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Article:

Baumgarten, N. and Bick, E. (2026) Danish and German folk perceptions of hate speech: popular usage and popular reasoning. *Contrastive Pragmatics*. ISSN: 2666-0385

<https://doi.org/10.1163/26660393-bja10172>

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Danish and German Folk Perceptions of *Hate Speech*: Popular Usage and Popular Reasoning

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Received 7 April 2025 | Accepted 16 June 2026 |

Published online 4 September 2026

Abstract

This article discusses usage-based conceptions of the term ‘hate speech’ in Danish and German to understand ‘folk’ perceptions of the expression in the two languages. The study is based on popular usage of the term on social media and metareflective discourse on hate speech in interviews with native speakers. The findings show that the English loan word ‘hate speech’ and its German and Danish loan translations are metapragmatically significant expressions which function as evaluative tokens for moral assessments of communicative behaviour as part of politicised discursive practice online. Notably, the interviewees do not reference these online practices, pointing to a gap between spontaneous linguistic performance and metacommunicative awareness. Comparison across the languages further reveals variation in the ideological-political discourses into which the hate speech token is recruited online as well as differences in the moral orientations underpinning the understanding of hate speech in popular reasoning.

Keywords

hate speech – Danish – German – folk perceptions – metapragmatic discourse – culture-specific descriptors of language use

1 Introduction

This article discusses usage-based conceptions of ‘hate speech’ in Danish and German to understand the ordinary, ‘1st order’ meaning and pragmatic value of the expression. It focuses on everyday understandings within two neighbouring linguacultures in which the term has gained currency as a loanword over the last decade – coinciding with regulatory and civic initiatives against increasing online aggression and hostility – and now exists alongside local loan translations (e.g., Danish ‘*hadtale*’, German ‘*Hassrede*’). The study uses two data sources: popular usage of the term in a large social media corpus and metareflective interview discourse on ‘hate speech’ with native speakers about their perceptions of online aggression.

We propose that the English loan word ‘hate speech’ in Danish and German, together with its loan translations, exists as a ‘metapragmatically significant expression’ (House and Kádár, 2021) in the two linguacultures: it functions as an evaluative token for metapragmatic assessments of communicative behaviour in the context of self- and other-positioning as part of doing politicised identity work online. In these contexts, the token ‘hate speech’ is used performatively for the discursive construction of political, national or ideological difference and disaffiliation. It is used to stigmatise as socially unacceptable and morally wrong, or valorise as justified, important or worthy the language use associated with the term. Indexing language use as hate speech symbolically demarcates cultural in- and outgroups and construes inter-group antagonism based on identity differences which are grounded in ideas of ‘rightful’ (morally, legally) forms of speaking/writing. The comparison of popular usage and metareflective discourse reveals that in both languages the performative metapragmatic usage of the term online as doing identity work is distinct from informants’ explicit reasoning about the phenomenon. Comparison across the languages indicates, however, that even between linguistically and culturally proximate societies, the conceptualisation and discursive deployment of the ‘hate speech’ token can be notably divergent and locally contingent.

This study complements the existing understanding of the term ‘hate speech’ used in linguistic research with an ordinary language user and usage-based understanding in Danish and German to add a participant perspective

which grounds the meaning of the term in time and space in ways that are relevant to members of the culture. Usage of and metareflective discourse on 'hate speech' by culture members provide context-based, emic accounts of a socio-pragmatically relevant form of communicative behaviour; a perspective that, arguably, has a role to play in broader societal discourses on the nature of the phenomenon, in the study of impoliteness (Culpeper, 2021) and variational metapragmatics (Haugh, 2018), as well as, crucially, Jaworski et al. (2004: 4)'s notion of metalinguistic 'sensitivity': people's capacity and tendency to notice, discuss, evaluate, and regulate language, which has arguably become a hallmark of social media discourse. More specifically, the analysis illustrates culture-specific ways of appropriation and re-semanticisation of terms through metapragmatic use online. The analysis provides insight into how 'hate speech' as a descriptor of communicative behaviour is contextualised in specific cultures; a question that is not often addressed in research.

Linguistic interest in online hate speech has grown alongside its recognition as a societal issue driven by attention-based communication models that reward polarisation (Kisic Merino and Kinvall, 2023). On this view, hate speech needs to be linguistically described to be combated through regulation and detection. Awareness raising and education, too, rely on criteria of what hate speech is and how people might recognise it. Consequently, most research responds to public concerns that hate speech undermines democratic discourse and threatens civil society (Jaki and Steiger, 2023), is a form of political violence (Wodak, 2021), and brutalises public debate to foster insecurity (Marx, 2018; Waldron, 2012). From these broad political concerns, research has typically followed a narrow lexical approach seeking to describe lexical and semantic characteristics of hate speech (e.g. pejorative lexis, dehumanising metaphors), often in corpus-based work and with a view to creating models for automatic detection. A smaller body of qualitative research has investigated pragmatic characteristics, sometimes with the aim to support regulatory frameworks (overview in Jaki, 2023; Sponholz, 2023; Marx, 2018). While these studies analyse language-specific data, they rarely address language or cultural specificity.

However, as has also been pointed out, hate speech does not have a particular linguistic structure but is evolving and context-dependent, making use of language-specific resources linked with local cultural contexts (e.g., Åkerlund, 2022; Jaki and Steiger, 2023). From this perspective, hate speech is the linguistic expression of evolving discriminatory tendencies present in any given society (Garland and Chakraborti, 2012; Marx, 2018), which, furthermore, may be evaluated differently in terms of their transgressive quality in different linguistic-cultural contexts. Across languages and cultures, different perceptions of hate

speech may exist, linked with context-specific experiences and narratives of contentious issues, both historical and current, and often related to perceptions of socio-economic and political insecurity (Garland and Chakraborti, 2012; Kinvall, 2018; Lewandowska-Tomaszczyk, 2020; Wodak, 2021). This opens up potential differences between linguistic concepts used in research informed by supranational policies¹ and what ordinary language users may take the term to mean. The question of meaning is arguably even more relevant in linguacultures where the term can be perceived as an obvious import from Anglophone cultures and in which neither a shared understanding of the English-language term nor broadly shared ideas about its relevance in the local cultural context can be taken for granted.

User understandings of the term vary even within Anglo-American contexts. Brown (2017a, b) provides an overview of the range of meanings available for 'hate speech' as a result of being used in connection with a diversity of phenomena in a range of social, political, cultural, and economic domains. He describes 'hate speech' as an "opaque idiom" that denotes a "family of meanings for which there is no one precise definition available" (Brown 2017b: 562): As such it can be used

- as a generic term of disapproval in the service of identity-based envy, hostility, conflict, mistrust and oppression;
- to refer to forms of speech that attack members of groups identified by protected characteristics;
- to refer to unacceptable speech in relation to members of groups identified by protected characteristics, based on ordinary peoples' moral values and principles;
- to refer to speech that can be used to bring about positive and negative emotional effects or cognitive states in the audience;
- to identify or flag forms of speech that society fears to be socially divisive or destructive to social cohesion.

All the above relate to hate speech as a metapragmatic label: a lexical expression that a community uses for coding a selected aspect of an instance of communication with a view to normatively structuring its understanding and experience (Hübler 2011: 120). However, despite the proliferation of the term 'hate speech' into Danish and German – where it features near-identical dictionary codification and parallel loan translations – the linguacultural specificity of user understandings of the term is not well understood. Table 1 shows

1 E.g. *The Code of Conduct on Countering Illegal Hate Speech Online+* (European Commission, 2025).

the hate speech-related vocabulary in Danish and German terms, with definitions taken from standard dictionaries. Included are the older terms ‘hetz’, ‘Hetze’ and ‘Volksverhetzung’. The latter two are stigmatised by association with German 20th century history and criminalisation and are referred to by language users in the data. The table illustrates the similarity of the lexical fields in the two languages. As will be shown, however, a dictionary perspective on hate speech obscures cross-cultural variation in user understandings, underscoring Haugh’s (2018) contention that the conceptual scope of metapragmatic expressions may differ across languages and cultures.

