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Abstract

The perspective of this dissertation is a comparison between the integration policies of Denmark and Sweden between 1960, when there was a shift toward non-Nordic and non-European immigration, and 2006. The two countries’ policies continued to diverge in the cultural integration domain. In Denmark, ideas stemming from a policy legacy, and promoting the national culture, prevented multiculturalism from taking root. In Sweden, it was—above all—Olof Palme, the slain activist, in his capacity as Minister of Culture and Prime Minister, who engineered the advent of multiculturalism.

Danish policy makers chose a policy of toleration. That is, the disapproval of immigrants’ cultural practices in the public sphere but the non-interference of the state in the private sphere as long as these practices did not harm the majority. In Sweden, the cultural embeddedness of immigrants was promoted until the mid-1990s. After that time ethnocultural diversity was portrayed as a source of cultural enrichment, a remedy against racism and xenophobia, and lastly as a means of taking advantage of globalization especially in economic terms.

Their policies converged in the socioeconomic and political integration domains. Both states sought to maximize their interests by emphasizing employment and self-help among immigrants, but they continued to consolidate immigrants’ socioeconomic rights, mainly through anti-discrimination policies. Despite the fear of globalization, a rise in the number of refugees, and xenophobia from the 1990s onwards, all these policies were “locked” in their trajectories.

Total number of words: 95, 914. Keywords: assimilation, comparative public policy, Denmark, immigration, integration, multiculturalism, public policy, Sweden, Scandinavia.
To my paternal and maternal grandparents,
Who planted the tree of education in our family.

To my mother and my father,
Who have watered it every single day of their lives.
Acknowledgements

My interest for migration issues goes back to my young days in Cameroon, when I became fascinated by the history of emigration to America. However, it was really the tragic London terrorist bombings of 7 July 2005 that I witnessed during my stay in England, which launched my journey into the world of I & I (Immigration and Integration) studies and led me to write, first, a master’s degree thesis, and then the present PhD thesis.

Yet this interest would not have materialized without external help, above all, the award of a prestigious New Zealand International Doctoral Research scholarship in 2006 by the New Zealand government. The State, but also its servants, worked diligently to help me come to New Zealand. These were: Ms Camilla Swan, the scholarship manager at the Ministry of Education in Wellington, Dr Shaun Goldfinch now at Nottingham School of Business in the United Kingdom (UK), Professor Bill Harris, our current Head of Department, and Ms Rebecca Guest at the Scholarship Office at Otago University.

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gratitude. Yet, this work is mine and I bear the entire responsibility for its content.
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<th>Description</th>
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<tr>
<td>Betänkande</td>
<td>Parliamentary committee report, Sweden</td>
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<tr>
<td>Betænkning</td>
<td>Parliamentary committee report, Denmark</td>
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<tr>
<td>Centerpartiet</td>
<td>The Centre Party, Sweden</td>
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<tr>
<td>Dansk Folkeparti</td>
<td>Danish People's Party</td>
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<td>Det Konservative Folkeparti</td>
<td>Conservative People's Party, Denmark</td>
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<td>Det Radikale Venstre</td>
<td>Social Liberal Party, Denmark</td>
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<td>Direktiv</td>
<td>Commission terms of reference, Sweden</td>
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<td>DRC</td>
<td>Danish Refugee Council</td>
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<tr>
<td>Enhedslisten (EL)</td>
<td>The Red-Green Alliance, Denmark</td>
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<tr>
<td>FGM</td>
<td>Female Genital Mutilation</td>
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<tr>
<td>Folkpartiet Liberalalerna</td>
<td>The Liberal Party, Sweden</td>
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<tr>
<td>Folketinget</td>
<td>Danish Parliament</td>
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<tr>
<td>Fremskridtspartiet</td>
<td>Progress Party, Denmark</td>
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<tr>
<td>Kristen Demokratisk Samling</td>
<td>Christian Democratic Union, Sweden</td>
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<tr>
<td>Kristendemokraterne</td>
<td>Christian People's Party, Denmark</td>
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<tr>
<td>Kulturutskottet, (KrU)</td>
<td>Parliamentary committee on culture, Sweden</td>
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<tr>
<td>Landsorganisationen (LO):</td>
<td>The Confederation of Trade Unions, Sweden</td>
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<tr>
<td>Landsorganisationen (LO):</td>
<td>The Confederation of Trade Unions, Denmark</td>
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<tr>
<td>Lov</td>
<td>Law, Danish government Bill.</td>
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<tr>
<td>Miljöpartiet de Gröna</td>
<td>The Green Party of Sweden</td>
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<tr>
<td>Moderata Samlingspartiet</td>
<td>The Moderate Party, Conservatives, Sweden</td>
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<tr>
<td>Motion</td>
<td>Parliamentary motion, Sweden</td>
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<td>Propositionen (Prop.)</td>
<td>Swedish government Bill</td>
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<tr>
<td>Riksdag</td>
<td>Swedish Parliament</td>
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<td>Socialdemokratiska Arbetpartiet, (SAP):</td>
<td>Social Democratic Party, Sweden</td>
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<td>Socialdemokraterne (SDP):</td>
<td>Social Democrats, Denmark</td>
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<td>Socialistisk Folkeparti (SF):</td>
<td>Socialist People’s Party, Denmark</td>
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<tr>
<td>Statens Offentliga Utredningar (SOU):</td>
<td>State-induced Commission of Enquiry</td>
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<tr>
<td>Venstre</td>
<td>Liberal Party, Denmark</td>
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<tr>
<td>VKO</td>
<td>Coalition of Danish Liberals and Conservatives</td>
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<tr>
<td>Vänsterpartiet</td>
<td>The Left Party of Sweden (ex-communist)</td>
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Introduction

i) Background

Denmark and Sweden are what comparativists call two “most-similar designs”. Sten Berglund writes that “[f]ew countries are more suitable for systematic, comparative analysis than the four Nordic countries, Denmark, Finland, Sweden and Norway. The similarities between Denmark and Sweden are numerous”. The two countries are neighbours, located in Scandinavia. They also share many historical experiences. The majority of their respective populations descend from the Vikings, the seafaring conquerors and traders who plied the coasts of Western Europe between 700 AD and 1100 AD.

Between 1397 and 1523, they were both members of the Kalmar Union, an empire ruled by Denmark, whose demise gave way to the birth of the Swedish modern state. Over many centuries, the region of Scania in current South-East Sweden changed hands several times until the signing of the Peace Treaty of Roskilde in 1658. Today it forms, with the Danish regions across the strait, an integrated economic region called Øresund (The Sound) and has a total of 3.7 million inhabitants.

Politically, the two countries are constitutional monarchies with a monocameral parliamentary system. Various authors, from Marquis Child in the 1930s to Elder et al., David

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3 Scandinavia commonly comprises Denmark, Iceland, Norway and Sweden and their location in the outer layer of Northern Europe. Nordic is a broader term which includes Finland, whose national language differs markedly from the four other countries. However, both terms are used interchangeably. Continental Scandinavia is a term which excludes Iceland.
4 The Union included Norway, Sweden and Denmark. The Swedish nobility became resentful of the rule of King Christian II, a Dane whom they accused of bias towards Denmark. The King attempted to massacre the nobility in the infamous “Stockholm Bloodbath” in 1520. This initiated a rebellion led by Gustav Vasa that resulted in the breakaway of Sweden in 1523.
6 In the Swedish language, it is written as Öresund.
Arter, Arend Lijphart and Jan Erik Lane more recently, have claimed a “Scandinavian model of government”. While descriptions of the model vary, its most defining feature is identified as consensual politics.

According to Elder et al., consensual politics is “characterized by a low level of opposition to the framework of rules and regulations for the resolution of political conflict within the state”. It operates through the commission system. Commissions are teams appointed by the government to formulate policies according to the government’s terms of reference. Some of these commissions consist exclusively of experts; others include opposition and government parliamentarians. Upon receiving the commission’s final report, the government usually submits it to social stakeholders for consultation. This consultation is almost ritualistic in the sense that most policy bills follow this procedure.

