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In and Out of the Homosexual Closet: Gay/Lesbian Liberation in Canada



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Article abstract

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In and Out of the Homosexual Closet: Gay/Lesbian Liberation in Canada

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With a substantive focus on Canada, this paper analyzes the sequential social processes involved in the movement for Gay/Lesbian liberation from a human rights perspective.

In Phase One (Into the Closet), the paper examines the process of stigmatization of homosexuals whereby their minority status is socially created, institutionalized and perpetuated.

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Avec l'accent sur le Canada, cet article analyse les processus sociaux successifs qui font partie du mouvement de libération des gais et des lesbiennes, d'une perspective des droits de la personne.

Dans la première phase («Into the Closet»), l'auteure analyse le processus de stigmatisation des homosexuels par lequel leur statut de minorité est créé, institutionalisé et perpétué.

Dans la deuxième phase (« Out of the Closet »), l'auteure analyse le processus de « déstigmatisation » et « Coming Out » par lequel un sens collectif d'identité homosexuelle, nouveau et positif, est généré.

Dans la troisième phase (Libération de la Minorité), l'auteure trace l'évolution des organisations homosexuelles des premières étapes de groupes qui s'entraidaient, aux organisations des droits Gais/Lesbiennes qui demandaient la reconnaissance et la protection légale des droits de la personne pour les homosexuels, jusqu'au mouvement actuel pour la libération des Gais/Lesbiennes qui demande la légitimation des styles de vie alternatives et des sous-cultures de la collectivité des Gais/Lesbiennes.

Introduction: Stigmatized Minorities

From a human rights perspective, the minority concept can be applied to any human population whose members' fundamental human rights have been categorically violated on the arbitrary basis of unsubstantiated, majority (or dominant group) assumptions about its members' shared character-

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istics. Once negative, majority-created labels are imposed, they give rise to minority stigmata which, in turn, provide majority authorities with a *legitimate* rationale for institutionalized forms of discrimination against minorities. As a result, over the long term, stigmatized minorities become locked into a subordinate societal status, characterized by economic, political and/or social disadvantage.

From this view, minority status is conceptualized as a socially-created phenomenon, rooted in majority prejudice and perpetuated through collective discrimination.

Traditionally, the concept of minority status was employed by social scientists to refer to the subordination of stigmatized racial and ethnic groups — involuntary groups of people whose collective stigmata derived from majority assumptions about members' innate, immutable bio-cultural inferiority. Sagarin (1971) was among the first social analysts to extend the minority concept beyond the racial/ethnic domain so as to include similarly stigmatized, similarly disadvantaged, non-ethnic populations.

Until Sagarin's re-conceptualization of stigmatized non-ethnic groups, these social categories had been studied from the perspective of social deviance, rather than from the approach of majority/ minority relations. Probably the most widelyemployed model of social deviance, in recent years, has been the one based upon labeling theory.

Into the Closet... Labeling and Stigmatization

Built into the labeling model of social deviance is the central thesis that stigmatization gives rise to a self-fulfilling prophecy whereby members of "deviant" minorities, once labeled, eventually come to internalize, identify with and "act out" the stigmatized roles associated with the derogatory labels imposed upon them (Goffman, 1961). Following upon this, they come to pursue "deviant careers" (Lemert, 1967). The self-fulfilling prophecy of minority status becomes full-blown with the development of a "deviant" sub-culture which minority members come to embrace as a personally appropriate (alternate) lifestyle (Goffman, 1963). A "deviant" sub-culture, by definition, lacks social legitimacy; minority members therefore employ a host of deceptive mechanisms in order to keep nonconformist lifestyles hidden from public view. What results is the creation of a "closet" designed to protect sub-cultural activities from exposure to majority censure and to protect minority members from exposure to majority degradation and discrimination.

From a human rights perspective, the labeling

theory approach, while useful in analyzing the process through which stigmatized identities and sub-cultures are created, can be seen to have some serious limitations. Because of the implicit assumption that the self-fulfilling prophecy of minority stigmatization is virtually irreversible, no systematic effort has been made by labeling theorists to address the processes of delabeling and relabeling whereby minority identities become destigmatized and rehumanized.

Delabeling and Relabeling: Towards Positive Minority Identities

Trice and Roman (1970) identify three social mechanisms through which successful delabeling and relabeling can occur: 1) Changes in majority norms of "deviance"; 2) Official/Professional delabeling of persons formerly labeled "deviant"; and 3) Adoption of normative lifestyles by persons previously engaged in non-normative behaviours. This model addresses an important transitional stage in the process of minority liberation, a stage where the focus of minority attention is on presenting a normative front in order to prevent majority discrimination. But the model falls short of addressing the processes whereby alternate, nonconformist lifestyles and sub-cultures can gain societal legitimation. Insofar as behavioural conformity to majority norms implies rejection by minority members of the legitimacy of minority cultural alternatives, social mechanisms (like minority self-help groups) predicated on dominant conformity are not designed to promote the goal of minority cultural liberation. In order for minorities to effectively pursue a goal of cultural liberation, substantial numbers of minority members must come to embrace the minority sub-culture as affording legitimate lifestyle alternatives to those of the established, majority culture. Further, in order to convince majority members of the legitimacy of minority cultural alternatives, minority members must come out of the closet and openly lobby for minority cultural rights.

Coming Out of the Closet

Plummer (1975) argues convincingly that, for stigmatized minorities, "coming out" is far easier said than done: The cloak of secrecy provided by the closet enables minority members to pursue alternate, non-conformist lifestyles, which, exposed publically, would bring majority condemnation and harassment, if not more severe punitive measures. However, Plummer continues, closeted life is not without its own, negative, psycho-social consequences, for it is

predicated on a fragile facade of secrecy. In order to maintain their secret private lives, minority members typically attempt to "pass" for majority members in their public, workaday lives. What results is the "double life syndrome": in private, minority identities and lifestyles are expressed; in public, pseudo (majority) identities are fabricated and majority lifestyles are pursued. But, leading a double life involves the constant employment of mechanisms of deception and the constant fear of exposure of the secret. Almost inevitably, the minority member becomes filled with feelings of shame, guilt and selfhatred for the fabrication of an existence based upon layer after layer of deceit. Over time, the closet may become psychologically intolerable; thus, minority members may be propelled out of the closet in order to obtain psychological, psychiatric or spiritual guidance, or to seek social support. In the latter instance, minority members may gravitate towards minority self-help groups.