TABLE 1 ‘Hate speech’-related vocabulary in Danish and German

Danish (Den Danske Ordbog, 2025; Dansk Sprognævn, 2025)	German (DUDEN, 2025; DWDS, 2025)
<i>hate speech</i> : hateful, hostile speech against particular groups; <i>hadtale</i> <i>hadtale</i> : no definition <i>hetz</i> (n), <i>hetze</i> (v): spreading hate persecution of someone through public mockery, criticism etc.; strong, persistent criticism of something, often from many sides, derivation from German ‘Hetze’	<i>Hate speech</i> (n): <i>Hassrede</i> <i>Hassrede</i> (n): from English <i>hate speech</i> , hate = <i>Hass</i> and speech = <i>Rede</i> , [public] speech containing hate messages; manner of speaking or writing that disseminates hate <i>Hetze</i> (n), <i>hetzen</i> (v): derivation form Old High German ‘ <i>hassen</i> ’ (‘to hate’ and ‘to hunt’); since 19th century: incitement of hatred, dissatisfaction; vile propaganda, impertinent, hateful, defamatory, disparaging statements, and actions that arouse feelings of hatred, hostile moods and emotions towards someone or something <i>Volksverhetzung</i> (‘incitement of masses’) ^a

a ‘*Volksverhetzung*’ (‘incitement of masses’) is a criminal offense in the German Criminal Code (section 130). It refers to incitement of hatred against groups. Section 130 makes explicit reference to the “rule of National Socialism” and “National Socialist tyranny”.

The following section summarises conceptualisations of hate speech in recent usage-based discursive linguistic research. Drawing on models from politeness research and folk linguistics, Section 3 presents the metadiscursive analytical framework and describes the analytical procedure. Section 4

discusses shared and contrasting aspects of popular hate speech conceptualisations in Danish and German based on the interview and corpus data, followed by the conclusion in Section 5.

2 Linguistic Conceptualisations of Hate Speech

Linguistic discourse analysis approaches view hate speech as a linguistic expression of power and violence used to target, minimise, and exclude groups (Marx, 2018; Baider, 2020). Some of this work has noted the pragmatic functionalisation of the term ‘hate speech’ itself through strategic “accusations”, “condemnations”, and “counterchallenges” recruited into antagonistic discourse to deepen social division and entrench disagreement (Boroszima-Habashi, 2015). Online, the term serves as a discursive object for parallel discourses on societal goods and moral rectitude: Marx (2018) shows users defending their expressions against being labelled “hate speech” by claiming discrimination or reframing their remarks as “rational”, “criticism”, “freedom of speech”, or the “normal form of argumentation online”. Marx also notes a generally unspecific usage that does not distinguish ‘hate speech’ from similar expressions such as “hate comments” or other language actions, such as “insults”. Similar to this discursive-performative function of the term ‘hate speech’, which strategically denies any fixed meaning of the term, Vilar-Lluch (2023) identifies a misalignment between ordinary understandings and the UK legal definition. This manifests as a “hate metonymy,” where the lexeme ‘hate’ is available in British English for collocations that discursively assess performances, behaviours and social actors by associating them with discourses on hate speech (e.g. “hate preacher”).

The existing research suggests that the use of the term in antagonistic interaction is a vehicle for – often politically motivated – strategic displays of the superiority of the moral value system that participants wish to project (Boroszima-Habashi 2015). The performative practices around the term ‘hate speech’, its seemingly open boundaries with other expressions and speech acts (‘hate comments’, ‘insults’), as well as the discursive use of the lexeme ‘hate’ as an evaluator of people and actions in relation to hate speech point to its availability as a communicative resource for the performance of political and, thus, culture-specific, identities and discursive constructions of alternative moral systems and points of view on public goals. For discursive and performative uses of the term to be meaningful in context, ‘hate speech’ will become meaningful in local, culture and language-specific ways. However, linguacultural

specificity and cross-cultural variation in the use and understanding of the term have not yet been explored.

3 Methodology

3.1 *First Order Conceptualisations, Metapragmatic Discourse, and Moral Orders*

This analysis conceptualises ordinary language user perspectives as the ‘first order’ concept of ‘hate speech’, reflecting folk perceptions (Niedzielski and Preston 1999). The first order concept is to be distinguished from ‘second order’ conceptualisations, which represent scientific, theoretical, or legal definitions. Originally introduced by Watts (2003) in relation to politeness, this epistemological distinction separates academic-technical frameworks from lay/folk understandings. A first order concept of ‘hate speech’ refers to understandings shared by ordinary language users of the term, including other relevant terms in the language(s) they use. The first order concept further encompasses what constitutes salient behaviour in relation to ‘hate speech’. If ordinary language users disagree over what does or does not constitute ‘hate speech’, this is taken to reflect real-world social struggles over meaningful and consequential discursive practices. First order conceptualisations manifest as metapragmatic discourse in interaction wherein language users debate, police, and negotiate the boundaries of permissible language.

More recently, Kádár and Haugh (2013) extended the first/second order model by adding a ‘user/observer’ distinction. Within this model, language *users* provide insight into their understanding of social actions and linguistic behaviour through metapragmatic evaluations of behaviour and linguistic forms on the basis of being present in what Kádár and Haugh (2013) call “evaluative moments”: Evaluative moments are instances in which a language user makes a metapragmatic comment on the social action they are involved in (e.g. “disgusting hate speech by X”²) or the moral order with reference to which the metapragmatic comments are made (e.g. “some left-wing idiot will report us for hate speech”). By contrast, lay *observer* perspectives provide interpretations without direct participation in social action. Observers, thus, provide metapragmatic accounts that attempt to explain, rationalise, and generalise why something does or does not count as hate speech (e.g. “hate speech is not

2 All examples are taken from the social media corpus.

freedom of expression”) as well as providing motivations (e.g. “after all, we are human and have feelings and they also spill over into writing”). Metapragmatic accounts that are shared across members of social groups and networks represent folk-theoretic understandings. Both user and observer perspectives will be considered as contributing to first order conceptualisations.³

Metapragmatic accounts provide insight into language users’ ideas about normative conceptions of standards of behaviour in relation to language use and interaction in their social world. Metapragmatic assessments, thus, provide conceptualisations of persons, relationships and social structures which underpin the moral order relevant in a group. The moral order can be defined as taken-for-granted conventions and expectations of behaviour, which are assumed to be shared between communicative partners and, more broadly, within the socio-cultural group; they are understood by group members to be a group value. The moral order provides the frame of reference for evaluations of behaviour as ‘good’/‘bad’, ‘appropriate’/‘inappropriate’, ‘permissible’/‘prohibited’ (Kádár and Haugh, 2013; Spencer-Oatey & Kádár, 2016).

Metapragmatic assessments made in local, situated contexts index bigger discourses on norms of behaviour at group level, which, because they are tied to morality, are often couched in terms of common sense or rationality (Billig, 1988). Kádár and Haugh (2013) propose that those bigger social discourses emerge and evolve through metapragmatic commentary and persistent frames of interpretation applied in the rationalisation of behaviours by ordinary language users. In the process, the concepts invoked in metapragmatic commentary (such as ‘politeness’, ‘civility’, or ‘hate speech’) become objectified as cultural descriptors of language use (House and Kádár, 2021): they come to be viewed as stable, concrete, and observable features that speakers can orient to and actively invoke in interaction. Concepts that have acquired this linguacultural significance for a group become available as a discursive resource for identification practices. In a general sense, they serve to position self and other (individuals and groups) as lying within or outside the normative behavioural standard. More specifically, however, they contribute to the projection and attribution of cultural group identities that are positioned in opposition to each other. Metapragmatic uses of and reflections on the term ‘hate speech’ are ideological judgements in the pursuit of moral superiority based on a group-specific understanding of the moral order underlying

3 In Kádár and Haugh’s (2013) model ‘observer’ understandings are categorised as ‘second order’ conceptualisations.

communicative interaction. Negotiation, conflict, and contestation of definitions of ‘hate speech’ among language users indicate an ongoing struggle over morally right and wrong conceptualisations of their social world, membership in social groups, and normative ideas about communicative behaviour within and across groups.