It has also been claimed that there is a “Scandinavian political system”, an “imperfect 5-party system” which emerged by 1930. Sten Berglund and Ulf Lindström state that this system is divided along a left/right cleavage, with Social Democratic and Communist parties on one side and Conservative, Liberal and Agrarian parties on the other. Based on the work of Seymour Martin Lipset and Stein Rokkan on party formation in Western Europe, Arter claims that each party emerged at a particular period of time and appealed to a specific segment of society.

The Conservative and Liberal parties emerged in Denmark and Sweden following national revolutions to defend the interests of the bourgeoisie. The Industrial Revolution gave rise to centralist (typically agrarian) parties who defended the interests of farmers. The Russian


11 Commissions of enquiry, the government and the parliamentarians tap all stakeholders’ opinions. However, governments are not compelled to follow through these opinions. See equally Hammar, Tomas (1985) (ed.) “Sweden” in European Immigration Policy: A Comparative Study, Cambridge: Cambridge University Press, p. 45.


13 Ibid.


16 Bourgeoisie is defined throughout this research as the wealthy urban class of merchants.
Revolution and the ensuing polemic over membership to the Comitern, the Internal Communist Organisation sworn to overthrow capitalism even by force, split the labour movement into social democratic and communist parties. However, since the 1970s, the period Arter calls the “thawing”, the emergence of new parliamentary parties (protest parties, Christian parties and the Ecologists) during “earthquake elections” have permanently modified this Scandinavian model and the political landscape.

In international relations, Denmark and Sweden are often ranked together as small nations, although the latter is five times larger than the former and twice as populous. Their foreign policies are embodied in the concept of “Nordic internationalism” which, according to Peter A. Lawler, underpins “a UN-centred world order, the development of a robust international legal regime, the promotion of mediation-based conflict resolution, and, perhaps most distinctively, the provision of overseas development assistance (ODA)”. However, Lawler points out that there is a particular Danish strand of this internationalism, which combines a mix of nationalism and international solidarity which he calls a “Janus-faced solidarity”. This entails the provision of generous help to countries afflicted by war as long as it does not involve immigration. In addition, both countries have a tradition of neutrality that was described as “non-alliance in peacetime in order to stay neutral in event of war.” They were both neutral during the two World Wars despite the violation of Denmark’s sovereignty by the Nazi invasion on 9 April 1940 and its decision to join the US-led coalition in Iraq in 2003.

17 Ibid., pp. 51-52.
18 Ibid., p. 98.
20 Denmark has a land area of 43,561 sq km and a population size of 5,534,738 (1 January 2010). Agerskov, Ulla (2010) (ed.) Nordic Statistical Yearbook, Copenhagen: Nordic Council of Ministers, p. 9. The country has two autonomous territories: Greenland, which has a population of 56, 452 inhabitants and a land area of 410,449 sq km, and the Faroe Islands, which occupy a land area of 1,387 sq km and have a population of 19,873 (1 January 2010). Sweden’s land area is 450,295 sq km and its population is 9,340,682 (1 January 2010). Agerskov, Ulla (2010) (ed.) Nordic Statistical Yearbook, p. 16.
Economically, the two states are part of the same customs union. Since 1 July 1954 they have both belonged to the Nordic Common Labour Market. They also belong to the European Union. However, Denmark acceded to the Union in 1973, whereas Sweden acceded in 1995. Their economies are export-oriented and their industries are often praised for their sense of innovation and their use of technology. Both are high-income countries.

Socially, their populations speak closely-related languages and are, in their majority, Lutheran. According to Gøsta Esping-Andersen, they have the same social welfare regime, with their adoption of a Social Democratic model. This system is characterized by universal access to welfare, the absence of stigmatization against welfare recipients, corporatist agreements between government, labour organizations and employers, and a high degree of decommodification. Like other European countries, the populations of Denmark and Sweden are ageing. People marry late and have fewer children than before. Their total fertility rates (1.84 live births per woman for Denmark and 1.93 for Sweden) are below the normal replacement rate of 2.1% and, without immigration, they would be much lower. According to some experts, if this trend persists, their generous welfare systems will become unsustainable in a few decades. Skills shortages will also worsen in sectors such as health care, science, and technology, which are crucial to their economic competitiveness and growth.

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23 The Nordic Union also consists of several regional institutions, e.g. the Nordic Parliament and the Nordic Cultural Council.
24 For an explanation of this divergence, see Ingebritsen, Christine; Neumann, Iver; Gstohl, Sieglinde and Beyer, Jessica (2006) (eds.) Small States in International Relations.
26 The Danish and Swedish languages belong to the Scandinavian branch of the Indo-European language family.
More importantly, both countries have undergone similar migration trends and face the same challenges with regard to the integration of non-Western immigrants. Once they were ethnically homogeneous. However, they became host to immigrant groups, among which are many non-Western Muslims. These people face deep-seated prejudices which, with harder economic times, have led to the creation of ghettos and growing religious radicalization. This situation has raised the spectre of a “clash of civilizations” in the larger public and fears about the sustainability of the welfare system. It has also prompted an intense debate over cultural diversity, immigration and citizenship—three potentially explosive issues which reinforce each other and which Will Kymlicka calls the “three-legged stool”.

As such, in reaction to the passage of restrictive immigration measures by the new centre-right coalition of the Danish Liberals and Conservatives (VKO) with the support of the far-right Danish People’s Party in 2002, the Swedish government accused their Danish counterparts of undermining “Scandinavian” solidarity. That is, their tradition of coordination and cooperation on immigration and citizenship issues. Conversely, Danish policymakers have invited Swedish policymakers to adopt their policies. Pia Kjærsgaard, the leader of the Danish People’s Party, declared that “If they [Swedes] want to turn Stockholm, Gothenburg or Malmö into a Scandinavian Beirut, with clan wars, honour killings and gang rapes, let them do it. We can always put a barrier on the Øresund Bridge.”

This antagonism between Swedish and Danish politicians is even present in public opinion. Bo Petersson writes that:

[i]n Sweden the image prevails of Denmark as a den of intolerance, racism, and xenophobia, whereas Sweden is depicted in Denmark as a land of

33 Anti-immigrant feeling and xenophobia are high in both countries, although a far-right party has been more successful in Denmark than in Sweden. Rydgren, Jens (2010) “Radical Right-wing Populism in Denmark and Sweden: Explaining Party System Change and Stability”, SAIS Review, Vol. 30, No 1, p. 66.
34 Radical Islamists preach the “Jihad”, a holy war aimed at establishing a Muslim Caliphate (rule) worldwide. For an account of Al Qaeda and Islamic extremism, see Burke, Jason (2004) Al-Qaeda: The True Story of Radical Islam, New York: I.B. Tauris.
multiculturalism and political correctness, where people’s real opinions about immigration and integration are not allowed to be articulated.\textsuperscript{38}

Puzzlingly in the 1960s, when non-Nordic immigrants became the main component of its immigration intake, Sweden opted for multiculturalism. However, a confusion ensued over whether the “freedom of choice” goal of the Bill, Prop. 1975:26 Riktlinjer för Invandrar- och Minoritettpolitiken \textit{m.m} (Guidelines for Immigrant and Minority Policy) meant multiculturalism. Scholars and policymakers argued inconclusively until the early 1980s after which a status quo prevailed. As for Denmark, it was not until the 1990s that a consensus prevailed among scholars that policymakers in the two countries followed different policy paths. While Denmark adopted a more stringent immigration policy and assimilation, Sweden opted for a more generous immigration policy and multiculturalism. Furthermore, politicians on both sides criticised and even sought to influence policy in each other’s countries.