Stigmatized minorities may develop a variety of organizations designed to afford social support to members during the difficult process of coming out. Ponse (1978) differentiates between two key types of minority organization, secretist (closeted) and activist (open). Ponse points out that, in the early phase of coming out, minority members may be willing to make disclosures about their stigmatized identities only to a few selected and trusted insiders (other minority members). In this phase of coming out, secretive organizations can provide critical support in the development of new, positive minority identities. In the second phase of coming out, activist organizations which encourage members to come out publically, can provide the necessary role-models and support systems enabling minority members to openly declare their newfound pride in minority identity. Given this kind of social support, more and more minority members may come to undertake activist, lobbying activities designed to attain minority rights and minority cultural liberation.

The Evolution of Minority Liberation 1

Minority Rights movements may be designed to achieve social reforms (e.g., specification of the defining criterion of minority status under the non-discriminatory grounds of human rights legislation) or they may be designed to attain cultural liberation (e.g., legitimation of non-conformist lifestyles and alternate sub-cultures). Movements germinate in minority consciousness of oppression and in the bubbling over of minority discontent with persistent violations of member's individual and collective human rights.

Minority discontent initially tends to be

generalized and lacking in specific focus. Before collective demands for social change can be put forward by minority leaders, widespread group consciousness of oppression must be mobilized and directed towards "justifiable" group goals.

When the collective goal is articulated as one of social reform, minority leaders generally evince strong support for societal *ideals*: what they take issue with is the non-fulfillment, indeed, the *abrogation* of these ideals, through systemic discrimination against the minority groups they represent.

In the current Canadian context, support by minority leaders for established, "liberal-democratic" ideals lends legitimacy to their demands for recognition and protection of the fundamental human rights of the minority they represent. Thus minority leaders can, justifiably, put forth demands for specified legal protections of human rights such as the inclusion of the defining criterion of minority status (e.g., sexual orientation, in the case of the homosexual minority) among the specified prohibited grounds of non-discriminatory legislation.

Attempts by minority leaders to effect more radical changes in the social order do not usually occur until reformist goals have either been achieved or until all attempts do achieve them have utterly failed.

In the Canadian context, current demands by minority leaders for specified protections for the collective cultural rights of the minority they represent tend to be seen as "radical" in the light of traditional "liberal-democratic" ideologies. Thus, attempts by minority leaders to gain societal-wide recognition of the legitimacy of minority subcultures (e.g., Gay and Lesbian lifestyles) tend to meet with formidable majority opposition. Yet, the current social climate of Canadian society is not unaffected by the increasing pressure for legal and constitutional guarantees for cultural diversity emanating from diverse aboriginal, immigrant and non-ethnic minorities. Canada's official espousal of the "multicultural" ethos (its staunch "liberaldemocratic" opponents notwithstanding) lends credence in the current social context to minority demands for formal guarantees for their collective expression of legitimate cultural alternatives.

Minority liberation movements germinate, arise, flourish and fail within the ideological and structural parameters of a given society at a given time. Thus, in order to understand the process of minority liberation, in any given case, attention must be paid to the receptivity of majority authorities and of the public-at-large to the kinds of demands put forward by minority leaders. Equally importantly, attention must be paid to the perceived legitimacy of the minority community per se; the nature of minority

demands may be an irrelevant consideration if the prevailing social climate is hostile to the minority community, as such.

The Paradigm: A Sequential Scheme for Minority Liberation

Building upon the theoretical ideas outlined in the foregoing pages, the author has developed a conceptual design for the analysis of the processual steps or stages in the evolution of minority liberation movements. This conceptual framework is represented schematically in Diagram I.

Using this scheme as a guideline for the analysis to follow, the author will trace the sequential processes of Gay and Lesbian liberation in Canada through three stages: Phase one (Into the Closet); Phase two (Coming Out) and Phase three (Cultural Liberation).

Phase One: Into the Closet Labeling and the Social Creation of the Homosexual Minority

In Western societies, the minority status of

homosexuals traditionally stemmed from the Judaeo-Christian tradition which affirmed the heterosexual, monogamous, faithful marital union as the norm for intimate sexual relationships. From this stringent religious position, all deviations from the sexual norm were seen as sinful, but deviations in the form of acts between persons of the same sex were deemed more than sinful, they were believed to be unnatural, "beyond the pale", for human beings. In effect, they were defined as a sin against nature, and, as such, abhorrent (Baum, in Batchelor, 1980: 22).

In the latter part of the nineteenth century, Benkert, a Hungarian doctor responding to the new spirit of social reform in Europe, coined the term "homosexual" to refer to sexual acts previously condemned by the Church as unnatural, perverse, sinful, and, concomitantly, prohibited by law. As he conceptualized it, the new term homosexuality symbolized a "natural" human condition: he argued that homosexuality, like heterosexuality, is inborn, not acquired; hence it cannot be held to pose any threat to heterosexual society and it should not be regarded as a punishable offence by "rational persons" (Lauristan and Thorstad, 1974: 7). The presence of homosexuality in all known human

DIAGRAM I In and Out of the Closet: A Sequential Scheme for Minority Liberation

Phase One

Becoming a minority

- i Labeling Stereotype and stigma follow
- ii Discriminatory treatment and control; voluntary or involuntary social isolation guarding the secret (the closet)
- iii Internalization of stigmatized identity and acting out/ of stigmatized role/ "Passing" in the outside world and leading a "double life"
- iv Becoming involved in the minority sub-culture/ adopting an alternate lifestyle (The selffulfilling prophecy)

Phase Two

Coming Out

- i Efforts to raise group consciousness of oppression Developing a positive minority identity
- ii Group level stigma conversion The creation of social mechanisms for collective delabeling and relabeling

Phase Three

Towards Human Liberation and Group Empowerment

- i Out of the closet:Individual disclosures/open identity to outsiders
- ii Group mobilization towards minority protest
- iii Contention: seeking protection for fundamental human rights (individual rights)
- iv Revitalization: seeking group legitimation and protection for alternate sub-culture/lifestyles (collective cultural rights)

cultures, Benkert contended, is proof that it deserves the same recognition as a natural human phenomenon as does heterosexuality.

Following Benkert's coining of the term "homosexual", this concept became widely adopted by professionals, particularly doctors and psychiatrists. As employed by these majority "experts", however, the connotation of the term homosexual soon became modified so as to accord with their general agreed-upon view that homosexuality was a less acceptable form of sexual behaviour than was heterosexuality (Altman, 1982: 4).