To systematically capture these first order dynamics and user-observer perspectives, the analysis operationalises two complementary metadiscursive perspectives. Specifically, it pairs Niedzielski and Preston’s (1999) approach to folk linguistics researching communities’ own theory of linguistic repertoire and speech through folk accounts, i.e. peoples’ views of “what goes on in language, how people react to what goes on and what people say goes on according to people” (Hoenigswald, 1966 cited in Niedzielski and Preston 1999:2) and Brown’s (2017b) proposal to seek a unified understanding and definition of hate speech as a legal term and as an ordinary language term through “folk platitudes analysis” and “ordinary language analysis”. A folk platitudes analysis covers how ordinary language users generalise about the term ‘hate speech’ and the phenomenon it is supposed to refer to: it analyses explicit metalinguistic and metadiscursive reasoning from an observer perspective. An ordinary language analysis seeks to understand what ordinary language users do with the term ‘hate speech’: it analyses the situated and performative use of the term as a metapragmatic label that names and typifies language use in evaluations of communicative behaviours as part of direct participation in social action that seeks to impose an interpretive frame within which the language used becomes meaningful.

A key analytical advantage of pairing these frameworks is that neither requires the application of second order conceptual categories during the coding process, while both resonate closely with the metapragmatic and moral order frameworks discussed above. By bypassing abstract external frameworks, the analysis avoids the methodological limitations that can arise when predefined second order concepts are superimposed onto an investigation of first order understandings. By consciously avoiding the projection of second order concepts, the study mitigates the constraint of filtering user perspectives through academic lenses from the outset, ensuring that the search for and interpretation of first order understandings remains genuinely grounded in user perspectives.

Accordingly, the data analysis was guided by the following broad questions derived from Niedzielski and Preston (1999), with the aim to reveal linguaculturally specific discursive constructions of hate speech based on ordinary understanding, everyday experience and interactional practice: According to the language user,

- what is hate speech and how is it done? (What happens when it happens?)
- who does it to whom? (Who are perpetrators and targets?)
- what is it about? (What are the thematic associations and the embedding in bigger discourses?)
- why does it happen? (What are the states and processes that trigger or facilitate it?)
- how is it assessed? (What is the language user's appraisal of it?)

The questions represent loose *a priori* coding categories which plausibly reflect everyday understanding, lived experience and ordinary assumptions about the contextual dimensions of the phenomenon of hate speech. They were also deemed to be equally applicable to metapragmatic discourse in the interview and the social media data. The questions are purposefully kept broad but clearly delineated to provide a comprehensive focus in the first instance, while guarding against analysing the data into more specific conceptual categories at the outset. Thus, starting from the questions above descriptive and *in-vivo* coding⁴ (Saldaña, 2021; Charmaz, 2014) was used to categorise the organising principles behind usage and reflection.⁵ The analysis procedure was based on Kuckarzt and Rädiker's (2025) qualitative content analysis, which is a systematic method for the analysis of textual data by means of categories and which can be equally applied to interview and social media data. Within this approach, content is understood as being on a continuum ranging from manifest (explicit) to latent (requiring context-specific knowledge). Accordingly, coding in this approach is understood as requiring interpretation rather than solely identifying manifest content.

3.2 *Data*

The analysis was carried out on two sets of data: popular usage of the term 'hate speech' and related terms (Table 1) in a large-scale social media corpus and metareflective discourse in a small set of semi-structured interviews with Danish and German native speakers about experiences with and perceptions of online hate speech.⁶ The former provide ad-hoc, spontaneous usage-based

4 *In-vivo* codes are phrases in the words of the users and may already include 'folk' terms indicative of a particular (sub)culture (Saldaña, 2021).

5 Further development of categories and codes were carried out inductively as the analysis proceeded.

6 These are two pre-existing data sets compiled for linguistic research on the expression and perception of hate speech (Authori et al., 2019). The data reflect discourses on co-occurrent events, which include the European 'migration crisis' (from 2015/16), the first wave of coronavirus pandemic (2020), the institution of the German Network Enforcement Act ('anti-hate speech legislation', 2018), and the UN Strategy & Plan of Action on Hate Speech (2019).

conceptualisations of hate speech (user perspectives), the latter provide elicited metareflective accounts of language users' interpretations and understanding (observer perspectives).

36 semi-structured interviews (14 Danish; 22 German) were conducted through non-random convenience and snowball sampling in 2019/20 with the aim to collect language users' experiences with and perceptions of hate speech online. Despite not generating data representative of the larger population, utilising convenience and snowball sampling offered advantages. By leveraging existing social networks, data collection can build upon a level of immediate rapport and trust, which is crucial when interviewing individuals about sensitive concepts like 'hate speech'. Likewise, this environment maximised participant autonomy, encouraging unprompted, interviewee generated language and inviting far-ranging reflections and personal narratives. Lastly, a loosely connected group of native speakers may reveal the shared knowledge, platitudes and evaluative practices that they naturally orient to. While the results remain exclusively representative of the data as sampled, the interviewees' accounts are considered as individualised engagements with broader cultural and societal frameworks for understanding or thinking about 'hate speech'. Sampling began in the researchers' personal networks and, therefore, resulted in a bias towards interviewees with university degrees. This and other socio-demographic information was not considered in the present analysis. All interviewees were informed about the purpose of the study before participating. All were native speakers of Danish and German, respectively.

The questions elicited talk about interviewees' social media use, their understanding of hate speech, personal experiences with and attitudes towards hate speech and people who post hate speech, discussion of existing and need for regulation, and acceptability ratings of examples of hateful comments taken from the social media corpus.⁷ The interviews were not specifically collected for metapragmatic research but do contain metadiscursive accounts. To ensure that the data reflected genuine user perceptions, the interviewers did not prompt participants with specific terminology – except for 'hate speech' and its loan translations. All analysed expressions were entirely interviewee generated. This approach allowed interviewees to introduce and navigate the phenomenon using their own linguistic repertoire. Because participants were encouraged to address the questions as they saw fit, the resulting discourse varied naturally, with some offering highly focused commentary and others providing detailed reflections or narratives of personal experience.

7 The interview guide is in the Appendix. Interview length varied between 20 and 80 minutes (average 45 minutes).

The analysis of popular usage online was performed on lexically constrained data from a large social media corpus (Baumgarten et al., 2019; Bick, 2020, 2023a). The corpus is bilingual and contains German and Danish data from Twitter, collected on an ongoing basis between late 2017 and mid-2020. The corpus covers a large and balanced part of the daily tweets in both languages, amounting to over 3 billion words (compiled in six chronologically sequenced parts) for German and 225 million words for Danish. The corpus only contains public posts that were freely accessible on the internet at the time of harvesting. The entire corpus was preprocessed for orthographical variation, tokenised and annotated linguistically within the Constraint Grammar framework (Bick and Didriksen, 2015; Bick, 2023b). The parsers used, GerGram (visl.sdu.dk/de/) for German and DanGram (visl.sdu.dk/da/) for Danish, provide full morphosyntactic annotation such as POS, inflexion, compound analysis etc. as well as functional and structural information (dependency trees). In addition, the annotation contains a semantic layer, with semantic ontologies for the content word classes, named-entity recognition, framenet structures and semantic roles. Both parsers underwent genre-adaptation and also handled certain aspects specific to CMC data (computer-mediated communication), such as recognition and classification of emoticons/emojis and jargon abbreviations (e.g. 'lol', 'omg'). The analysis presented here was carried out using the CorpusEye (corp.hum.sdu.dk), a graphical corpus search interface that allows complex searches on all linguistic levels. CorpusEye supports an iterative quantitative-qualitative workflow by enabling users to re-enter concordance mode as well as the original thread from individual lexical elements.