\textbf{ii) Literature Review}

Surprisingly, given the interest in Denmark following the Cartoon Controversy in 2005/2006, the status of Sweden as a major destination for refugees, as well as the prominent role that the state plays in migration outcomes,\textsuperscript{39} the current literature on Danish and Swedish integration policies is thin both in output and the variety of issues examined. Existing immigration studies often involve a few select countries: France, Great Britain, Germany and the USA. To concur with Adrian Favell, there is a dearth of cross-national comparative studies “able to span the very different experiences and national conceptualizations of such complex processes of social change in these countries”.\textsuperscript{40}

\textsuperscript{40} Favell, Adrian (2001) “Integration Policy and Integration Research in Europe: A Review and Critique” in Aleinikoff, Alexander, T. and Klusmeyer, Doug (eds.) \textit{Citizenship Today: Global Perspectives and Practices}, Washington, DC: Brookings Institute/Carnegie Endowment for International Peace, p. 349. Three research clusters, in general, have emerged in the study of migration policy and politics. The first, the “politics of security”, deals with the impact of immigration on national security. It investigates how migration affects the sovereignty and security of the nation-state. The second, “the politics of control”, centres on the ability of the nation-state to stop immigration. Its most topical issue is the “gap hypothesis”. It gained currency in the 1990s as it became obvious that immigration showed no sign of abating despite the tightening of admission rules in Western countries. The main research question within this cluster investigates why policies designed to restrict immigration often produce opposite results, and why despite the general opposition of the public to immigration, policymakers end up formulating more inclusive policies. These two clusters are out of the scope of this study. The third cluster, the “politics of incorporation”, examines the socioeconomic, political and cultural integration of immigrants in the society and its relation with issues such as citizenship and national identity. See Hollifield, James, F. (2000) “The Politics of International Migration: How Can We Bring the State Back In?” in Brettell,
The only book-length publication on the two countries’ immigrant integration is “Bortom stereotyperna? Invandrare och integration i Danmark och Sverige” (Beyond Stereotypes? Immigrants and Integration in Denmark and Sweden) co-edited by Bo Petersson, Ulf Hedetoft and Lina Sturfelt. Its objective is to explain the national character of each country and, subsequently, their different views on integration, cultural diversity and national identity. While the book casts a wide net on integration issues and provides first-rate analysis from some of the countries’ best experts, its conclusions are fragmented and it is not a systematic treatment of the subject. A small number of journal publications provide comparative studies of the two countries on some aspects of the topic, but the remaining are single-country studies.

A) Research on Policy Origins

The existing research on the origins of their policies fall into five main argumentative strands. The first strand, “the human agency and belief theory” ascribes policy divergence to people and their ideas. Most studies emphasize the influence of the nationalist and Christian ideology preached by the 19th century priest and activist, Nikolai Frederik Severin Grundtvig (1783-1872), arguably the country most popular ideological figure. Grundtvig preached an ideology which bestowed power upon the congregation rather than the clergy or the Bible and promoted adult education and Danishness. Ole Vind and Urban Claesson argue that the support which Grundtvig gained from the strong peasant movement, combined with the spread of agrarian capitalism and the ascent of the Liberal Party, Venstre, around 1900, ensured the success of his nationalist ideas. The two authors agree that the absence of a peasant class in Sweden explains why the country took a separate course. However, while Vind points out the absence of a similar ideological and religious movement, Claesson disagrees, citing the presence of two Swedish nationalist figures, the famed Lundian poet, Esaias Tegnèr (1782-1846), and the Uppsala intellectual, Erik Gustaf Geijer (1783-1847).


Tegnér was a lecturer at Lund University. His eminent work is Fridthjof’s Saga, a Norse romance, available at http://www.gutenberg.org/cache/epub/3759/pg3759.html, last accessed 28 June 2011.
The church historian, Elisabeth Gerle, makes a slightly different but related claim. She asserts that dissimilar ideational traditions within the Lutheran church in Denmark and Sweden led to a different attitude toward human rights and, consequently, immigrants.\textsuperscript{45} In Denmark, the religious and the national went hand in hand, whereas in Sweden, the Church was more likely to follow international human rights.\textsuperscript{46} While the arguments mentioned above have a degree of currency, the authors do not demonstrate how these mechanisms affected government policy making; for example, how Danish and Swedish policymakers were influenced in their ideas and actions respectively by Grundtvig’s heritage and the Swedish Lutheran Church at the birth of multiculturalism in the 1960s.

The second strand, “pressure groups”, highlights the role of bureaucracy and interest groups. Tomas Hammar writes that the complaints against the laissez-faire attitude of politicians lodged by bureaucrats and LO, the Confederation of Trade Unions compelled politicians to action.\textsuperscript{47} Christer Lundh goes one step further. He suggests that following the government’s decision to stop labour immigration, LO urged the government to provide foreign workers with equality and freedom of choice, including the freedom either to retain their culture or assimilate.\textsuperscript{48} However, many questions are unanswered. First, does freedom of choice constitute multiculturalism given the polemic which has surrounded the issue? Second, how concretely did LO affect policymakers who were so apathetic to integration issues as Hammar states? While, indeed, LO influenced the government’s decision to stop labour immigration according to a 1947 agreement, a similar process with regard to multiculturalism is not demonstrated.

The third strand, “the international society or globalization theory”, views the origins of Sweden’s integration policy as a whole, as rooted in international ideas. Lars-Erik Hansen argues that after a racialist policy phase which lasted until the Nazi invasion of Denmark on 9 April 1940, the Swedish government adopted a more active and “internationalist” foreign policy. This foreign policy which actively promoted human rights and supported civil rights movements in South Africa, the USA and other corners of the world, also laid the ground for a
generous immigration policy and cultural equality (multiculturalism).

A more “wholesome” claim was made by Yasemin Soysal in a comparative study of the integration policies of six European countries, including Sweden and Denmark to some extent, published in 1994. Soysal writes that “[t]he rights and claims of individuals are legitimated by ideologies grounded in a transnational community, through international codes, conventions and laws on human rights, independent of their citizenship in a nation state.”

While I agree with Hansen and Soysal on the salience of this human rights ideology, it appears that its impact has been limited to civil and socioeconomic issues. Therefore it does not explain why Sweden, Denmark and a country such as France have opted for different ethnocultural policies despite being parties to the same human rights instruments.

The fourth strand, “electoral politics and political behaviour”, emphasizes the impact of political parties. Ola Fransson maintains that the intellectual and Lutheran priest, Søren Krarup, a current member of the far-right Danish People’s Party, framed a conception of the nation based on a cultural and political unity. Krarup used the national figure, Grundtvig, as a power factor in the 1990s. For Jens Rydgren and Robert Karpantschof, this divergence comes from the success of the Danish People’s Party, which—unlike its Swedish equivalent, Ny Demokrati (New Democracy)—became a power broker. Christoffer Green-Pedersen and Jesper Krogstrup explain the difference between the countries by the prominence given to immigration issues in agenda setting. In contrast to Sweden, the anti-immigrant mood of the Danish public presented right-wing parties with the opportunity to gain votes by mobilizing immigration issues. However, in a subsequent article, Christoffer Green-Pedersen and Pontus Odmalm attribute this policy divergence to the greater strength but lesser stability of Danish centre-right parties. They posit that this factor led right-wing parties to form a coalition government with the Danish People’s Party. Lastly, Jonathan Friedman and Kajsa E. Friedman claim that the prevalence of political correctness in Sweden, in contrast to Denmark,

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51 French republicanism is widely touted as the classic model of assimilation. I examine it in a subsequent chapter.
53 Rydgren, Jens (2010) “Radical Right -wing Populism in Denmark and Sweden”.
55 New Democracy entered the Riksdag in 1991 before folding quickly.
is the means by which Swedish governments have contained a public opinion which has become restive about immigration. However, these studies ignore prior policy developments. These factors may have more explanatory power for the strength (passive or active) of these policies rather than their nature or origins. They do not explain for example why, in contrast to their Danish counterparts, Swedish main political parties quarantined their far-right party.

**B) Research on Policy Forms and Evolution**

Concerning the nature of these policies, one cluster of studies, embodied by the work of Lærke K. Holm and Erik Berggren, espouses the nationalist thesis. According to Holm, Danish integration policy is ethno-nationalist and there are three strategies of legitimization:

- The “defensive ethno-nationalist” discourse recurrent in the 1970s which claimed that cultural pluralism and large-scale immigration were positive neither for the Danes nor for immigrants because of the wide cultural gap between them.

- The “offensive ethno-nationalist” discourse promoted by right wing parties from 1987/1988, which stated that “Danishness” was a precondition for a well-functioning society. Denmark was a Christian country and immigrants should keep their religion in the private sphere.

- The “semi-ethno-nationalist discourse” of the Social Democrats and the centrist Radical Liberals, who advocated both assimilation to Danish culture and cultural pluralism.