In the decades to follow, under the influence of the medical profession, homosexuality became redefined as a psychological "illness" or a "maladjustment". As this medical definition gained more and more professional adherents, the stereotype of the "sick homosexual" became widespread. This medical reconceptualization of the term, homosexuality, virtually reversed its original connotation, for it returned the notion to the realm of the unnatural or abnormal. Moreover, because of the underlying assumption of voluntariness, homosexuality became viewed as an illness that could and should be cured (lbid.).

As a popular belief, the concept of homosexuality as a sickness that should be cured remains very widely held even in the 1980's, despite increasing scientific challenges, over the last two decades, which have persuaded a great many medical, psychological and psychiatric authorities and their professional associations to abandon this definition (Batchelor, 1980).

In one way or another, all of the majorityimposed labels and definitions of homosexuality have served to *invalidate* the minority so-defined. Moreover, majority authorities have inevitably been able to mobilize prevailing homophobic prejudices (morbid fear and hatred of homosexuals) and myths in order to provide a ready "rationale" whereby discriminatory measures against homosexuals could be justified.

Homophobic Invalidation Myths

Among the most commonly held myths underscoring discrimination against homosexuals in Canada today, are the following: (As a group)...

- 1) homosexual men are effeminate and homosexual women are masculine
- 2) homosexuals are obsessed with sex
- 3) homosexuals recruit other people to homosexuality
- 4) homosexuals are child molesters (Canadian Human Rights Commission, 1979: 24)

Such myths are employed by educational

authorities and other (potential) employers in order to justify denial of job opportunities to homosexuals.

The seemingly widespread homophobic fears of parents and educational authorities that homosexual teachers will turn their pupils into homosexuals, or will sexually attack young students, or both, rests on the erroneous assumptions of myths #3 and 4. Yet, there is no scientific evidence to support either of these assertions. Indeed, the evidence suggests the contrary. Research on children of homosexual fathers, for example, show no evidence of sexual molestation of the young; nor do the young turn out to be homosexuals, in disproportionate numbers. Similarly, research supporting the statistical evidence reveal that most sexual offences against children are perpetrated by heterosexual males, often relatives of the victim (*Ibid.*: 24-5).

Despite the fact that these invalidation myths are unfounded in fact, the fears and the hatred they generate are deeply imbedded in the public psyche; accordingly they provide the catalyst for acts of blatant discrimination against homosexuals, especially in work environments involving direct contact with children. (Coalition for Gay Rights in Ontario [CGRO] March, 1978: 12 and Appendix A-D).

Because of a wide range of homophobic myths which depict homosexuals as "dangerous", as posing a "threat" to the society-at-large, discriminatory measures against this minority often take the form of criminal legal sanctions.

While the sexual and affectional preference of homosexuals for members of their own gender has never been demonstrated to pose a real danger to the heterosexual majority in Canada, Canadian homosexuals have long been publicly perceived as criminals. This perception is fed by the continuing fact that homosexuals are subject to legal discrimination under Canada's Criminal Code (Sections 155-158 and 193, regarding buggery, gross indecency, age of consent, and bawdy houses). While it is not a crime to be a homosexual in Canada, pursuing one's homosexuality by way of engaging in prohibited sexual behaviours can result in the imposition by majority authorities of discriminatory legal sanctions.

Discrimination in law against homosexuals has its direct parallel in prejudicial law enforcement. "Harassment" and "entrapment" by police officers reportedly constitute particularly insidious forms of discrimination against homosexuals throughout North America (Niederhoffer, 1967).

Discrimination against homosexuals, in the form of police harassment, may invoke violations of the legal rights of homosexuals, for example, the right to security of person and the right to be secure against unreasonable search or seizure.

Police harassment can be defined as the selective surveillance of persons, based not upon realistic probabilities, but upon the prejudices and stereotypes held by the (majority) community towards members of a particular minority group (Sepejak, 1977: 21). Homosexual establishments — like bars, baths and discos - where clientele pursue an alternate sexual lifestyle — are frequently surveyed, not only for violations of sex laws, but under several other "legitimate" pretexts such as the possession and display of liquor licences or the serving of alcohol to minors. Harassment, as a form of collective discrimination, is involved where there is evidence that establishments catering to homosexuals are surveyed more frequently for possible legal violations than are parallel establishments catering to the heterosexual majority (Ibid.).

The continuing Canadian saga of police harassment of homosexuals culminated, in 1981, with a series of raids on gay baths in Toronto in which private property was smashed, "found-ins" were charged and exposed to public ridicule and "keepers" were dragged through the courts under antiquated and rarely invoked "bawdy house" laws.

Following the raids, an editorial in the Globe and Mail, headed: "Heavy Hand of the Law", pointed to the unusually large number of police involved in the raids; to the unusually large number of arrests, to the unnecessary violence and destruction involved in police use of sledgehammers and crowbars to smash doors and windows and to the fact that no such raids have been made on heterosexual bawdy houses in Toronto. In closing, the editorial suggested that other minorities might wonder if

"so gross an action against so many citizens by such a large group of policemen with the support of the Chief of Police... means that no minority is safe from harassment in a city where it could happen" (Globe and Mail, Editorial, February 9, 1981).

Derogatory labels, like "faggot" and "queer", "butch" and "dyke", have acquired salience in the context of invalidation myths used to rationalize heterosexism — majority (heterosexual) discrimination against and degradation of homosexuals. But, beyond the denial of societal opportunities, heterosexist has had further, psychologically devastating consequences for homosexuals.

The Experience of Stigma The Closet of Secrecy

Probably the least well understood aspect of stigmatization is its psycho-social consequences for the individual bearer of stigma. Social scientific research in this area is particularly difficult to carry out because one of the manifestations of the problem is that it is often deliberately kept secret and hidden from public view.

Surrounded by stereotypes of sin, perversity, sickness and sadness, majority condemnation of homosexuality increasingly impinges upon and debases the homosexual person's self-image and self-identity (Plummer, 1975). Whether at the level of the "queer joke" or the sex education lesson that teaches about "perversions", the homosexual experience typically is presented as immoral, abnormal or, at the very least, "odd" (*Ibid*.: 143). Each source reinforces the "abnormality" of homosexuality and the "normality" of heterosexuality; thus a firm basis is laid for the casting of guilt, shame and even hatred on the self.