For the analysis, all instances of the lexeme 'hate speech' and related terms in Danish ('hadtale', 'hadetale') and German ('Hassrede') were identified. Qualitative concordance line analysis and recontextualisation into the original tweet proceeded along the questions in Section 3 to guide coding and category formation for comparison across languages. To enable this qualitative analysis, due to the size of the German corpus, a lexical filter was applied that constrained the search to occurrences of 'hate speech' in the context of, broadly conceived, cultural in- and outgroups, which was particularly topical in public discourse at the time of data collection (regular expression: deutsch.*|einheimisch.*|kultur.*|Flüchtling|Ausländer|.*migrant|.*wanderer|Moslem|Muslim|Asyl.*|.*islam.*|Fundamentalist.*|Fremde.*|mensch.*). Then, to obtain a manageable yet systematically distributed dataset, 100 occurrences were randomly sampled for each search term from each of the six corpus parts. This stratified sampling procedure ensured that time periods were represented equally in the qualitative analysis, avoiding overrepresentation of periods containing larger numbers of occurrences.

All Danish and German data are presented exclusively in English translation due to space constraints and critical ethical considerations. For the social media corpus, translation breaks original text strings to prevent search engine indexing and protect user anonymity. In parallel, translating the small-sample interview data obfuscates participants' unique idiolects and localised speech habits, adding a layer of linguistic anonymisation without altering the conceptual substance.

4 Results

4.1 Interviews: *Popular Reasoning about Hate Speech*

No unified understanding of hate speech emerges from the Danish and German interviews, neither across the languages nor within. Interviewees were not particularly familiar with the term or the German and Danish loan translations. Nine (64%) of the Danish and eight (36%) of the German interviewees either did not know the term or had never actively used it. Interviewees used alternative terms, such as the Danish “*svine til*” (‘to speak disparagingly’) and German “*hetzen*”, and also named other forms of online aggression, often using English or Anglicised terms, such as “trolling”, “shitstorm”, “bullying”, “hate(r) comments” (German: ‘*Hasskommentare*’, ‘*Hater-Kommentare*’), and “fake news”.

Although there are overlapping conceptualisations held by Germans and Danes, only few are shared across a larger group of interviewees both within and across the linguacultural groups (Appendix, Tables A–C⁸). This indicates that ‘hate speech’ is what Brown (2017a) calls an opaque idiom that encompasses a multitude of features and that is thought of at different conceptual levels, including linguistic form, affective, cognitive and psychological states, as well as relational, interpersonal and socio-cultural perspectives. Meaning dimensions can also coagulate in an individual’s conceptualisation (underlined in (1)).

(1)

Gero4: Well, so that you, that it’s disrespectful, like that, really bullying, being contemptuous, Nazi stuff, AfD⁹ stuff. Things like that.

8 The tables include category frequencies. Although the analysis is not concerned with producing numerical generalisations, category frequencies are provided to indicate their prevalence in the data.

9 Extreme right-wing party *Alternative für Deutschland*.

In the following, the main characteristics of a shared understanding will be summarised, followed by a discussion of contrasting aspects of Danish and German conceptualisations.

4.1.1 Elements of a Shared Understanding of ‘Hate Speech’ in Danish and German

The shared understanding of hate speech covers a range of communicative phenomena and linguistic features, as well as – for a minority – the understanding that it is context-dependent and difficult to define. Most interviewees liken hate speech to a general notion of verbal abuse that takes the form of berating or speaking ill of someone; a majority also understands hate speech as having an underlying motivation, namely causing the other injury, distress or shame through denigrating and devaluing them. Generalisations about groups, negative stereotyping, and racist comments also fall under hate speech for both Danes and Germans. For many interviewees hate speech is realised by specific linguistic forms, in particular speech acts (“threats”, “insults”), and through specific lexical content (in particular, “swear words”). These broadly shared categorisations reflect an understanding of hate speech as intentional, linguistically explicit, denigrating verbal behaviour, directed at groups or perceived members of groups with identifiable characteristics. A parallel, less frequently mentioned understanding of hate speech characterises it as inherently elusive: it is dependent on word choice and as such can be indirect and subtle. It may also depend on individual perception, on who says it, or on one’s personal definition, which might differ from official definitions.¹⁰ A small number of interviewees consider hate speech as verbal behaviour related to emotions: some see it as an expression of when an individual experiences emotions of “hate” or “anger”; some suggest that there may be a moral difference between hate speech as a spontaneous emotional reaction and engaging in hate speech out of ideological conviction.

The typical perpetrators associated with hate speech include organised, ideologically driven actors, specifically right-wing political parties, including well-known protest and seditious movements. However, Danes and Germans associate hate speech predominantly with individuals who they locate on the margins of society, who are not fully part of the fabric of society: these are individuals who fall short of interviewees’ ideas of social standards and norms on a personal level. By far the most pervasive descriptors of a person who engages

10 The majority of interviewees did not know of any official definition.

in hate speech are “low educational attainment”, having “personal problems”, feeling “left behind” and being “disappointed by politics”, or leading unfulfilled lives (“bored”, “whose lives are empty”, “little self-esteem”, “in need of an identity”, “have too much time”). They are enabled by the affordances of social media and by polarised discourse about politicised issues in politics and the media.

The majority of interviewees assess hate speech as irrational (“madness”, “nonsense”) and anti-communicative but all the same related to notions of freedom of opinion and expression. Hate speech is seen as precluding dialogue, making no useful contribution to a discussion or the formation of public opinion (2). However, this is a matter of the user’s language choice (“language needs to be acceptable”) rather than content. A minority of Danes and Germans draw the line at causing the other mental or physical harm (3).

(2)

Ger10: “Hang the pigs” and “shoot them” and things like that, those are things that I find far removed from a normal culture of discussion.

(3)

Dan02: I think a lot feels like a threat and regardless of who it is on the other end, they shouldn’t go and fear for their lives or security or their whatever. So there must be a right to their views in a proper way, not that way.

A minority of interviewees attribute long-term negative societal and psychological effects to using and being exposed to hate speech (“division”, “insecurity”, “hate”, “radicalisation”, “disinhibition”).

4.1.2 Contrasting Aspects of Danish and German Conceptualisations of Hate Speech

Some differences between Danish and German understandings are notable. Danish interviewees appear to understand hate speech as a speaker-focused concept: it constitutes a particular manner of speaking and language choice labelled as “*grim*” (‘ugly’/‘nasty’) or “bad tone”, and an inappropriate positioning of the speaker towards the other (e.g. “being condescending”) (4). People who engage in hate speech are further characterised as socially unattractive (“sick”, “unpleasant”, “unintelligent”), and as not having been properly socialised in their families (5).

(4)

Dano6: well, so it can be both, people who use nasty words and call each other nasty things online, but also, it can also be a tone.

Dano2: Um, I think it's very, it doesn't even have to be extreme. It's maybe when people, I want to say talk down to or, yes, that kind of degradation in one way or another [...]

(5)

Dano6: Because I think it must be it must be some poor lives. Some sick people. Yes.

Dano5: Unpleasant [people] [...] and unconscious, can you call them that? Or unintelligent, like that. It's a lack of arguments, anyway

Dano3: [...] and [I] have seen good examples of extremely bad upbringing.

The Danish understanding further appears to be underpinned by a social norm of 'proper' (*ordentlig*) behaviour ("I think we must treat each other properly"), individual responsibility towards others, and norms of civility in communication, which pose constraints on language choice (6), and which extend into exercising self-constraint regarding one's right to freedom of expression: Freedom of opinion is not a 'duty' (*pligt*) to express one's opinion (7). In other words, the right to freedom of expression appears to include a moral obligation to choose to exercise self-constraint (8).

(6)

Dano2: you can have a proper discussion without talking nastily.

Dano8: of course you have the right to say what you think, but you can also do it properly.

(7)

Dan12: we have freedom of speech and you can't prevent someone via legislation, so that's the way it is, but, you don't have a duty to speak either.