She also acknowledges the existence of a counter-discourse, the “post-national discourse” based on welfare state egalitarianism, which she says was most recurrent in the 1970s and 1980s and actively supported by the far left Socialist People’s Party (SF), the Red-

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63 Ibid. p. 357.

64 Ibid. p. 338.
Green Alliance (EL) and the Radical Liberal Party (RV). However, starting in the 1990s, these parties—including the far-left parties—changed their rhetoric and chose instead to focus on refugees’ rights. Erik Berggren claims that Denmark now displays aspects of a fascist state because of the electoralist goals of Danish politicians and the influence of the far-right Danish People’s Party. Both have successfully swayed public opinion which is not overtly racist. While these arguments may be plausible, they are too generalist and relate more to political behaviour than to public policy. As for discourse analysis, the authors do not show how this translates into public policy.

A second cluster advances a post-national citizenship argument. Kerstin Hvenegård-Lassen does not question the salience of the official policy line put forward by Danish policymakers: equality or “på lige fod” (on equal footing). She seeks instead to deconstruct it. She states that politicians’ discourses centered on ways to promote the equal participation of immigrants in all the sectors of society: employment, political participation, culture, and so on. Per Mouritsen affirm that socioeconomic and cultural equality form the basis of the two countries’ integration policies. He points out however, concerning Danish policy, that this “civic-universalist” conception of citizenship is inward-looking. In Sweden, Lars-Erik Hansen arrives at the same conclusions as Hvenegård-Lassen in a study of the Riksdag’s debates. He writes that public discourses reflected the official objectives of the 1975 Bill, “Jämlikhet” (equality), “Valfrihet” (freedom of choice) and “Samverkan” (cooperation). The word “equality” was used “primarily to illustrate various means of expanding opportunities for immigrants: social and economic equality.” However, the author suggests that “freedom of choice” constitutes a certain threat to the implementation of equality.”

viz. the Saami in Sweden, the Inuit in Greenland, and the inhabitants of the Faroe Islands in Denmark.\textsuperscript{70}

Yasemin Soysal distinguishes three types of membership models for Western countries depending on whether the main actor is the state or a societal group, and whether the administration is centralized or decentralized: corporatist, liberal or statist.\textsuperscript{71} In the corporatist model, communal groups based on religion or ethnicity are in the driving seat of the integration engine and are supported by the state. Immigrants’ access to state-sponsored services and programmes is conditioned by their membership and participation in these associations. Sweden and the Netherlands are examples of this model.\textsuperscript{72}

In the liberal model, exemplified by Britain and Switzerland, individuals and charity organizations are the principal actors and enjoy a high degree of autonomy from the state. “[T]he labor market is the main instrument of incorporation”.\textsuperscript{73} In the statist model, state bureaucracy initiates and implements integration policy. As in the liberal model, and in contrast to the corporatist model, immigrants are targeted individually. France is a prominent example.\textsuperscript{74} Soysal’s typology deals with policy implementation, particularly organisational design.

All these arguments are illuminating in their various scopes; however the proliferation of typologies does not bring any cohesion to the debate. Authors need to formulate more uniformizing conceptualizations or work within the scope of existing ones. Scientific enquiry will be improved and enhanced. An example is the concept of toleration that has recently gained enormous currency in the study of cultural integration policy. Indeed, authors need to distinguish between socioeconomic, political and cultural issues. They ought to specify which policy areas they investigate and if necessary how each of these pieces contributes to the big picture.

While some themes overlap, this task is crucial because the few studies that make this distinction arrive at starkly different conclusions. Martin Bak Jørgensen reveals that political actors in both countries put an emphasis on work and anti-discrimination. However, he deals

\textsuperscript{71} Soysal, Yasemin, N. (1994) Limits of Citizenship, p. 37. do you need joural details or place and publisher here?
\textsuperscript{72} Ibid., pp. 37-38.
\textsuperscript{73} Ibid., p. 38.
\textsuperscript{74} Ibid., p. 79.
essentially with socioeconomic and political policy developments in the 1980s and 1990s. Dorte Skot-Hansen investigates Denmark’s cultural policy towards immigrants in the cultural policy area per se. That is, the general cultural policy carried out by the Ministry of Culture regarding arts, the administration of cultural institutions such as theatres, museums and cinemas, and cultural values. She claims that Danish policy was assimilationist from 1970 to 2001. Her argument centres on the failure of the Ministry of Culture’s Cultural Development Fund established in the 1990s, to fund the cultural projects by immigrants. Tobias Harding investigates the same area of research studying the way Swedish policymakers sought to preserve the national culture between 1970 and 2002. The second by Nina Edström is only a review of Sweden’s cultural policy towards immigrants from the 1990s onwards.

The present literature review attests to the difficulty in dealing with the subject. That is, as Ulf Hedetoft pondered, how we can [using currently available literature] “understand the relationship between traditional divergence and a possibly greater actual convergence between Denmark and Sweden today.” However, as King et al. suggest:

The perceived complexity of a situation depends in part on how well we can simplify reality, and our capacity to simplify depends on whether we can simplify outcomes and explanatory variables in a coherent way … Thus ‘complexity’ is partly conditional on the state of our theory.

iii) Theoretical Frameworks

King et al. also write “[t]heories usually imply several more descriptive or causal hypotheses.” This section includes my research questions, arguments, and a description of the theoretical configuration which I explore in Chapter Two and apply throughout the study. The study introduces new empirical data and draws upon recent theoretical and methodological

81 Ibid., p. 19.
perspectives, in an attempt to deal with the complex reality described above. In doing so, it expands the scope of the theories selected and of the research literature in general.

**A) Research Questions**

I investigate two main questions derived from the two main axes of research identified in the literature review.

- The first question is: why did Sweden choose multiculturalism while Denmark maintained a policy of assimilation? It examines the process of birth (adoption) of the first Swedish multicultural policy and the absence of a similar outcome in Denmark.

- The second question is: what kinds of multiculturalism and assimilation Sweden and Denmark respectively applied and how were these implemented and continued?

Both research questions feed each other. To strengthen an argument about the source of a policy, one also needs to show how this policy was implemented and how it evolved over time. Conversely, one cannot ensure the validity and reliability of a policy whose evolution is examined, if its source is not properly established. What will tell us that we are studying the right object? With the exception of Lars-Erik Hansen’s research, most studies have addressed only one aspect of the question with respect to the policies: their birth or their evolution.

The study does not seek to examine which of the two states’ policies is better from a normative point of view or in dealing with ethnocultural diversity. It is mostly explanatory and is a contribution to the understanding of migration, one of the most pervasive issues of our times. However, it can be a useful tool of reference in the hands of policy analysts and policymakers in both countries, and beyond.

**B) Arguments**

This study makes new theoretical statements on two levels. Regarding policy adoption, I contend that ideas (independent variable)—in contrast to the impact of interest groups, the bureaucracy, party politics, globalization and the public opinion—were the primary factor of policy divergence. Divergence occurred in their cultural integration policies. In Denmark, they were embedded in a policy legacy, i.e. the 1953 agreement on cultural policy between the Danish Radical Liberal Party and the Social Democratic Party that aimed at preserving an inward-looking orientation. The Radical Liberal party, presenting itself as custodian of Grundtvig’s Christian and nationalist heritage, was the main enforcer of this orientation during the agreement. These ideas were radically opposed to multiculturalism and prevented its adoption in Denmark during the formulation of the White Paper 517 of 1969 (dependent variable). This is in contrast to the perspectives held by Claesson and Gerle, for whom the
mediating factors between Grundtvig’s ideology and Danish policy were respectively the existence of a peasants’ movement and a different church tradition, and Vind for whom it is Grundtvig’s ideology itself.

In Sweden, multiculturalism was primarily the result of Olof Palme’s ideas (independent variable), the former Minister of Culture, Prime Minister, and activist in the late 1960s. These ideas stemmed from his personal experience. This multiculturalism was embodied in a section on disadvantaged groups in Prop. 1974:28, the first national cultural policy (the dependent variable). I suggest that electoral and party politics as argued by Green-Pedersen and Krogstrup, Green-Pedersen and Odmalm, Karpantschof and Rydgren, explain the strengthening of Danish assimilation policy in the 1980s and 1990s rather than its source.