In the words of two homosexual persons:

"My upbringing [says Mary Meigs] prevented me from accepting my sexual nature by making me ashamed of it, doubly ashamed, because I belonged to a despised sexual minority."

(Meigs, 1982)

"A person cannot live in an atmosphere of universal rejection, of widespread pretence, of a society that outlaws and banishes his activities and desires, or a social world that jokes and sneers at every turn without a fundamental influence on his personality."

(A homosexual spokesman; Plummer, 1975: 142)

The all but inevitable consequence of social degradation is the transformation of homosexuality into a secret: it is not spoken about openly, and it is not immediately visible; thus it becomes a "problem" that can be kept to oneself, debated inwardly and defended from public gaze (*Ibid.*: 144). Secrecy leads to solitude; and the closet homosexual may come to privatize his/her life to the point of utter social isolation.

Jery Wine, writing about lesbian academics in Canada, has this to say:

"Some of us have spent time attempting to protect ourselves by keeping separate our private lives and our public academic lives, in order to keep our lesbian identities secret. We are all aware of the immense personal toll taken by the secretiveness and deception involved in leading a closeted existence. The woman among us who is most nearly closeted in her academic position described her precarious existence as 'one foot in the closet, the other on a banana peel..."

"I feel that the more people are secretive, the more you seal your own self into those box cars for them to take you away." (The Lesbian Issue, RFR, Vol. XII, No. 1, March, 1983: 10.)

Eventually, however, social isolation may become unbearable, and the homosexual may begin

to seek out contacts with fellow minority members, for companionship and solace. ²

Access to other homosexuals is clearly impeded by the veil of secrecy surrounding "the closet"; thus the homosexual in search of companionship may gravitate or be drawn towards the known "gay/lesbian ghettoes" in urban North America.

In order to cope with the psychologically devastating ramifications of their stigmata, homosexuals typically turn to sympathetic insiders, others who share the stigma, for support. By offering continuing peer support, friendship networks and self-help groups can provide homosexuals with a firm beginning for the development of a positive minority identity. By bolstering self-confidence and self-worth at a collective level, they can also provide an important first step in the long, and difficult process of "coming out".

Research studies on lesbian identity (Moses, 1978; Ponse, 1978) indicate that once a woman identifies herself as a lesbian, she becomes increasingly conscious of the fact that she belongs to a stigmatized minority towards whom society as a whole still holds predominantly negative attitudes. Consequently, she begins to spend her time among others who are similarly stigmatized. She begins to go to lesbian bars and enters an after-five world in which heterosexual women and men are excluded. The lesbian audience before whom the "straight" (heterosexual) mask is dropped, assumes great importance for the hidden lesbian. Due to fear of stigma she wears a mask and engages in "passing" in the presence of straights but among other lesbians she seeks relief from the pressures of subterfuge and also finds a sense of positive identity. As the lesbian private world becomes the real world for her selfexpression, the lesbian woman may cease to identify with women in the straight world.

Findings of a research study on lesbian women conducted by Moses (op. cit.) indicate that the closet syndrome arises in response to the difficulties which face lesbians in a society assumed to be heterosexual. Respondents pointed out, for example, that they found it difficult to be in the company of straight men because of the fear that they might be considered to be available as sexual partners. Accordingly, some lesbians were found to avoid heterosexual bars, clubs and parties, unless accompanied by straight friends who were aware of their lesbian identity.

Through the strategy of "passing", the lesbian woman conceals her real (homosexual) self when among heterosexuals. Thus, her need to express her real self leads her to other lesbians and serves to strengthen the bond of secrecy among closeted lesbian women within the private, lesbian subculture.

Leading a Double Life: The Chimera of Passing

In those cases where the strategy of "passing" as heterosexual in public life presents itself as a viable option to closeted homosexuals the "double life" syndrome may emerge. The homosexual may compartmentalize his/her social existence into two distinct life-spheres i.e., private and public roles. Insofar as one's private role is carefully kept secret (closeted) the homosexual may live in constant fear of public exposure. The public role, accordingly, may be a fragile facade, which rests on a host of deceptive mechanisms designed to guard the secret private life from public view.

Ponse (op. cit.) points out that for the secretive lesbian, "passing" refers to the successful accomplishment of presenting a virtual "straight" (heterosexual) identity when among (assumed) heterosexual persons. Because majority society is predicated on the (erroneous) assumption that everyone, unless demonstrated to be otherwise, is heterosexual, the self-acknowledged lesbian must develop a heightened consciousness of identity management in order to pass as a straight woman in everyday, public life. The strategy of passing involves the construction of a "straight front", a heterosexual mask, in terms of details of dress, speech, affect and demeanour. The straight front necessitates the use of both verbal and non-verbal identity-cues. Non-verbal cues include dress management designed to give the "expected" appearance of feminity. Because the stereotypical lesbian is (erroneously) assumed to be masculine and to dress in "manly" attire, the secret lesbian must consciously construct an overtly feminine front in order to pass as a straight woman. Verbal cues may be covert or overt. Overt cues may include the deliberate reference to a "boyfriend" in conversations with heterosexuals and/or the accompaniment in the event of social occasions, by a male friend, in order to give the appearance of a heterosexual "couple". Covert cues may involve remaining indifferent to a derogatory statement about homosexuals or laughing at a joke about "queers" or "dykes".

In short, for the lesbian woman who wishes to conceal her true homosexual identity for fear of being stigmatized as "butch woman" or "dyke", she must engage in a constant process of identity management or passing which involves constructing and maintaining a straight front (*Ibid.*).

Insofar as the lesbian minority member dichotomizes her private and public worlds along lines of gay and straight, she lives a "double life". While the double life syndrome minimizes the risk of being socially ostracized or rejected, it can lead to a "Catch

22" situation: the lesbian closet, initially constructed to provide an antidote to social isolation and personal alienation may lead to a state of cognitive dissonance and increasing alienation from straight friends.