(8)

Dano10: So I say you should be allowed to do that as a matter of principle, but there is no reason to necessarily enforce the principle just for the sake of doing so, nor is there any reason to call people all kinds of things just because you can. You can do that, but there is some kind of responsibility, some form of civility, some form of respect, which

is lost if you constantly go to the extremes of what you [can] do, which is involved in undermining ordinary civilised conversation.

A minority of Danes see hate speech as continuously adversely affecting these communicative norms, by eroding the very idea of self-constraint guiding people's language choice (9).

(9)

Dan13: And I know that DF [right-wing party] should not take credit for it all [...] but they have opened a gate that is very, very difficult to close again. And we just move further and further into the madness of how to speak.

Dan06: but I think that the boundaries are moving for how we can allow ourselves to talk to each other

Dan08: Yes, I think the limit is constantly being pushed for what you think is okay to say. Um, it's like we've become immune to some of those words [...]

By contrast, some Danes think that standards of communication online may evolve over time to reflect existing social norms (10).

(10)

Dan07: maybe the internet is also still in its infancy in the way that a standard has not been developed as much for how the forums should be [...]

The few categorisations that are almost exclusively mentioned by Germans suggest an understanding of hate speech as other-oriented: Hate speech is associated with Nazi topoi and incitement of hatred ("*hetzen*"), indicating the relevance of culture-specific historical memories and forms of verbal aggression associated with propagandistic othering and persecuting of groups (11); it is linked with being a public outlet for irate expressions of personal frustrations with others or disrespect of others ("*auskotzen*", "*pöbeln*"¹¹); and it is seen as personalised verbally aggressive, defamatory behaviour that goes beyond what one must tolerate (12).

11 The verbs include meanings of physical revulsion (vomiting) and being agitated.

(11)

Ger20: Um, and comparisons with the methods of the Nazis with regard to Muslims, that is quite extreme.

Ger21: I would say AfD disciples who rigorously incite hatred against foreigners. That's hate speech for me.

(12)

Ger02: I think if it doesn't exceed a certain level, of course, if it's below the belt and people are being defamed, then of course you can't have that, then it has no place here, but if it's more general blah blah then I think that's just part of our lives and these platforms.

German interviewees think that one must tolerate opinions, rather than judging or prohibiting them according to ideas of moral principles (13). However, schools and the education system are seen as responsible for getting young people to 'change their thinking' and educate them about social media use (14).

(13)

Ger12: I think you can, actually you must tolerate a lot.

Ger11: I sometimes think it is important that others also see that these opinions exist.

Ger17: just because we take a moral stance it doesn't mean it has to be the same for everyone else.

Ger05: [...] it's part of freedom of speech. Everyone has their own opinion and it's actually allowed to express them, and if you ban it then it will probably only get worse.

(14)

Ger 21: I'll put it this way, you may already get racist ideas from home and if you never question them or act upon them at school and you don't have a control body or a teacher who then deals with this and says "Guys, what you think is wrong."

Ger22: you start with it in school or kindergarten with education, quite simply. [...] The state could be involved, or held responsible. So I say, "Let's do two more school subjects within a week, where we talk about these things and deal with them practically."

4.2 *Popular Usage on Twitter*

Given the size of the corpus, the terms are not particularly frequent (Table 2), comparable to words like 'credit', 'rag' or 'colony'. By comparison, the older

terms Danish ‘*hetz*’ and German ‘*Hetze*’ are significantly more frequent, especially in the German data.

TABLE 2 Frequencies (relative frequencies as words-per-million)

Danish*		German		Sub-sample for qualitative analysis*
hate speech	448 (0.87 wpm)	hate speech	19905 (5.51 wpm)	525
hate-speech	43 (0.08 wpm)	(Hatespeech)		
hatespeech	230 (0.45 wpm)			
had(e)tale	1114 (2.17 wpm)	Hassrede	9313 (2.57)	497
hetz	6515 (12.67 wpm)	Hetze	162688 (45.07)	600

*Unique instances in sentential contexts, excluding retweets and hashtag-only posts

4.2.1 Metapragmatic Uses

Table 3 provides an overview of the contexts in which the lexeme ‘hate speech’ occurs in the corpus. In both languages, references to ‘hate speech’ are, without exception, part of politicised discursive practice.

TABLE 3 Categorisations of posts containing the lexemes ‘hate speech’, ‘*had(e)tale*’, ‘*Hassrede*’ (% of total)

	Danish	German
Hate speech accusation		
Minority target (with protected characteristics)	7.35	6.61
Right-wing target (parties, politicians)	25.12	16.84
Left-wing target (parties, politicians)	3.32	10.04*
Journalists and the media	–	8.85
Counter speech		
Counter-speech defending minorities with protected characteristics	9.95	1.72
Defensive right-wing counter-speech	18.72	5.61
Meta-level		
Laws, regulations, criminal code	12.56	2.97
Role of social media companies	23.22	5.09

TABLE 3 Categorisations of posts containing the lexemes (*cont.*)

	Danish	German
Defining and debating hate speech	8.53	38.04
Links to information about online hate speech (how to recognise and counter it)	–	4.23
	100	100

*Including ‘mainstream society’, ‘government’, anti-hate speech activists

On Danish Twitter, a large part of the posts are about playing the ‘blame game’, where the ‘hate speech’ label is assigned to groups or individuals (35.8%), eliciting counter-speech (28.7%). Part of these cases are reactions to specific tweets that users think are hate speech (or not), but many are general accusations of hate speech for the purpose of group boundary setting and classification of group practices: Thus, accusations target opponents on the political spectrum or other, culturally defined, groupings, mostly (25.1%), right-wing political parties or politicians (DanTW1a–b). 3.3% target left wing opponents (DanTW2) and 7.4% associate minorities (especially Islam) with hate speech (DanTW3).

- (DanTW1a) Well, there you admitted it. DF’s [right-wing party] policy is to spread hate speech. Your members do what they can.
- (DanTW1b) twittername must stop spreading hate speech using my [radio/ tv] license money.
- (DanTW2) Readily admit that I am shocked about Alternativet’s [left-wing party] high level of hate speech & questionable “bridge building” with extremists.
- (DanTW3) Yes, religion is a factor in unsuccessful integration. Sharia courts, hate speech in mosques etc.

On the counter-speech¹² side, just 10% qualify as counter-speech, defending minorities (DanTW4). Most (18.7%) are reactions from – mainly right-wing – targets of hate speech accusations, defending themselves or their

12 The term is here used to refer to ‘countering hate speech’ and ‘countering hate speech accusations’.

party/movement against what they perceive as a kind of hate speech, namely being *unjustly* accused of hate speech (DanTW5a). Right-wing counter-speech is often part of a defence narrative that the establishment has a monopoly over the very definition of hate speech, and that this definition is speaker identity-based rather than content- or form-based. A typical argument is that fact-based criticism of Islam is being made impossible because the (Islam-protecting) establishment will label it hate speech regardless of form and content (DanTW5b).

(DanTW4) So it was lucky that he wasn't also a poor refugee and Muslim, that way you should have seen "words to go along". Nice that you now are going to address the accelerating Danish hate speech against foreigners.

(DanTW5a) Yes super. 🤔 🤔 🤔 I guess some left-wing idiot will try to revert that by reporting us for racism, nazism, facism, hate speech and other spin. Many of them do love censorship and repression – clearly for want of arguments 🤔.

(DanTW5b) hey, of course we must have Turkey and Egypt and Saudi Arabia and the rest of the Muslim alliance in the UN tell us that we must not criticise religion ... Or whatever they come up with must be hate speech ...

About 44% of hate speech-mentioning posts address the term at a meta-level, mentioning or discussing relevant laws (12.6%, (DanTW6)), the role of social media companies in the containment of hate speech (23.2%, (DanTW7)) or the very definition of hate speech (8.5%, (DanTW8a–b)).

(DanTW6) §266b¹³ is a hate speech law that should never have been allowed in DK. It has been dictated by the UN and EU.

(DanTW7) When you ask tech giants to be arbiters of what constitutes hate speech, it almost always hits marginalised voices.