The study is expected to contribute new theoretical knowledge on (1) the currency of ideas as causal factors in their own right alongside institutional and power-interest factors; (2) the way ideas work, by confirming that they act either by guiding actors (agency) or by being embedded in structures (institutions).^8^2

Concerning the nature of these policies, I argue that Denmark’s assimilation policy amounts to a policy of toleration and Sweden’s multiculturalism seeks to celebrate difference. Tolerance refers to the dislike of ethnocultural diversity in favour of the national culture while it promotes the non-interference of the state in immigrants’ cultural practices unless these are harmful to the resident majority. This research is expected to broaden our understanding of tolerance in theoretical terms, and show its application across geographical areas. The celebration of difference is embodied in the beliefs that the well-being of immigrant groups depends on the existence of a cultural community of their own and that ethnocultural diversity is beneficial for the wider society in cultural terms. Like toleration, the celebration of difference is a uniformizing concept and would be broadly applicable. Regarding their policies’ evolution, I argue that Danish toleration and Swedish celebration of difference were implemented using mostly a ‘top-down’ approach, although one finds elements of a ‘bottom-up’ approach. These policies were kept as a result of path dependence namely negative feedback mechanism in Sweden, and a reactive sequence and negative feedback in Denmark.

Policy convergence took place in their socioeconomic and political integration policies. Concerning the form of their socioeconomic policies I argue, like Jørgensen, that both states

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essentially sought to ensure the employment of immigrants and their self-sufficiency (accumulation). However, unlike Jørgensen, I state that this policy orientation existed prior to the 1980s going as far back as the birth of their modern nation states. They consolidated existing social and political rights (legitimacy) through their focus on equality as claimed by Holm, Hvenegård-Lassen on Denmark and Hansen on Sweden, anti-discrimination policies and increased means of political participation. However, they did not award the right to vote in national elections to non-citizens. I argue that the impact of international human rights instruments and the pressure of LO, the labour union, as claimed by Hansen and Hammar about Sweden, explain this policy orientation. However, this development was set in motion well before going as far back as the second half of the 19th century. It was also impacted by national processes such as; the 1875 Agreement between Denmark and Sweden on the deportation of Swedish guest workers, the action of the Swedish civil rights activist, Eliel Löfgren, in the 1910s, the advent of social democratic parties with their welfare state projects in the late 1930s against summary deportation of immigrants, the horrors of the Holocaust, and the exclusion of Jewish refugees.

These socioeconomic integration policies followed a functionalist approach to implementation in both countries. Policymakers experimented with various regimes of incorporation. This seems logical given their focus on accumulation and legitimacy. Given their similarities and tradition of cooperation between Sweden and Denmark, the conclusions of the study are expected to illuminate similar comparative studies in Scandinavian and even other western countries. One of this study’s most interesting innovations is that it introduces states’ general cultural policies as a relevant field of investigation of their cultural policies towards immigrants.

Concerning the origins of the countries’ respective policies, I argue that policy divergence occurred in the cultural integration domain, whereas policy convergence took place in the socioeconomic and political integration domains. It is essential to clarify these concepts beforehand, because many of the problems mentioned in the existing literature stem from problems of concept differentiation. Accordingly, I divide the field of integration into three policy areas: socioeconomic, political and cultural.\(^3\) Such policy differentiation helps to

identify which of the integration policies produced by governments touched on cultural issues.\footnote{Ibid., pp. 101-106.}

The first is socioeconomic (market) and concerns the employment of immigrants and other material aspects such as housing and social welfare. The second is political (state) and refers on the one hand, to citizenship principles: \textit{jus sanguinis}, the acquisition of citizenship by descent, or \textit{jus soli}, the acquisition of citizenship by birth in the territory. On the other hand, it refers to the system of organisation or incorporation regime that governments put in place, such as camps for the reception of refugees, spatial dispersal and the various organizational designs described by Soysal and mentioned previously. To these two dimensions, one can add the political participation of immigrants, such as the right of permanent residents to vote. The third is cultural (nation) and deals with the beliefs and practices which immigrants bring with them and whether a government wants them to relinquish or preserve them and acts accordingly.\footnote{Ibid.}

I argue that the outcome of Danish cultural integration policy is the result of ideas embedded in a policy legacy, namely the 1953 agreement on culture between the Danish Radical Liberal Party and the Social Democratic Party which aimed at preserving an inward-looking cultural orientation. Swedish cultural integration policy is primarily the result of the actions and ideas of Olof Palme, the former Minister of Culture, Prime Minister and activist. As mentioned previously, some factors such as international civil rights movements, and a variation in the Lutheran church tradition are complementary. Others such as the influence of a far right party and a weaker right-wing block party may explain the strength of the movement itself rather than its origin.

Regarding the nature of these policies, I contend that Denmark’s assimilationism amounts to a policy of toleration and Sweden’s multiculturalism seeks to celebrate difference. Toleration refers to the dislike of ethnocultural diversity in favour of the national culture while it promotes the non-interference of the state in immigrants’ cultural practices unless these are harmful to the resident majority. The celebration of difference is embodied in the beliefs that the well-being of immigrants’ groups depends on the existence of a cultural community of their own and that ethnocultural diversity is beneficial for the wider society in cultural terms.

The Danish toleration and the Swedish celebration of difference were implemented using mostly a ‘top-down’ approach, although one finds elements of a ‘bottom-up’ approach. Unlike their cultural integration policies, both countries’ socioeconomic integration policies
followed a functionalist approach in both countries. They essentially sought to ensure the employment of immigrants and the consolidation of existing social rights through anti-discrimination policies. These policies were revised in the mid-1990s but their orientation was kept as a result of a negative feedback mechanism in Sweden, and a reactive sequence in Denmark. All these arguments are sustained by theoretical approaches.

C) Theoretical Approaches

Social scientists differ according to their ontological and epistemological leanings. Peter Howard describes three ideal types that vary according to the researcher’s attitude (negative or positive) to the presence of three principles: causality, context (influence of environmental factors) and essentialism (core principles). The first—neo-positivism—rejects context but accepts causality and essentialism. “The role of theory is to generate hypotheses, defined as statements positing a causal relationship between independent and dependent variables, and [to] test those hypotheses against objective, real-world evidence”.  

The second—interpretivism—refutes causality but agrees with essentialism and context. Howard writes that “[f]or the interpretivist, the goal of research is to uncover essential meanings of cultures, representations, or discourses... Each reading of the world is subjectively unique, depending on the position of the reader and the encounter.”

The third—relational—disagrees with essentialism but subscribes to causality and context. It “focuses on the specifics of causal processes and the intersubjective nature and importance of social context. The processes that form ‘things’ are indeed causal and produce an intersubjective understanding among those involved that can lead to particular outcomes in contingent situations.”

While most previous studies on policy adoption have adopted interpretivism through their use of the discourse analysis method, I pursue ideational and policy process-based theories as well as a mixed method (qualitative/quantitative), the Configurational Comparative Method. Therefore my study falls within the relational tradition. Contrary to an interpretivist perspective and more like a neo-positivist account, I minimize my own reading of the object of study and use variables and correlation (causal factors). However, unlike a scholar working from a neo-positivist corner, I do not seek to establish general laws and admit the existence of alternative causal paths. Like an interpretivist scholar, I give importance to context.

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87 Ibid., pp. 400-401.
88 Ibid., p. 401.
Lastly, rather than confining my analysis to one theoretical approach, I use “cascading theories” or combinations of approaches. However, I chose the best candidate by testing it against rival theories. The aim is to achieve greater explanatory power by adopting a methodological pluralism. Yet, all these approaches combined together form one single theoretical perspective.