Ponse (*Ibid.*) found that most lesbian respondents did not want to isolate themselves from their straight friends. Accordingly, they felt compelled to choose between disclosure and concealment with respect to their lesbian identity. Either choice was tensionproducing. To disclose her lesbian identity involved the risk of rejection; to conceal it by deliberate deception involved the tensions of identity management in "passing". The solution adopted by many lesbian minority members was to keep their gay and straight lives separate (the double life syndrome). But leading a double life means living in constant fear of exposure and may, in itself, lead to a sense of alienation. One of the consequences articulated by lesbian respondents in Ponse's study was the lack of reciprocal sharing of personal intimacies among heterosexual women friends. When straight friends would discuss their love affairs, lesbian respondents felt constrained to say nothing, to neither lie nor to disclose lesbian relationships. Yet, their need to share their own (same gender) loving experiences remained. This inability to share personal feelings and experiences with heterosexual women friends generated a sense of isolation and feelings of meaninglessness and alienation in lesbian respondents in their interactions with straight women friends. Such feelings were not diffused by the "double life" strategy because lesbian respondents did not give up their straight friends.

Over time, leading a double life can become psychologically intolerable; accordingly, the minority member may be propelled out of the closet, at least situationally, in order to find new coping mechanisms. S/he may seek professional guidance through psychiatric, psychological and/or spiritual counselling; or s/he may "come out" of the closet to varying degrees and may begin to lead an open life in more and more social contexts through disclosures to others of his/her stigmatized minority status.

When questioned about his past, double-life existence, a prominent gay leader had this to say:

Basically, I lived in anguish, and lived a dual role. I would occasionally have these [homosexual] experiences. I felt extremely guilty about it. I still continued to date women and to lead a very heterosexual social life... I spent several years in psychoanalysis, trying [unsuccessfully] to become heterosexual... then I moved to New York City and [here] it was easy to develop a gay niche of social activity. I continued a heterosexual facade when it came to my business life... however, there was great ambivalence in having this heterosexual identity at business and having gay identity elsewhere... [At work] I was always cryptic

over the phone to gay friends and generally would discourage calls at work from gay friends... I had to pretend I had a girlfriend... I would always play the role with clients... I would have a girl on my arm for these social occasions... I was even engaged to be married, three times... (Excerpted from personal interview with Gay Leader from N.Y.C.)

The respondent quoted above spent over eight years in psychoanalysis, years of personal anxiety, frustration and self-denigration because of his continuing failure to become "straight". Finally, he came to accept his homosexuality as a "natural" human condition and emerged from the closet to become a prominent leader of the Gay Rights Movement in the United States.

But for members of stigmatized minorities, the process of "coming out" can be a long and painful experience, for with each disclosure to others of the stigmatizing condition the risk of rejection resurfaces. Not surprisingly, then, current estimates suggest that more than 90% (ninety percent) of homosexuals remain in the closet (personal communication, 1986). ³

The Culture of Stigma The Culture of Liberation

Whether closeted homosexuals attempt to "pass" in heterosexual society, in their private lives many tend to seek personal relationships among other homosexuals. In so doing, they may become involved, in varying degrees, in the activities of a wide variety of minority sub-cultural institutions serving the needs of the homosexual community.

In the large urban areas of North America, the homosexual sub-culture has attained a high degree of institutional completeness. For example: a feature article in the *Toronto Star* (January 7, 1979) described the "world of Metro [Toronto's] 200,000 homosexuals" as follows:

There is a gay baseball league, a gay synagogue, and a gay archivist in Toronto. There are gay grandmothers, gay youth clubs...

There is the Ontario Gay Teacher's Caucus, and a gay union for college professors. There is a gay travel agency and a gay real estate company.

There is a gay business council and a gay newspaper.

There is a gay church, and two gay bowling teams. Both the Anglicans and the Catholics have gay organizations. Osgoode Hall law school has a gay group.

There is a gay book store and a club called Parents of Gays.

There are gays who cruise the bars, picking up Yonge St. strays for one-night stands. There are gays who have illegal sex in public washrooms, or anonymous encounters in bath houses.

But there are also gays who live quietly in suburban split-level houses or high-rise apartments and who never make the scene downtown [the "gay ghetto"].

And while some gays fight loudly for gay liberation, others live in fear in Mississauga praying that their wives and kids won't find out about their hidden lives.

... There is a huge homosexual community in Toronto made up of people whose goals, attitudes, morals and lifestyles are as diverse as those found in heterosexual society.

For deeply-closeted minority members, the hidden sub-cultural life itself may be ridden with shame and guilt:

Many [homosexual] people feel driven to these underground places... washrooms, parks, etc. This is their secret life. A high percentage, and this has been statistically noted, are married men with a double secret. They have to bury their true sexuality... (George Hislop, quoted in Foster and Murray, 1972: 227).

Yet, for many other minority members whose public and private lives remain compartmentalized, the pains of "passing" may be compensated for, at least in part, by the genuinely experienced satisfactions obtained through participation in the alternate, sub-cultural activities and by the adoption of one of the alternate lifestyles found within the minority milieu.

Karla Jay writes of the lesbian bar as one of the key institutions of the lesbian sub-culture:

It is probable that the first bars began operating at the end of the 19th century, a time when lesbianism itself (and homosexuality in general) was emerging as a lifestyle, not merely a sexual act... [Today] there are bars, bars everywhere... the lesbian bar is a world within our world replete with its own cast of characters, governed by its own rules, maintaining it own rites and rituals, and even comprising its own special geography. I remember once being given a tour of a bar and shown exactly where to stand if I were part of a couple or looking for some action and also the pose I should take if I were butch or femme. (RFR, Vol. XII, No. 1, March 1983: 18.)

Although not organized as support groups, bars can function as support systems for lesbians. According to Abbot and Love "... sanctuary has customarily been offered by the church, but for the lesbian, sanctuary often is found in the anonymity of the urban night..." (1972: 69).

Besides the various minority institutions designed to accommodate distinctive, homosexual lifestyles, the minority sub-culture includes also a number of self-help groups and minority rights-oriented groups designed to facilitate the creation of positive, minority identities and to promote minority cultural liberation.

According to Ponse (1978: 92) minority support groups in the lesbian world are important in

neutralizing and overcoming the stigmatizing effects of the negative judgements of the heterosexual world. Ponse distinguishes between two types of minority support groups: secretive groups and activist groups.

Secretive groups provide an opportunity for lesbians to socialize with each other in an atmosphere where closeted gay women can relax and possibly develop relationships with other gay women. Women joining the group must usually be acknowledged as being gay by personal knowledge of existing members, or by passing an interview. Secretive groups often emphasize the need for gays to accommodate to their minority status, not to change the status. These groups stress the need for gays to harmonize with the "straight" world, and they emphasize the similarities between the two worlds. Lesbianism is seen as a sexual preference only rather than as a distinct sexual orientation expressed in an alternative lifestyle. While secretive groups often do not directly address lesbian identity as an issue, they must make sure members identify themselves as lesbian in order to ensure and protect the secret status of the group. Occasionally, bisexual women or sympathetic heterosexual women (in Goffman's parlance, the "wise") may be admitted to the group by virtue to their trustworthiness (Ibid.: 90).