(DanTW8a) There's no such thing as "hate speech". It's just an opinion you don't share.

13 In Denmark, the basis for legal action against hate speech against groups is section 266b of the Danish Penal Code, colloquially called "racism paragraph".

(DanTW8b) Who decides what hate is, and where it stops? If hate speech just means somebody feels offended, everything is hate and every utterance can be censored away – no debate or exchange of opinions.

Section 266b of the Danish Penal Code covers denigration and threats against groups with protected characteristics, and focuses on message content (threatening, mocking, degrading) and its dissemination potential (“publicly or with the intention of wider dissemination”) rather than veracity of statements or message perception on the part of the target. Although criminal liability under section 266b does not depend primarily on how individual recipients perceive a message, which effectively limits the law’s impact on freedom of expression, freedom of speech is nevertheless a common topic in posts countering hate speech accusations (DanTW5b). Some posts also mention the truth aspect (DanTW9a–b), arguing that it should be allowed to cite statistical truths – even if these put a minority in a bad light. A third line of defence is that humour or irony can ameliorate an utterance that would otherwise be hate speech (DanTW10).

(DanTW9a) The truth is no defence. Truth can now be “hate speech”.

(DanTW9b) If pure and simple statistics are hate speech, it becomes difficult to speak freely.

(DanTW10) I never thought anything was off the table except harmful hate speech. Even a rape joke, given a correct context, can be lol.

Rather than providing a definition, meta-level posts point out that hate speech is subjective and difficult to define, and that perception is not a sufficient criterion. In the absence of an iron-clad definition, some users accuse the courts, the government and the leftist establishment of censorship and a kind of interpretation monopoly as to what constitutes hate speech (DanTW5a–b). A variant of this topic is the fear of arbitrary censorship in private and ‘algorithmic’ hands as social media companies are pressured into action against hate speech (DanTW7).

Similar to Danish Twitter, a large number of occurrences in the German corpus are in the context of hate speech accusations levelled at right-wing parties or politicians; however, overall more frequent are accusations of hate speech directed at what is labelled as the “left” (which includes the political centre and the societal mainstream) (GerTW1), minorities (GerTW2), as well as the media and journalists (GerTW3).

- (GerTW₁) At the forefront is Schäuble's [President of the federal parliament, MP for the centre-right CDU] unspeakable hate speech that Europe, which is so culturally rich, would vegetate in inbreeding without Nafris [derogatory term for migrants from northern Africa]. Dirtier left-wing agitation has rarely been heard.
- (GerTW₂) We are also just people who want to live according to our values but when you hear hate speech in mosques we are simply just kufar.
- (GerTW₃) For the most part, the only people working in public broadcasting seem to be people who are incapable of anything but hate speech.

By far the largest volume of occurrences (38%) are in meta-level tweets debating and defining the concept of hate speech. One, overall less frequent, discourse, sees hate speech as a danger online that requires strategic counteraction, often including references to right-wing extremism (GerTW₄). Negotiation of definitions occurs in discussions in which users argue the acceptability of linguistic form (GerTW₅).

- (GerTW₄) Warning from twittername: Words like #hatespeech do not accurately identify misanthropic¹⁴ ideologies in the digital space. Expose racism, anti-Semitism and right-wing ideologies on the Internet!
- (GerTW₅) For me, hate speech is when someone chooses vulgar insults, threatens criminal acts or compares people to animals, but not when one uses adjectives such as those you have mentioned. You are exaggerating this time with political correctness.

More typical, however, are hyperbolic and conspiracist posts, in which the term 'hate speech' co-occurs with references to moral emotions (anxiety, fear, disgust, anger, contempt) and self-positioning as targets of unequal treatment that breaches moral principles of fairness and justice. Three main dimensions of a discourse of marginalisation/insecuritisation, constructed via 'hate speech' can be described: 1) favouring others' speech over Germans' speech, 2) making Germans vulnerable to others' speech 3) outlawing speech by Germans. This

14 In the sense of hatred or contempt for groups of people (German '*menschenfeindlich*').

dimension of the metalinguistic activity of ‘debating and defining hate speech’, thus, revolves centrally around a perceived systemic bias in the use of the term, favouring and protecting cultural ‘others’. The term ‘hate speech’ is associated with insecurity and uncertainty for an ingroup of “us” (“Germans”) and condemnation and stigmatisation of variously defined others: ‘favouring others’ speech over Germans’ speech’, for example, involves the claim that the label ‘hate speech’ is only applied to certain types of opinions or language use, and that this disadvantages (certain groups of) Germans (GerTW6a–c).

- (GerTW6a) Calling police officers bastards is freedom of speech. Calling refugees pieces of gold is hate speech.
- (GerTW6b) As a matter of principle, hate speech never comes from the left, Muslims or government parties.
- (GerTW6c) If I, as a German, had said something like that, I would be charged with incitement to hate, hate speech and who knows what else.

‘Making Germans vulnerable to others’ speech’ frames ‘hate speech’ as a political concept that exists to disenfranchise and control Germans, alleging that they are no longer protected by their government and institutions. In these posts the term ‘hate speech’ is defined as an instrument of repression and marginalisation which threatens political discourse participation and expressions of national-cultural identity by Germans while at the same time not protecting them from hate speech by others (GerTW7a–c).

- (GerTW7a) Federal Court of Justice: «Dog breed» «German potato» «Shit German» «Kuffar» «Alman» none of this is hate speech. Our state is against us.
- (GerTW7b) If you write something like that about other people, you're in trouble for hate speech. That only works if you direct it at Germans ...
- (GerTW7c) We don't know ... Can there be hate speech against Germans?

In ‘outlawing speech by Germans’, hate speech is associated with censorship, prohibition of criticism (of Islam, the government), suppressing facts and the truth, denying reality, defamation, and political persecution through hate speech accusations (GerTW8a–c). These contexts include enactment

of discourses of repression of political opposition and dissent through self-stylisations as “dissidents” and “regime critics” who expose threats of control, social ostracism and harm enabled by the concept.

- (GerTW8a) One of the most dangerous trends of our time is to portray people’s opinions as hate speech and to make them illegal and socially intolerable through laws. #FreedomofSpeech
- (GerTW8b) The most important thing is that more Germans are being sentenced to heavy fines for “hate speech” and have their professional lives destroyed because they criticise violence by foreigners and asylum seekers.
- (GerTW8c) #typically German is to keep your mouth shut while your children are being raped by negroids, your wife is being stabbed by Muslims and you are in prison for hate speech.

4.2.2 Term Associations

Term association – using linguistic proximity at phrase and clause level as a measure of similarity between words – reveals further implicit conceptual dimensions of ‘hate speech’. In the corpus, ‘hate speech’ occurs in the following juxtapositions (Table 4), here defined as co-occurrence within the same sentence. As a measure for association strength we use the relative frequency ratio $F_{rel}(in-query)/F_{rel}(in-corpus)$, where $F_{rel}(in-query)$ is the (absolute) frequency of the target term (case-insensitive and including inflections and derivations) divided by the number of overall occurrences of ‘hate speech’ (including variations such as ‘hatespeech’, ‘#hatespeech’ and ‘HATE SPEECH’). Correspondingly, $F_{rel}(in-corpus)$ is the (absolute) frequency of the target term divided by the overall size of the Twitter corpus for Danish or German, respectively.¹⁵ Thus, the number given, in brackets, after an associated term in Table 4 means “x-times more common with ‘hate speech’ than in the background corpus”.

$$Association\ Strength = \frac{F_{rel}(in-query)}{F_{rel}(in-corpus)} = \frac{\frac{f(target\ term)_{query}}{N_{hate\ speech}}}{\frac{f(target\ term)_{corpus}}{N_{corpus}}}$$

¹⁵

TABLE 4 Term association (relative frequency measure for association strength)

