema de Ñañangareko, la campaña de UNFPA Paraguay sobre el embarazo precoz, UNFPA, 8 October, 2020.
- 11 See N. Shameem et al., Rights at Risk Time for Action: Observatory on the Universality of Rights Trends Report 2021, AWID, 2021, p. 168
- 12 ADF has been declared a hate group by the Southern Poverty Law Center and in 2018 had its application to be an NGO with participatory status at the Council of Europe rejected because it did not "meet the requirement to respect and defend the values and principles of the Council of Europe". See: Communication to the Committee of Ministers, the Parliamentary Assembly and the Congress of Local and Regional Authorities, Implementation of Committee of Ministers' Resolution (2016)3 on participatory status for international non-governmental organizations with the Council of Europe, SG/Inf(2018)22, 29 June 2018.
- 13 How Paraguay became a 'lab for anti-rights ideas, Diana Cariboni, OpenDemocracy, 28 January 2021
- 14 Causa Abierta: Censura al género en la enseñanza pública de Paraguay, Articulación Feminista Marcosur
- 15 According to an OpenDemocracy investigation published in October 2021, ADF is one of twenty US Christian right groups that spent at least \$44 million in Latin America over the period 2007–18. How Paraguay became a 'lab for anti-rights ideas, Diana Cariboni, OpenDemocracy, 28 January 2021
- 16 In the UK, obtaining a Gender Recognition Certificate (GRC) means a trans person is legally recognised in their "acquired" gender and can obtain a new birth certificate showing that gender.
- 17 Catherine Fairbairn, Doug Pyper, and Bukky Balogun, *Gender Recognition Act reform: Consultation and outcome (Research Briefing)*, 17 February 2022, House of Commons, p. 5. Under the GRA Act 2004, an individual must apply to a panel providing medical evidence of a diagnosis of gender dysphoria and proof of them "living as" their identified gender for at least two years.
- 18 On 22 September 2020, Elizabeth Truss, Minister for Women and Equalities, made a written ministerial statement and the Government Equalities Office published an Analysis Report of Consultation Responses by researchers at Nottingham Trent University. The announcement also confirmed that legal recognition would also not be extended to non-binary people or under 18s. Gender recognition is a devolved matter, meaning legislation in this area may be made by the Scottish Parliament. In March 2022, The Gender Recognition Reform (Scotland) Bill was introduced which would drop the need for medical and psychiatric reports, reduce the waiting time from two years to three months and allow 16- and 17-year-olds to apply.
- 19 64.1% said that there should not be a requirement for a diagnosis of gender dysphoria. 80.3% respondents were in favour of removing the requirement for a medical report, which details all treatment received. 78.6% supported removing the requirement for individuals to provide evidence of having lived in their acquired gender for a period of time. Catherine Fairbairn, Doug Pyper, and Bukky Balogun, Gender Recognition Act reform: Consultation and outcome (Research Briefing), 17 February 2022, House of Commons, p. 33.
- 20 Stonewall statement on Gender Recognition Act reform, Stonewall, 22 September 2020, Consortium's response to Government's announcement on GRA reform, Consortium, 22 September 2020.
- 21 Amnesty International, Liberty and Human Rights Watch called out the "missed opportunity" to comply with human rights standards. *UK: Gender recognition reforms a 'missed opportunity', say human rights organisations*, Amnesty International UK, 22 September 2020
- 22 LGBT Groups from across UK political parties expressed "disappointment and anger" at the announcement via a cross-party letter. Ben Hunte, *Gender Recognition Act: LGBT political group anger at trans law 'changes'*, BBC, 20 June 2020.
- 23 On the UK climate, see: Sally Hines, Sex wars and (trans) gender panics: Identity and body politics in contemporary UK feminism, The Sociological Review Monographs 2020, Vol. 68(4) 25–43, pp. 32-33. For example of indicative news coverage, see Edie Miller, Why is

British media so transphobic?, The Outline, 5 November 2018. The Council of Europe also called out the UK by name, condemning the "highly prejudicial anti-gender, gender-critical and anti-trans narratives which reduce the fight for the equality of LGBTI people to what these movements deliberately mis-characterise as 'gender ideology'." Combating rising hate against LGBTI people in Europe, Resolution 2417 (2022).