Activist groups, committed to gay liberation and/or feminism reject the minority status of lesbians by challenging heterosexism. Changing the lesbian identity to a positive identity choice is the primary issue. Activist groups help women coming to terms with their lesbianism by starting with the assumption that being a lesbian is a natural alternative lifestyle. Most gay women in the initial stages of coming out tend to have a negative view of their gayness. Activist groups therefore make a concerted attempt to instill feelings of lesbian pride. They use proud, "open" gays as role models, and they discuss sensitive identity and lifestyle issues in a supportive environment.

Activist groups may accept bisexual women, but they tend to regard bisexuality only as a preliminary stage in the process of coming out. Accordingly, they try to influence women towards acceptance of their lesbianism by pressuring them to conform to the identity norms of the minority subculture (*Ibid.*: 91). While activist groups encourage their members to come out and to proudly label themselves as lesbians, they will protect the identity of their members wishing to remain secret (*Ibid.*).

Minority support groups, whether secretive or activist, can play a vital role in the long and difficult process of coming out by providing a supportive context of similarly stigmatized others to whom disclosures about minority identity can be made without fear of hostile societal reactions.

Phase Two: Coming out

"To come out [of the closet]... means bucking the most basic and deep-seated norms of a society..." (Altman, op. cit.: 8.)

Insofar as the homosexual sub-culture is the indirect product of highly negative societal reaction, i.e., majority labeling and stigmatization, the neophyte, warily emerging from the closet, is highly conscious of the fact that in adopting an alternate, homosexual lifestyle, s/he is repudiating deeplyingrained and cherished heterosexual norms. It is far from surprising, therefore, that the initial phase of coming out is one which typically is fraught with tension and fear. The neophyte's choice among the various lifestyle options to be pursued will generally reflect the extent to which s/he is prepared to come out openly. At the present time, says Altman, there are very few homosexuals who do not feel the need, at least in part, to live a double life. For all the evidence suggests that a majority of those who identify as homosexuals fear disclosure (*Ibid.*: 29).

In a recent (1982) doctoral dissertation, Eisner developed a model of the coming out process, based on personal interviews with a Canadian-based sample of lesbian-identified, homosexual women. In this model, the process of coming out is divided into four (interrelated) steps: 1) recognition and development of a positive homosexual identity; 2) contact with homosexual community; 3) interpersonal events; and 4) self-disclosure.

In Eisner's scheme (1982, Table 20) the sequence of voluntary self-disclosures (in Step Four) begins with lover, and moves through therapist, minority (gay) community, close heterosexual friends, (some) siblings and peers among relatives, other relatives, parents and employer, until the final stage of public disclosure. It should be noted, here, that at any point along this process, others may find out the secret without being told by the minority member.

In some respects, this scheme reflects problems peculiar to the homosexual minority. Altman argues, for example, that it is in relationships with one's family that the peculiar nature of the stigma of homosexuality cuts most deeply (op. cit.: 28). Unlike those stigmatized by colour or caste, Altman contends, one's homosexual stigma is not shared by one's family, and unlike the case of physical disabilities, the nagging suspicion remains that one could rid oneself of it, if one wanted to. These unsubstantiated majority assumptions create an "insoluble dilemma" for homosexual persons: if their homosexuality is disclosed to parents, they risk anger and pain (if not total rejection) and yet, if they hide it (keep it in the closet) they risk becoming alienated from their families, drifting apart, and

avoiding any contact that might uncover their core, homosexual identities. Insofar as homosexual partnerships do not in themselves create families, the estrangement of homosexual persons from their families of origin can be psychologically devastating; thus they tend to keep the secret from families and especially from parents, even longer than it is kept from others.

Valverde (RFR, op. cit.: 66) suggests that the degree to which individual lesbians come out is, to some extent, a function of privilege. The "rich and famous" can come out with relative impunity, and, in such cases, even individual acts can have an important public impact; the ordinary office-worker, on the other hand, is far more likely to jeopardize her position, without generating much political impact by her act of courage.

Another factor affecting the rate and degree to which lesbians come out, says Valverde (*Ibid.*), is that of coming out *together* with friends. By way of example, Valverde points to her own personal experience; she claims that she came out relatively quickly, not so much because of her own courage, but because of the solicitous support of her lover and friends who came out with her.

There also are various support systems designed to help lesbians and gay men during the different stages of the coming out process. As documented earlier, some support groups emphasize openess (coming out to the public) while others remain closeted (secretive). In the processes of destigmatization of homosexual identity and coming out of the closet, anonymous, secretive self-help groups can play an important role in affording much-needed support to fear-filled minority members. However, in order for destigmatization at the group level to eventuate, more and more minority members must come out to the public, and minority organizations must come to assume open, activist, human rights mandates.

Phase Three: From Secretism to Activism

The transformation from a closeted organization to an open, activist group necessitates, at the outset, the shift from a negative, stigmatized, collective identity to a positive, proud sense of minority identity on the part of members. At the initial stage of activist organization, group members must come to reject the stigmatizing labels which symbolize their degradation and they must replace them with positive terms of reference, carefully chosen by minority members themselves: from "queer" to "gay"; from "dyke" to "lesbian". Group members also may create new group symbols (diacritica) expressed in logos, emblems, flags and the like which

can reinforce a revitalized and proud minority identity. As visible indicators of group identification, symbols can become the rallying points for repeated occasions of collective mobilization and group affirmation.

Symbols typically are drawn from a stigmatized minority's distinctive group history, a history which is likely to include continuing experiences of personal and group degradation and harassment at the hands of majority authorities. Like many other stigmatized populations, the Gay/Lesbian minority has a group history marked by persecution. Indeed, Gay men and Lesbians have been singled out as targets for the most extreme, collective form of human rights violation, namely, genocide. Just as Jews, market for extermination under Hitler's Nazi regime in World War II Germany, where compelled to wear the Yellow Star of David, symbol of their stigmatized ethnicity, so Gays and Lesbians were compelled to wear the Pink Triangle, symbol of their stigmatized sexual orientation. For Gays and Lesbians, as for Jews, the symbols of their collective defamation and persecution have become hallowed emblems central to minority members' self-identification with their group history. Like the Jewish Star of David, the Pink Triangle is worn openly, displayed in parades and marches and commemorated in collective ceremonies.