Danish	German
– Racism (272) – Nazi (38), xenophobic (266) – Intolerant (184), bullying (313) – Truth condition: lies (40), <i>fake news</i> (962), disinformation (576); facts (55), statistics (40) – Insults (142) – Hate crime (4540), harassment (850), threats (581), discrimination (464), hate (244), violence (156) – Targets: minorities (581), Muslim (101), women (54), gender (112) – Freedom of speech (688), censorship (570), democracy (62)	– <i>Fake news</i> (674), lies (37) untruths (108), conspiracy theories (81) – Incitement to hatred (386), incitement of the masses (534) – Attack (33), violence (127), threat of violence (269), threat (171), hate crime (807), <i>Hate-crime</i> (55035) – Racism (144), discrimination (231), intolerance (211), exclusion (341) – Insults (301), defamation (286), harassment (247) – Xenophobia (229), hatred of foreigners (141) – Cyberbullying (3305), bullying (905), troll (159), trolling (142), <i>shitstorm</i> (282) – Censorship (638) – Islamophobia (170), hatred of Islam (83), Islamism (46), Islamisation (26) – Hate (269), brutalisation (401), misanthropy (410) – Propaganda (66), agitation (119), slogans (64), disinformation (582) – Expression of opinion (543), freedom of opinion (428), criticism (139) – Hostility to democracy (624) – Nazi (46), right-wing party (37), populism (99), right-wing extremism (228)

Italics indicate Anglicised terms in Danish and German.

The most common association on Danish Twitter is racism and a plethora of related terms (e.g. ‘Nazi’, ‘xenophobic’), mirroring the gist of section 266b, where the UN anti-racism convention was incorporated in 1971.¹⁶ And again, the folk perception of hate speech draws on the truth condition: spreading lies is

16 Racism and the linked topic of religion dominate the discussion. At least at the meta level, gender discrimination and sexual orientation (added in 1987) are not prominent topics in relation with hate speech on Danish Twitter.

associated with hate speech, just as truth and statistics are assumed to shield one against hate speech accusations. The fact that untrue accusations and insulting language are associated with hate speech suggests that in its folk version, the concept of hate speech subsumes three separate legal concepts in Danish law, with insults (section 267 of the Danish Penal Code ‘violation of honour’) and defamation (section 268), bleeding into the ‘racism’ paragraph (section 266b).

Two additional folk features of hate speech can be identified *via negationis* – that is, through a strategy of definition by exclusion. It is perceived as typical that it is indiscriminate and un-argued (DanTW11). Also, hate speech is clearly seen as hate *speech*, and distinguished from (hate) *actions*, albeit with the caveat that the former may cause the latter (DanTW12–13).

(DanTW11) when hate speech replaces arguments.

(DanTW12) hate speech is a precursor to physical violence.

(DanTW13) Politicians’ hate speech has legitimised primitive vigilante violence against innocent women.

The most common term associations in German are related to lying (‘fake news’, ‘untruths’, ‘conspiracy theories’) and ‘*Hetze*’, including ‘incitement of the masses’ (‘*Volksverhetzung*’). Three areas of meaning associations can be distinguished: 1) ‘hate speech’ connected with aggressive physical and verbal action online (e.g. ‘attack’, ‘violence’, ‘threat of/incitement to violence’, ‘hate crime’, ‘insults’, ‘defamation’, ‘harassment’, ‘cyberbullying’, ‘trolling’, ‘shitstorm’); 2) ‘hate speech’ connected with negative, exclusionary attitudes and sentiments (e.g. racism, xenophobia, intolerance, hate, misanthropy, Islamophobia, discrimination, brutalisation); and 3) ‘hate speech’ connected with political agitation and ideology more broadly (e.g. ‘fake news’, ‘incitement of hatred/the masses’, ‘censorship’, ‘propaganda’, ‘freedom of opinion’, ‘treason’). The latter includes ‘criticism’ as the most frequent association via negationis occurring as counter-speech in the context of alleged hate speech accusations (GerTW9–10).

(GerTW9) The radical left-wing state radio simply declares criticism of #asylum madness and uncontrolled #mass immigration as “hate speech”.

(GerTW10) people on the left who prematurely equate any criticism with hate speech.

5 Conclusion

The study empirically captures first order understandings of the term ‘hate speech’ outside Anglophone contexts, focusing on Danish and German linguacultural communities. The analysis demonstrates that English-language terms imported into other languages may emerge and function as highly localised, culture-specific templates for understanding and using language, tied to macro level discourses, socio-political structure and cultural beliefs. The analysis further indicates that for ordinary Danish and German language users, hate speech is not merely an issue of micro-level social interactions. The ‘hate speech’ token and the language use associated with it serves as a proxy for broader overtly politicised sociocultural concerns and anxieties about the social order at large. These insights are a starting point for bridging the gap between hate speech as a (supra-)national institutional (legal, policy) concept on the one hand and linguaculture-specific observable practice and lived interpretation on the other hand.

The results of the interview and corpus analyses reflect *momentary* conceptualisations of the linguistic and social operation of ‘hate speech’ in Danish and German, shaped by participants’ experiences, awareness of and responses to cooccurring discourses on social processes, publicised incidents, public debates, and political discourses, all of which are understood by participants to be of direct relevance to not only individual instances of social interaction involving ‘hate speech’, but also to the nature of social structure in their respective linguacultural communities. ‘Hate speech’ is thus a culture-specific descriptor of language use of a different order than, for example, ‘im/politeness’ (Kádár and House 2021) in that it is a pragmatically relevant abstract term and a concrete form of sociocultural behaviour which is, in the understanding of language users, intimately tied up with larger-scale sociocultural concerns. These concerns relate to cultural models of normative standards of public communicative behaviour, ideas of culture membership, intergroup relationships, and political governance. In both Danish and German popular reasoning and popular usage, the term ‘hate speech’ appears to encapsulate notions of destabilisation of linguacultural consensus on communicative norms and intergroup relationships, albeit in different ways.

Popular reasoning in the interviews reveals that for both Germans and Danes – while there is no one singular shared linguistic or conceptual understanding of the term – it is something that ‘normal’ people do not do. The perpetrators carry stigma: they are localised at the margins of society, not part of society; they are judged as lacking the capacity or inclination to comply with socially held values, norms, and rules for moral behaviour. Hate speech is

understood as incompatible with standards of language use because it contravenes a fundamental moral value of caring about (or not unduly harming) the other in interaction. The Danish views specifically suggest that hate speech is a breach of social norms and linguistic etiquette that govern culturally valued forms of communication (“*dialog*” ‘dialogue’, “*civiliseret almindelig samtale*”, ‘civilised ordinary conversation’), and which is normatively performed by exercising voluntary self-constraint despite the right to freedom of speech. Hate speech amounts to an ‘uneducated use of free speech’ (cf. Hervik 2014) by socially unattractive individuals with defective personalities, continuously transgressively pushing against the limits of standards of communicative behaviour, thereby further eroding individuals’ sense of being bound by normative moral constraints on their language choice. By contrast, a specifically German understanding includes that hate speech is targeted, other-oriented, verbally aggressive behaviour that must be tolerated to a degree because moral principles cannot be assumed to be universally shared and suppression may be counterproductive; however, the mindset that causes individuals to engage in hate speech should be corrected through formal education in schools. Hate speech is, thus, seen as reflecting a social need for moral instruction that needs to be addressed at the level of the system rather than the individual.

On Twitter, popular usage reveals its functionalisation as a metapragmatic evaluative token in politicised discursive practice. The ‘hate speech’ token is used to index claims of unfairness and injustice in displays of intergroup antagonism, however, with what appear to be culture-specific contextualisation: first, differences are observable in relation to the recruitment into political discourses demarcating rightful forms of speaking according to political (‘left’/‘right’) ideologies; second, while metapragmatic commentary links ‘hate speech’ to legal categories related to communication (insults, defamation, denigration and threats), related notions of truth, justifiability, and ‘sayability’ and, broadly, the communication channel (social media companies) on Danish Twitter, German metapragmatic commentary widens the referential domain of ‘hate speech’ into notions of violence, marginalisation, and political contestation. This suggests that the metapragmatic token ‘hate speech’, in stark contrast with legal and political definitions of the term, is conceptually vague bar core moral meanings of ‘causing harm’ and ‘injustice/unfairness’. It is available both for indexing instances of harmful/unjust speech and as a discursive object that symbolises political harm/injustice itself. This facilitates its appropriation into the performance of linguaculturally relevant competing discourses on public goods aligned with notions of moral rectitude.