The first group of theories deals with agenda setting. The most seminal approach is John W. Kingdon’s policy streams model. Kingdon argues that when three mechanisms or “streams” are in agreement the chance that a policy will enter a government’s agenda are “dramatically increased”. The first mechanism, the problem stream, requires that an issue be seen as a problem. The second mechanism, the politics stream, refers to a change of conditions in the political environment (government reshuffles, elections, etc.). The third mechanism, the policy stream, refers to the availability of a policy solution to the problem.\(^{89}\)

Three theories inform policy adoption. The first perspective is based on Erik Bleich’s model on gatekeepers that claims that some policymakers can individually decide the fate of a policy after it has climbed up the policy agenda. These gatekeepers act according to their own frames or “priors.” However, the way the policy process is structured also matters. If it is structured sequentially, the chance that a bill will overcome negative priors is extremely slim. But, if the process is structured spatially, policy entrepreneurs can knock on other doors and may eventually be successful.\(^{90}\) The second perspective stems from Sheri Berman’s notion of “carrier”. Berman’s notion is similar to Bleich’s, except that a “carrier”, as opposed to a “gatekeeper”, is mobile, pro-active and can take on the task of promoting a policy.\(^{91}\) The third perspective is derived from the work of Ellen M. Immergut on the policy process. Immergut claims that executive, parliamentary and electoral structures can affect policy outcome.\(^{92}\)

The second group of theories deals with policy continuity from the late 1960s and early 1970s to 2006. They explore the second research question about the nature and evolution of Danish and Swedish integration policies. In order to show that Danish assimilation arises from a policy of toleration, I primarily use two sources, David Miller’s liberal nationalism and the French republican model. Regarding the nature of Sweden’s multicultural policy, I explore the

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\(^{91}\) Ibid., p. 28.

theoretical works of Charles Taylor, Iris Marion Young and Bhikhu Parekh to demonstrate its attempt to celebrate difference.

I rely on the one hand, on path dependence theory to demonstrate the continuity of their cultural integration theories. Path dependence entails that once policymakers have chosen a policy path, these policies are likely to remain on this path as the consequence of various mechanisms namely the costs that one would incur for changing paths or the benefits that have already accrued. I do not apply path dependence to their socioeconomic and political integration policies therefore I argue that they reflect a functionalist approach with their emphasis on interest (employment and self-sufficiency) and human rights instruments. I use instead Bo Rothstein’s functionalist approach to implementation to prove this case. The theoretical perspective laid out above is complemented by the methodology below. Both form the explanatory framework that I apply to both cases.

iv) Methodology

Research methods are “the procedures and activities for selecting, collecting, organizing and analyzing data”\(^93\) in relation to the selected theories and hypotheses. They include the formation of concepts needed to gather data, the methods of gathering these data and the choice of case study.

A) Empirical Universals, a Middle Range Conceptualization

As mentioned in the literature review, the neglect which scholars have shown for concept formation is one of the factors which have hamstrung research development in the field. Peter Mair argues that we must start “by addressing the ‘what-is’ question; only later, if at all, do we address the ‘how-much’ question ... That is, we need to know what we are going to measure and compare ... [and] begin by getting the concepts right”.\(^94\) Blaikie indicates that concepts are “important in the theoretical framework that sets a context for the research, as being involved in the statement of the research problem, as determining the data that will be collected and how they will be categorized, and as being essential in describing the findings”.\(^95\)

Thus while the work of concept formation may seem a secondary or even optional task, it is in reality as important as the other components of social science inquiry.

One of the negative consequences of this neglect is the “travelling problem” or the “ladder of generality” identified in the early 1970s and 1980s by Giovanni Sartori. It is a situation whereby concepts’ meanings, or “intentions”, are stretched into “vague, amorphous conceptualizations” as authors attempt to apply them outside their original settings or “extensions”. While some researchers have argued that this “conceptual stretching” simply arises from efforts to make conceptualizations “value-free” or universally applicable, useful middle range conceptualisations, such as Sartori’s “empirical universals”, have been available since the mid-1980s.

Sartori defines empirical universals as “‘universal’ categories - concepts which are applicable to any time and place ... [but which] somehow are amenable, in spite of their all-embracing, very abstract nature, to empirical testing”. Empirical universals are middle range in both abstraction and categorization. They are neither too broad, nor too narrow, and it is left to the researcher to “manoeuvre, both upwards and downwards, along a ladder of abstraction in such a way as to bring together assimilation and differentiation, a relatively high explanatory power and a relatively precise descriptive content, macro-theory, and empirical testing”.

Furthermore, Sartori recommends that one distinguishes “the defining properties (or necessary characteristics) from the accompanying properties (contingent or accidental characteristics)”. Defining properties are characteristics without which a concept will be meaningless or inconsistent. Accompanying properties are those whose absence does not undermine the definition of the concept. He adds:

To illustrate, if the ability to fly were considered a defining property of birds, then an ostrich could not be classified as a bird. As a consequence, either we unsettle (resettle differently) the criteria according to which zoologists classify all living beings, or we must make ‘ability to fly’ an accidental, if very frequent, property.

The purpose for which one wants to use the concepts is equally important. Two traditions are available for this task. The first, the sensitizing tradition, suggests that theory

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98 Ibid., p. 37.
99 Ibid., p. 126.
100 The word “consequences” is verbatim.
101 Ibid., p. 126.
building informs conceptualization. One starts with very basic concepts and retools them to fit theoretical developments. A variant of this school, the hermeneutic tradition, adopts as its starting point, the concepts used by actors themselves and not researchers. The sensitizing tradition also seeks to strike a balance between theory and empiricism. Rather than a “top-down” approach, with the researcher framing the concepts herself or himself, the sensitizing tradition is ‘bottom-up’. The second, the operationalizing tradition, “is concerned with turning concepts into variables or conditions, with identifying the key concepts to be used in particular study, and then defining them and developing ways of measuring them”.

As described above, I use the operationalizing tradition to find the defining characteristics of Danish assimilationist and Swedish multicultural policies. I draw upon a number of theories of assimilation and multiculturalism to show that the Danish policy amounted to toleration and the Swedish policy to the celebration of difference. The operationalizing tradition is also used in the study of policy adoption to the extent that toleration and the celebration of difference represent outcome variables as detailed in the study of the Configurational Comparative Method (CCM) below.

B) The Configurational Comparative Method

My tool of enquiry is the Configurational Comparative Method of Charles Ragin and Benoit Rihoux. It is a comparative-historical method and one of the most recent innovations in the field. It differs from interpretive methods based on discourse analysis and rational choice analysis that emphasize the maximization of interests to the extent that it is “characterized by the use of systematic comparison and the analysis of process over time to explain large-scale outcomes such as revolutions, political regimes, and welfare states.” It cuts across main methodological traditions: the case study, the comparative method, the statistical method, but not the experimental method. The latter, which is common in the applied sciences, seeks to

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102 Ibid., pp. 118-119.
103 Ibid., p. 120.
104 Ibid., p. 115.
examine the validity of a hypothesis through repeated and proven experiment on stimulus and controlled groups. It has, as such, little use in political science.\(^{107}\)

The case study is the comprehensive study of a unit of observation. In that sense, it is said to be essentially qualitative. It is often described as (1) limited to generating hypothesis in the early stages of a study, (2) hardly theoretical, (3) difficult to apply to other cases, (4) prone to “confirm the researcher’s preconceived notions” and (5) contributing little to general theory-building.\(^{108}\) However, Flybjerg argues that these are “misunderstandings”. He states, citing the findings of Galileo Galilei, Isaac Newton, Albert Einstein, Niels Bohr, Charles Darwin, Karl Marx and Sigmund Freud, that a single “critical” case can be as theoretical informative as multiple cases\(^{109}\) and generate more than hypothesis\(^{110}\), therefore it can be generalized through falsification.\(^{111}\) Furthermore the case study, according to him, “is well-suited for identifying ‘Black swans’ because of its in-depth approach: What appears to be “white” often turns out on closer examination to be ‘white.’”\(^{112}\) Lastly, the tendency to confirm own preconceived notions is common to all methods but the advantage of the case study is that it can ‘close-in’ on real life situations and test views directly in relation to phenomena as they unfold in practice.\(^{113}\)

The statistical method seeks to study the entire universe of cases often by means of correlations. The comparative method in contrast focuses on a small number of cases. The number of cases, as Arend Lijphart writes, is the fundamental difference between the two methods.\(^{114}\) The criticism often levied against the statistical method is that the greater the number of cases, the less reliable and valid it becomes because of “conceptual stretching” and “Galton’s problem”, which arises when policy diffusion is taken for causation. A large number also makes it more difficult to differentiate between the two occurrences. The comparative method in contrast allows the researcher “to notice immediately any trace of, for instance, ‘Galton’s problem.’” As Charles Ragin writes, “Comparison lies at the heart of human reasoning and is always there in the observation of the world”.\(^{115}\) Bovenkerk et al. attest that, in general, the comparative method suits particularly well the field of immigration, although only

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\(^{109}\) Ibid., p. 226.