A news report (Go Info: March, 1983) on "Pink Triangle Week" in Ottawa reveals the symbolic importance of this emblem for the contemporary Gay/Lesbian community in Canada:

"Pink Triangle Week — A Gay Community Appeal"

The first gay community appeal in Ottawa was held during Pink Triangle Week, February 11 to 19 [1983]. The Pink Triangle is the symbol which lesbians and gay men

were forced to wear in the Nazi concentration camps. Gay people worldwide have adopted this symbol as a reminder of antigay oppression and as a symbol of the determination of gay people to live full lives in spite of the oppression. Gays of Ottawa (GO) organized the community appeal as part of its campaign to raise funds for its community and social services.

The positive affirmation of the collective identities of gay men and lesbian women are symbolized in current organizational logos, which have been adapted from traditional anthropological/biological emblems for sexual identification, as shown in the diagram below:

DIAGRAM II

Sexual Status

Sexual Orientation

male

o' (straight man)

ರೆರೆ (gav man)

female

♀ (straight women) ♀♀ (gay/lesbian woman)

** (8

Minority Group Symbol (Gay/Lesbian Community) ೪೪♂♂

From their status as minority members, despised and persecuted because of majority-created horror stories about their sexual orientation, we may diagram the development of positive group redefinition and affirmation among Gays and Lesbians, in two "Acts," as follows:

DIAGRAM III

Act One

Majority label

(focus on acts, behaviours)

Queen	
"Faggot"	

unnatural (biological) sinful (religious)

"Dyke"

immoral (moral/legal)

"homosexual" (sick [medical/psychiatric])

"homosexual"

(socially/sexually deviant

[sociological])

Act Two

Minority Re-definition

(focus on natural human predisposition)

homosexual (Benkert)

(natural, biological alternative)

"gay" and "lesbian"

(legitimate alternate lifestyles and identities, based on "sexual orientation")*

based on sexual orientation

* [natural, sexual and affectional preference]

From Faggot to Gay/From Dyke to Lesbian

Over the last two decades, all of the prevailing, heterosexist labels of homosexuality (unnatural, perverse, sin, crime, sickness, social aberration) which, despite their differences, all assumed that it was a condition less preferable to heterosexuality—came to be challenged by homosexuals themselves (Altman, op. cit.: 6). Two quite new and related conceptions of homosexuality were put forward by minority spokespersons in the 1970's; the concept of the alternative lifestyle and that of a gay people or minority.

Altman (*Ibid.*) points out that the increasing adoption by homosexuals of the concepts of lifestyle and minority reveals a fundamental reappraisal of the meaning of homosexuality and a tendency to see it as a legitimate social and cultural phenomenon rather than a bio-psycho-social aberration.

Over the last decade, homosexual organizations have put forth enormous efforts to shift the minority definition further, from behaviour to identity. The prime symbol of this shift lies in the replacement of the majority-contaminated term, homosexual, by the positive self-designation as Gay men and women.

Positive affirmation of group identity as Gays also is symbolized in the in-group re-definition of gayness and sexual and affectional preference. This definition departs radically from previous majorityimposed labels, firstly, in that it refers only to one's sexual orientation, or predisposition, not to sexual acts or behaviours. Secondly, this definition provides a legitimate alternative to heterosexual "love" for it includes affectional as well as sexual preference. What is implied in this definition is that it is "natural" for persons whose sexual and affectional preference is for members of their own sex, to pursue a legitimate lifestyle as gays; just as it is "natural" for persons whose sexual and affectional preference is for members of the opposite sex to pursue a legitimate lifestyle as "straights" (heterosexuals). In both cases, gay and straight, one's natural "orientation" would lead one to pursue and to form sexual and affectional relationships with partners of the same (gay or straight) sexual orientation. Hence, neither orientation can be seen to pose any kind of "threat" to the other.

While this definition of "gayness" has become generally acceptable to both gay men and gay women, the label "Gay", which generally connotes male homosexuals, in itself is seen as problematic by increasing numbers of gay women. Accordingly more and more organizations of gay women are currently adopting the self-designation, *Lesbians*. The latter term of reference not only distinguishes female from male members of the gay minority, but also, it

symbolizes the double minority status of lesbians — as gays and as women.

Act Three:

The Gay and Lesbian Liberation Movement

A number of minority spokespersons, reflecting on the development of the Gay and Lesbian Liberation movement in the United States and in Canada, divide the movement into stages, each (roughly) representing and occurring within a particular decade or decades following World War II (Altman, op. cit.: Jackson, Persky, et al. 1982). In the 1950's, and throughout most of the 1960's the "homophile" movement remained, for the most part, in the closet. A major constraint operating against open gayness, both in Canada and in the USA, was that imposed by legal discrimination (Criminal Code prohibitions).

The year 1969 is seen today as a watershed year for the Gay/Lesbian Liberation Movement both in Canada and in the USA. South of the border, in New York City, street demonstrations (referred to by media commentators as "riots"), took place at the Stonewall Inn, a Gay Bar in Greenwich Village. Here, for the first time, gay customers fought back during a police raid. In the USA, this event is taken to mark the symbolic beginning of contemporary Gay Liberation.

In Canada, amendments to the Criminal Code came into effect in 1969, legalizing sexual acts between two consenting adults (over the age of 21), in private. While the word "homosexual" does not appear in the amendment, homosexuals and others soon began to deem the document the "homosexual bill", for it clearly opened the door out of the closet for Canada's "adult" homosexual population. After the Criminal Code was changed, homophile organizations sprang up across Canada and their membership grew rapidly (Foster and Murray, 1972: 29). The Body Politic, a national gay newspaper, which has since been in the forefront of the Gay Liberation Movement in Canada, was published for the first time in 1971.

The 1970's will probably go down in history as the Human Rights decade in Canada and in the U.S.A. Within this human rights-oriented societal context, the name of the homosexual movement and of its many and varied organizations shifted perceptibly from Homophile to Gay and Lesbian. This change in nomenclature clearly symbolized the "coming out" of the movement through its open affirmation of homosexuality and of gay and lesbian rights. Within the movement, there developed an increasing number of political action groups — Gay and Lesbian caucuses and Lesbian and Gay Rights

lobbying groups which sought to persuade politicians and governments to amend and/or to create legislation which would recognize and protect the fundamental human rights of gays and lesbians.