The fact that popular reasoning in both languages does not mention the discursive uses of the ‘hate speech’ metapragmatic token highlights not only a

lack of metalinguistic and metacommunicative awareness but also possibly a disconnect between online linguistic practice and social reality more broadly. Moreover, the linguacultural variation in moral orientations and ideological functionalisation underscores the limits of cross-cultural comparability of descriptors of language use, even where it concerns the same term, its lexically identical loan translations and two geographically adjacent cultural systems with intertwined political histories. The concurrence of a lack of metacommunicative awareness and local contextualisation practices shaping the Danish and German folk understandings of 'hate speech' thus highlight the challenges for the identification and regulation of hate speech, as well as for fostering shared public understandings of these above the level of individual linguacultural contexts – as well as within.

Biographical Notes

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Acknowledgements

We are indebted to the interviewers and XPEROS project members Andrea Kleene, Rasmus Nielsen and Martin Carsholtt Unger.

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Appendix

Tables A–C contain the full overview of coded categories, grouped by thematic similarity. The category labels are based on the language of the interviewees; as such they do not represent linguistic categories.

TABLE A Features of a shared *hate speech* understanding in Danish and German; mentioned at least twice in two interviews in each the Danish and German sets and by at least one quarter of the total of interviewees (Harding 2019)

What is <i>hate speech</i>	Who does it?	Who are the targets?	Why does it happen?	How is it assessed?	What are the effects?
Berating someone; speaking ill of someone (28)	The political/ideological right (people, parties, movements) (19)	Politicians, parties, political ideologies (left, green, right) (19)	Lack of education, not knowing right from wrong (28)	Nonsense, madness, something stupid (26)	Creates insecurity, division, hate, disinhibition, radicalisation (9)
Generalisation of groups, negative stereotyping (18), prejudice (5); scapegoating (10); racist comments (10)	People who have personal problems, experience frustration (30)	Foreigners, Arabs, 'ethnicities', people of colour, 'cultural groups', non-natives (17)	Social media create publicity for everyone; anonymity tempts people to cross the line (26)	Doesn't contribute anything to the formation of public opinion (5); the opposite of meaningful discourse and real communication (5)	
Denigration, devaluation, intentionally causing injury, talking someone down, shaming (23)	People with low educational attainment (27)	LGBTI+ people (15)	Media create the space for hate speech (10); in response to themes driven by the media (7)	Language use must be acceptable (14); choice of words, linguistic form can	
Insults (16); threats (21); swear words (24); calls for	People with little self-esteem, who need an identity; whose	Refugees (16); migrants (11)			
		Women (12)			

TABLE A Features of a shared *hate speech* understanding in Danish and German (*cont.*)

What is <i>hate speech</i>	Who does it?	Who are the targets?	Why does it happen?	How is it assessed?	What are the effects?
violence, malevolent wishes (8); dehumanisation (4)	lives are empty; who are bored and have too much time on their hands (21)	Minorities, unspecified (12)	Polarised themes (media, politics) (9); politicisation of issues (6)	make it more severe (5)	
Spreading lies and untruths online, 'fake news' (7); bullying (5); trolling (6)	Men (9)			Difficult to determine the boundaries between <i>hate speech</i> and 'freedom of expression' (13)	
Depends on word choice (15); can be indirect, subtle (9)				What hurts others (physically, mentally) crosses the line (10)	
Expression of hate/anger (10); difference between spontaneous emotional reaction and acting out of conviction (7)				Must be countered, marginalised (9)	
Depends on perception, who says it, how it is meant (11); personal definition might differ from official definition (4)					

TABLE B Features of understanding *hate speech* in Danish

What is <i>hate speech</i>	Who does it?	Who are the targets?	Why does it happen?	How is it assessed?	What are the effects?
Speaking disparagingly of or to someone ('svine til') (5)	People with flawed personalities (lazy, sick, self-centred, incompetent, living sad lives) who are unpleasant, can't be respected (11*)	Vegans, vegetarians (4*)	Everyday sexism, chauvinism (4)	Feelings of anger and fury, feeling tired, feeling affected by it, not understanding why people express themselves in this way, not courageous enough to talk back (12)	Continuous shift of the limits of what can be said (5)
Act or speak 'ugly' (3); bad style, bad tone of voice (5*)					
Being condescending (4); making fun of groups (4*)				People have a right to their opinions (8)	
Shifting discourse to the extreme (right) (5)	Ignorant people who are too stupid to understand what they are doing (6)			Freedom of opinion is not duty to express one's opinion (8)	
Assertions are more permissible than performative speech acts (e.g. threat, malevolent wish) (4)	People who've not been brought up well (4*)			One has a responsibility towards fellow human beings (8)	
Hate speech is what is stated in the law ('racism paragraph') (4)				Internet/social media are still a new form of communication (5)	

*indicates one mention in the German interviews.

TABLE C Features of understanding *hate speech* in German

What is <i>hate speech</i>	Who does it?	How is it assessed?
Verbal abuse to relieve personal frustrations ('auskotzen'), provoke someone in public with insolent, insulting statements ('pöbeln') (12); incite hatred ('hetzen') (7)	People who have an agenda (6*)	One must tolerate other opinions (7*)
Based on Nazi topoi (9)		People need to be better educated (about using online media) in schools (7*)
If something gets 'personal' ('below the belt') (8*); defamation (6*)		

*indicates one mention in the Danish interviews.

Interview Guide: Perceptions and Experiences of Hate Speech. Main Interview Questions Only, without Probes

Familiarity with the concept

- Have you heard the term “hate speech” before?
- What does the term mean to you?
- Are there other terms or expressions you associate with hate speech?
- How would you define hate speech?

Targets

- Who do you think is most commonly targeted by hate speech?

Media Use and Exposure

- Can you tell me about your use of social media, online news platforms or comment sections?
- Where do you encounter hate speech most frequently, if at all?

Direct experiences

- Have you ever been the target of hate speech yourself?
- How did you respond?

Experiences of others

- Have any of your friends, family members, or colleagues experienced hate speech?
- How did they react?
- How did you react?

Encountering hate speech

- Have you personally seen or read hateful comments online?

Personal reactions

- How do you usually react when you encounter hate speech?

Responsibility and intervention

- Do you think individuals have a responsibility to respond to hate speech when they encounter it?

Reporting behaviour

- Have you ever reported or filed a complaint about hate speech?

Societal significance

- Do you consider hate speech to be a problem in society today?
- Do you think more should be done to address hate speech?
- What measures would be effective?
- Who should be responsible for addressing it?

Legal regulation

- Are you aware of any laws or regulations concerning hate speech?

Freedom of expression

- Some people argue that regulations against hate speech restrict freedom of expression. What is your view?

Artistic freedom

- Some people argue that artists have more leeway because of artistic freedom. What is your view?

Understanding perpetrators

- When you think of people who post hateful comments online, who comes to mind?
- Do you have any understanding or sympathy for these people?

Accountability

- Should people who engage in hate speech face consequences?

Severity and distinctions

- Do you think there are different degrees or forms of hate speech?

Evaluating examples

- I would like to discuss some examples. How would you evaluate each of them?
- Is it hate speech?
- How harmful is it?
- Should it be reported or sanctioned?
- Does your assessment depend on who is being targeted?

Thresholds for action

- At what point would you report or formally complain about a comment?

Engagement with the topic

- Is hate speech an issue that you think about or engage with beyond your everyday experiences?

Language use

- Have you ever used expressions or terms that others might consider offensive toward particular groups?
- How do you distinguish between humour, offense, and hate speech?

Socio-demographic background Information