\(^{110}\) Ibid., p. 229.

\(^{111}\) Ibid., pp. 227-228.

\(^{112}\) Ibid., p. 228.

\(^{113}\) Ibid., pp. 234-235.


a small group of studies in the field are cross-national comparisons.\textsuperscript{116} Caroline B. Brettell and James F. Hollifield explain that “while the case study is commonly used in all of the social sciences, much of the most important and path breaking work on migration has taken the form of systematic comparison, often with very sophisticated research designs using comparative method as a way of testing hypotheses and building theories”.\textsuperscript{117}

Nancy Foner declares that a comparative approach opens new horizons and highlights aspects which might have gone under the radar.\textsuperscript{118} Comparisons across times and places help us to see which issues, problems and policy contents are recurrent or not (e.g. refugees, economic migration, employment, racism, xenophobia, security and guest workers). They also prompt us to examine the theories themselves and identify which of them are “space-bound” and which are “time-bound”. “Space-bound” theories are more appropriate to certain countries due to their particular economic, sociopolitical and geographic circumstances, whereas “time-bound” theories can be applied to contemporary issues in migration as well as to early issues or vice-versa.\textsuperscript{119} Nonetheless the comparative method or more accurately, the “focused comparisons” method, has sustained its share of criticism. It is criticized for overstating the difference between cases, providing only “partial generalizations” and being unable to yield “pure” comparative cases.\textsuperscript{120} Indeed, Lijphart concedes that the suitability of focus comparisons may depend on the object of enquiry.\textsuperscript{121} In the early 2000s, new studies emerged seeking to overcome each method’s weakness and solve complex cases by bridging qualitative and quantitative methods.\textsuperscript{122}

Among these approaches, the Configurational Comparative Method (CCM), introduced by Charles Ragin and advocated by authors such as James Mahoney, Alexander L. George and Andrew Bennett, has been one of the most fruitful.\textsuperscript{123} The CCM predicates that

\begin{footnotesize}
\textsuperscript{116} Bovenkerk, Frank; Miles, Robert, and Verbunt, Gilles (1990) “Racism, Migration and the State in Western Europe: A case for Comparative Analysis”, \textit{International Sociology}, Vol. 5, No 4, pp. 475- 490.
\textsuperscript{119} Ibid.
\textsuperscript{120} Ibid., pp. 172-173.
\textsuperscript{121} Ibid., p.173.
\end{footnotesize}
cases are transformed into configurations. That is “a given combination of conditions associated with a given outcome.” These conditions can be “stimuli, causal variables, ingredients, [or] determinants ...”

CCM groups four techniques: Qualitative Comparative Analysis using crisp sets (csQCA), Multi-value QCA (mvQCA), fuzzy-set QCA (fsQCA) and MSDO/MDSO (most similar, different outcome/most different, same outcome).

In this context, MSDO/MDSO refers only to the selection of cases and does not extend to finding the crucial variable, the factor which among concurrent factors cannot be held constant or controlled. MSDO and MDSO are improved models of the method of agreement and the method of difference first proposed by John Stuart Mill and refined by Adam Przeworski and Henry Teune in the 1970s. The most different system requires that cases be as different as possible, but with a similar outcome (dependent variable). The most similar system entails that cases be as similar as possible, with a different outcome. The most similar system is more appropriate to this study because the two countries examined have a very similar background, but divergent policies. It also has many advantages over its sister method.

This partly explains why I chose to compare Sweden and Denmark rather than Sweden and Norway whose integration policies are assumed to be similar; although no comparative study has as yet been undertaken. The fsQCA differs from csQCA and mvQCA in its focus on the quantity of a value (more or less of a condition) rather than the combinatorial multiplicity of conditions with each other. It an attempt to prove that these conditions can be deterministic;

125 Ibid., p. xix.
126 Abbreviations QCA and csQCA are used interchangeably by the authors.
127 Ibid., p. 11.
they are measured and assigned importance (sufficient or necessary) given their probabilistic value (Bayesian). The essential difference between csQCA and mvQCA is that the latter uses many variables (multichotomies) rather than the binary 1 (presence) and 0 (absence). An example is $A0B0 + A0B1 + A0B2 \rightarrow O$ where $A$ is a dichotomous condition and $B$ is a “three-valued condition”. The mvQCA simply requires an effort of synthesization of conditions: “minimization”.

csQCA is my technique of choice together with MSDO. Although my first hypothesis regarding the origins of Danish and Swedish ethnocultural diversity policy relies on multiple causations, its intervening conditions are made up of dichotomies and do not require the use of more complex combinations such as mvQCA requires. As Ragin and Rihoux write, QCA is better suited for the use of medium range theories and can “lay the groundwork and be extended to even more demanding types of analyses for taking into account the temporal dimension and the various “paths”, “critical junctures”, and overall dynamics that can be found in systematic comparative historical studies”. However it is applied only to the adoption process of Swedish multicultural policy, Prop 1974: 28 not its implementation in the decades that followed.

Ragin and Rihoux observe that csQCA has three main characteristics. The first is that “the choice of the variables (conditions and outcome) for the analysis must be theoretically informed. Theory points at useful conditions to be included in the model and helps to operationalize them (how to measure their intensity, which thresholds to use, etc.).” It is the typolgetical theory. In the present study, this means that in each case, the problem, policy and policy spheres form a condition ABC, the gatekeeper amounts to condition D, and party majority and discipline equal condition EF. The second is the use of Boolean language in theoretical iterations, e.g. a truth table where 1 marks the presence of a factor and 0 its absence.

Lastly, causality in csQCA is associated with “Multiple Conjunctural Causation” (MCC) not a single factor. MCC means that “several causes can be simultaneously present (or be combined somehow) constituting a “causal combination,” for the outcome to occur”

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Furthermore, it accepts that “several different combinations of conditions may produce the same outcome \((AB + CD \rightarrow Y)\), + indicates a Boolean or).” Therefore, even the absence of a condition “a” in a combination may lead to the same outcome:

\[ (AB \rightarrow Y \text{ but also } C \rightarrow Y). \]

This means that some conditions may be sufficient but not necessary. Thus, while I argue that Olof Palme and ideas stemming from a policy legacy are the primary factors of explanation respectively, they are not exclusive.

To illustrate, in the case of Sweden where all the conditions were present, the configuration looks as follows:

\[ A^1B^1C^1 + D^1 + E^1F^1 \rightarrow Y \]

But the outcome could have been attained with other conditions, through a different path. In the case of Sweden, it could have been attained with even fewer conditions.

\[ D^1 + E^1F^1 \rightarrow Y \text{ or } E^1F^1 \rightarrow Y \]

This latter configuration is necessary, whereas all others are sufficient. Causality is established through causal inference. It entails, as King et al. write, that we “demonstrate the causal status of each potential linkage in such a posited mechanism... define and then estimate the causal effect underlying it”. The CCM utilize two main procedures: correlational logic and process-tracing to establish causality. These procedures are respectively at the core of the statistical method and the case study. Correlational logic establishes the cause of the outcome by comparing conditions “side-by-side”. In contrast, process-tracing “attempts to identify the intervening causal process - the causal chain and causal mechanism - between an independent variable (or variables) and the outcome of the dependent variable”. For these reasons, the logic of correlation and the logic of process-tracing are often referred to, respectively, as “across case” and “within case” analysis.

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135 Ibid., p. 8.
136 Ibid.
137 Ibid.
138 A sufficient condition is one which is always present when an outcome occurs, although the outcome may occur irrespective of its presence. A necessary condition is one without which an outcome cannot occur. Ibid., p. 11.
144 Ibid.
Each procedure has its advantages and disadvantages as mentioned previously when describing the statistical and the case study. Their dual use is meant to remedy each method’s weakness.\textsuperscript{145} The logic of correlation gives “confidence” through its “connections” of the causal relationships which are purported to exist. However, it provides only relative certainty because of the limited number of cases.\textsuperscript{146} It is also insensitive to complexity and historical details. Process-tracing is criticized for being similar to historical narrative and, therefore, non-scientific.