By the end of 1970's, however, the backlash of the "moral majority" against the new visibility of lesbians and gay men had begun to take serious hold. Sparked by the highly propagantized anti-gay and lesbian campaigns of "Born-again Christian" Anita Bryant, and like-minded others, attacks on minority members in the known gay and lesbian "ghettoes" became more frequent and police harassment in these areas was stepped up (Jackson and Persky, op. cit.: 225).

More recently, majority backlash has escalated to the point of virulent homophobia as a result of rampant rumours about the "Gay Plague". Bombarded with lurid media reports, public attention has become riveted upon the "spread" in the U.S.A. (and, to a lesser extent, in Canada) of the seemingly fatal disease, A.I.D.S. (Acquired Immune Deficiency Syndrome — AIDS). Male homosexuals (together with Haitians, hemophiliacs and intravenous drug abusers such as heroin addicts), have been identified as high-risk populations. ⁴ As the disease is thought to be transmitted through the blood, these populations have been asked not to give blood for transfusions.

The highly speculative and equally highly sensational media coverage of this little known disease, has directed public attention toward male homosexuals as a "dangerous" and publically threatening minority, and has vastly heightened the salience of their stigmata. Fear of "contagion" through ordinary contact, while as yet unwarranted by any evidence, has become rampant. On the one hand, some health workers reportedly are refusing to treat AIDS patients; and on the other hand news reports from the United States indicate that the "moral majority" is claiming that God is finally punishing the entire homosexual population for its sins, by inflicting its members with the deadly disease (Globe and Mail: July 7, 1983; Time: April 4, 1983).

The result of this majority backlash has been an increased gay and lesbian resistance; and this, in turn, has served to solidify the minority community. It has fortified minority members' determination to defend the collectivity against the corrosive effects of external discrimination.

As detailed earlier, in 1981, police in Metro Toronto organized and carried out a series of raids on gay baths in which private property was smashed, "found-ins" were charged and exposed to public ridicule and "keepers" were dragged through the courts under antiquated and rarely invoked "bawdy house" laws. This discriminatory attack upon gay

institutions and persons spawned the formation of the Right to Privacy Committee, a very active committee which continues to protest against outside interference with the Gay/Lesbian community's "social space" (Jackson and Persky, 1982).

Most recently discriminatory attacks upon the Gay/Lesbian collectivity, arising from relentless media reportage linking AIDS with the Gay population, has spawned a variety of educational and anti-discriminatory defence mechanisms within the target community. Gay/Lesbian organizations have raised funds for research into the sources of AIDS; they have developed public educational materials designed to refute the discriminatory assumption that AIDS is a "Gay plague" and they have been in the forefront of the movement to combat the fear of AIDS and to protect its victims (homosexual and heterosexual alike) from the dehumanizing effects of social ostracization and isolation (Body Politic, passim).

Recent events have given rise to a new dimension of Gay/Lesbian protest — protest against interference with the minority's social space and private, sub-cultural life. Attacks on Gay institutions (like bars, baths and discos) are now seen as attacks on the collective life of the community. As such, they have generated a new, collective response rooted in minority members' desire for recognition of the legitimacy of their distinctive gay and lesbian institutions and subculture.

Arguing for the legitimacy of alternate Gay lifestyles, Lee contends that the existence of the gay "ecosystem" does not in any way undermine heterosexual society; indeed, the existence of equivalent/alternate sexual and affectional lifestyles, whether adopted by homosexuals or heterosexuals, represents a legitimate, healthy expression of cultural diversity in Canadian society (Lee, 1978: 299-300). Today, this claim for sub-cultural legitimacy translates into demands for protection of the collective cultural rights of the gay and lesbian minority throughout Canada.

The latter goal of the gay and lesbian liberation movement sets a new course for the agenda of the 1980's. In Canada, the 1970's — the Human Rights decade — was a decade marked by extensive lobbying efforts by gay and lesbian organizations to have "sexual orientation" listed among the specified non-discriminatory grounds in human rights legislation throughout the country. With the single exception of the Quebec Charter, 5 this effort was unsuccessful. Even more importantly, despite considerable support from civil libertarian and other majority sympathizers, gay and lesbian lobbying efforts failed again to have "sexual orientation" specified (under equality rights) during the negotiations leading to the

formulation of the provisions of the Charter of Rights and Freedoms in Canada's amended Constitution (1982).

The Gay and Lesbian liberation movement in Canada today continues its struggle for legislative change which would protect the fundamental, individual, human rights of minority members throughout the country. At the same time, more and more "open" Gays are coming to embrace the minority collectivity as a living community whose members have developed the requisite institutional framework for the maintenance of their distinctive sub-culture and who now are seeking public legitimation for the minority community and for its alternate sub-culture. Thus, Gay Liberationists in Canada are broadening their human rights mandate and are seeking societal-wide recognition and legitimation both as individual citizens with fundamental human rights, and as a minority collectivity with collective, cultural rights.

In the words of one Canadian researcher: "One result of the gay liberation movement is that homosexuality as a way of life is now held up as a viable alternative for those whose sexual orientation is biased in that direction" (CHRC, 1979: 46, author's emphasis).

NOTES

- 1. A fuller discussion of the dynamics of minority ethnic protest is found in Kallen (1982: 186-192).
- 2. Insofar as homosexual orientation, by definition, comprises both a *sexual* and an *affectional* preference for members of one's own gender, such contacts *may* or *may not* involve explicitly sexual activities.
- 3. Personal communication with members of the Gay/Lesbian community in Toronto and in New York City suggests strongly that, at the time of writing (1986), the "coming out" trend among homosexuals may be undergoing a process of reversal in response to homophobic media coverage of the spread of AIDS. Fear of being associated with the dreaded, seemingly fatal disease, has propelled increasing numbers of gay men (at least temporarily) into a new kind of closet and a new kind of gay lifestyle (single partner/safe sex).
- 4. These four populations have come to share a common stigma denoted by the not-so-funny term, the "Four H club."
- 5. In Quebec, the alleged catalyst for the break-through amendment including "sexual orientation" in the provincial Charter of Rights was the threat of violence posed by gay/lesbian militancy, and the trigger to this threat posed by a spontaneous, illegal demonstration in reaction against police incursion into homosexual meeting places (CHRC, 1979: 54).

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