- 24 Sian Norris, Far-Right Co-optation of the Transgender Rights Issue, Byline Times, 30 September 2021. While the increase in anti-trans hate crimes cannot be attributed only to the GRA debate, and likely points to the wider climate in the country, many trans and human rights organizations indicate the GRA debate to have been a significant flashpoint contributing to increasing discrimination and violence.
- 25 Katelyn Burns, The rise of anti-trans "radical" feminists, explained, Vox, 5 September 2019.
- 26 Some of their arguments were markedly similar. Claire Provost and Nandini Archer, *Christian Right and some UK feminists 'unlikely allies' against trans rights*, OpenDemocracy, 18 October 2018.
- 27 WHRC/WDI are an extreme anti-trans group, having made a submission to a UK parliamentary consultation calling for the elimination of "transgenderism", including any legal recognition or protection for trans people. WHRC/WDI co-founder founder Sheila Jeffreys referred to trans women as "parasites" at a meeting held in the UK parliament. Sarah Clarke and Mallory Moore, <u>ALERT: Transphobic Feminism</u> and Far Right Activism Rapidly Converging, Trans Safety Network, 18 March 2021.
- 28 Alliance mask slips as they turn to scare tactics in GRA debate, Pink Saltire, 6 March 2020.
- 29 See, for example, Joanna Williams' book *The Corrosive Impact of Transgender Ideology,* Civitas, 2020 and *The Stranglehold of Transgender Ideology in our Schools*, Transgender Trend, May 13 2022.
- 30 See, for example, Fair Play for Women loses census appeal, The Critic, 24 February 2022.
- 31 See, for example, Scotland's shame, The Critic, 4 March 2022.
- 32 Uncovered: LGB Alliance, Trans Safety Network, 28 December 2020.
- 33 Umyra Ahmad, *Trojan horses in human rights spaces: anti-rights discourses, tactics and their convergences with trans-exclusionary feminists*, AWID, 17 June 2021.
- The submission refers to 'gender theory' (the topic of the Independent Expert's report) as a "political religion" and a "doctrine", and equated "gender identity theory" being "imposed" by Geneva with blasphemy laws being imposed by states. Submission to the United Nations Independent Expert on Sexual Orientation And Gender Identity to inform the Independent Expert's report to be presented to the 47th session of the Human Rights Council, Women's Liberation Front, 14 March 2021.
- 35 See for instance: *The law of inclusion*, A/HRC/47/27, June 2021, Report of the Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity.
- 36 Report of the Special Rapporteur on extrajudicial, summary or arbitrary executions on a gender-sensitive approach to arbitrary killings, Agnès Callamard, para. 16, A/HRC/35/23, June 2017, as referenced in Comments to the Draft Crimes Against Humanity Convention in November 2018
- 37 Committee on Economic, Social and Cultural Rights, General comment No. 20, Non-discrimination in economic, social and cultural rights (art. 2, para. 2, of the International Covenant on Economic, Social and Cultural Rights), 2009, para. 20
- 38 Beijing Declaration and Platform for Action, 1995, para. 96; Human Rights Council Resolution 39/13, 2018, A/HRC/RES/39/13; and Human Rights Council Resolution on the Elimination of all forms of discrimination against women and girls, 2018, A/HRC/38/L.1/Rev.1
- 39 Committee on Economic, Social and Cultural Rights, General comment No. 14, 2000, The right to the highest attainable standard of health (article 12 of the International Covenant on Economic, Social and Cultural Rights) para. 8
- 40 Ibid
- 41 UN Human Rights Council resolution 41/17, Operative Paragraph 10(e)
- 42 UN Human Rights Council resolution 38/5. Operative Paragraph 10 (f)
- 43 UN Human Rights Council resolution 39/10, Operative Paragraph 12
- 44 Human Rights Council Resolution 39/13, 2018, A/HRC/RES/39/13, and Human Rights Council Resolution on the Elimination of all forms of discrimination against women and girls, 2018, A/HRC/38/L.1/Rev.1
- 45 Human Rights Council resolution 32/2 on Protection against violence and discrimination based on sexual orientation and gender identity and Human Rights Council resolution 41/18 on the Mandate of the Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity
- 46 Human Rights Council Resolution 44 on the Elimination of all forms of discrimination against women and girls A/HRC/44/L.21