George and Bennett argue that “both within-case and across-case analyses are important for advancing theory testing and theory development. The two methods provide different and complementary bases for causal inference”\textsuperscript{147}. To illustrate, Thomas R. Dye explains that:

finding a high correlation between cigarette smoking and the incidence of cancer among human systems is important. But this correlation does not in itself reveal the functioning of cells within the human body: we still want to know how cancers are formed and how they behave.\textsuperscript{148}

Lastly, one can relieve process-tracing of the charge of being ahistorical by using empirical universals as I do in this research. That is, as Sydney Tarrow writes “[by] converting a purely historical account that implies or asserts a causal sequence into an analytical explanation couched in theoretical variables that have been identified in the research design”.\textsuperscript{149}

I use both the logic of correlation and the logic of process-tracing to infer causality in my examination of the origins of Denmark’s and Sweden’s cultural integration policies. I also use process-tracing to study the maintenance of their policies as I argue that their policies were maintained until 2006. Bennett and Elman affirm that process-tracing is particularly well suited for the study of path dependence. It is valuable for understanding interactions among variables during a contingent period, that is, a period when the causal variable is influenced by a new

\textsuperscript{145} Ibid.

\textsuperscript{146} Ibid., p. 239.

\textsuperscript{147} Ibid.


\textsuperscript{149} Tarrow, Sydney (2010) “The Strategy of Paired Comparison: Toward a Theory of Practice”, p. 239.
factor (or factors). Contingency as I demonstrate in Chapter Two is an important factor in path dependence.\textsuperscript{150}

George and Bennett distinguish four variants of process-tracing. The first variant, “detailed narrative” is an in-depth but atheoretical account of the causal mechanisms of an event.\textsuperscript{151} The second variant, “the use of hypotheses and generalizations”, like detailed narrative, is atheoretical and may seek generalizations or an established pattern. However, it is sustained by one or many hypotheses. This variant is appropriate for showing policy continuity in socioeconomic integration policies and in the two countries’ cultural integration policies. The third variant, “analytic explanation”, is “couches in explicit theoretical terms. The explanation may be deliberately selective, focusing on what are thought to be particularly important parts of an adequate or parsimonious explanation; or the partial character of the explanation may reflect the investigator’s inability to specify or theoretically ground all steps in a hypothesized process or to find data to document every step”.\textsuperscript{152}

Indeed, analytic explanation is suitable for examining the origins of the two countries’ cultural integration policies. First, I use variables drawn from theories of agenda setting, policy making and decision making and incorporated in the Configurational Comparative Method. Second, it provides me some degree of parsimony in the examination of the policy processes mentioned above. I use analytic explanation to study the passage of Sweden’s first national cultural policy in 1974 in the Riksdag, but when I examine the government’s formulation of the same bill, I eschew analytic explanation in favour of the fourth variant, “[m]ore general explanation.” The latter is situated at a higher level of abstraction. I eschew a detailed account “because the data or theory and laws necessary for a detailed explanation are lacking or because an explanation couched at a higher level of generality and abstraction is preferred for the research objective”.\textsuperscript{153}

C) Limits of the Study

As King et al. point out, “Every researcher or team of researchers labors under limitations of knowledge and insight, and mistakes are unavoidable”.\textsuperscript{154} This research project is not an exception. First, although the period of study appears large, the research does not, in the

\begin{footnotesize}
\begin{enumerate}
\item See the section on path dependence in Chapter Two. The term “path dependency” is used interchangeably with “path dependence” or “path-dependence” in the general literature. I use path dependence unless I reproduce a term by another author.
\item Ibid., p.211.
\item Ibid.
\end{enumerate}
\end{footnotesize}
words of Tarrow, “[exhaust] all potential variables of interest”.155 As mentioned previously, the Configurational Comparative Method requires the presence of equifinality (differential causal factors) and multifinality (differential outcomes). Likewise, this research focuses on only one subfield of migration (integration) at the expense of immigration.156 The academic literature on the interplay between immigration policy and integration policy is embryonic. Consequently, there is no firm knowledge on the ways in which immigration policy impacts on integration policy and vice-versa.

It is also difficult to deal with “the trade-off between theoretical neatness and complexity of explanation”.157 The basic method of difference may be seen as more reliable than the more complex Configurational Comparative Method. As Christina Boswell points out, ‘Proper’ science demands that we break down our explanation into observable (and if possible measurable) variables which conform to generalizable laws. Once we try to incorporate the role of ideas or institutions, however, we will have to sacrifice this type of theoretical transparency.158

Lastly, infinite regress is often invoked in process-tracing and studies which involve ideas. Infinite regress is said to occur when a causal factor CX relies on a causal factor CY which in turn relies on a causal factor CZ ... indefinitely.159 However, as Bennett writes:

there are pragmatic limits on how much detail a researcher will go into and how continuous an explanation they will seek. These pragmatic limits include the resources available to the researcher, the importance the researcher places on establishing an explanation of the case with a specified degree of confidence, and the rapidity with which the evidence converges in support of a particular explanation.160

This description agrees with the circumstances of this study. Evidence converged so much so that it was not necessary to delve into minute details. In addition, as Bleich explains, while Kingdon:

warns against the dangers of infinite regress in tracing the well-spring of ideas. It is possible to strike a balance... by explaining policy outcomes with reference to frames, and then by exploring the most significant and proximate causes of those
frames... it serves to unveil the origins of ideas without getting lost in their history.\textsuperscript{161}

v) Sources

The present study is based on primary and secondary documentary sources and interviews with policymakers and experts. In the course of the past five years,\textsuperscript{162} I have interviewed key policymakers associated with the elaboration of Danish and Swedish cultural integration policies. As primary sources, I have examined the main policy documents produced by policymakers during parliamentary debates and parliamentary and government enquiries. For the collection of empirical data, I conducted interviews via telephone, email and in person with key policymakers and experts in Sweden and Denmark.

These include officials in the Ministries in charge of Integration, Immigration and Refugee Affairs in both countries; researchers at think tanks; and journalists and parliamentarians involved in cultural and immigration matters. For secondary sources, I consulted memoirs, books, textbooks, archives and publications. I also examined newspaper articles in both print and audio-visual formats from academic, institutional and public libraries in order to interpret or re-interpret historical and empirical work.

vi) Plan

Chapter One uses the methodology on middle range concepts to map out the policy models of assimilation and multiculturalism. It examines, on the one hand, the assimilation model of the French melting-pot, and David Miller's liberal nationalism, and shows how they both adhere to a principle of political toleration. On the other hand, it reviews the thoughts of three influential multiculturalist theorists - Charles Taylor, Iris Marion Young and Bhikhu Parekh - and shows that their common ground is the celebration of difference.

Chapter Two examines three theories of policy change including John W. Kingdon’s model on policy streams,\textsuperscript{163} Sheri Berman’s and Erik Bleich’s respective approaches on agents, and Ellen M. Immergut’s perspective on party majority and party discipline in policy making.\textsuperscript{164} Each approach is transformed into a condition or variable which is then applied in

\textsuperscript{162} This includes interviews I conducted in 2006 for the purposes of my Master’s degree dissertation.
Chapter Five. The chapter then explores theories of policy implementation, including Jeffrey L. Pressman and Aaron Wildavsky’s ‘top-down’ approach, Michael Lipsky’s ‘bottom-up’ approach and Bo Rothstein’s and Christina Boswell’s functionalist approaches. In the end, all these theoretical perspectives are fed into a truth table which is applied in Chapter Five. Lastly, it underpins path dependence, the mechanism of policy reproduction, in theoretical terms.

Chapter Three uses “a general narrative” to show that both countries had the same background in terms of integration policy prior to the introduction of multiculturalism in Sweden. It retraces the way immigrants were treated historically from the installation of the first regulation policies in the mid-19th century to the arrival of post-war immigrants. It shows that Denmark and Sweden had awarded the same body of socioeconomic rights to immigrants by 1960. Yet the economic participation of immigrants, and their capacity to sustain themselves economically, remained crucial points. Immigrants were given no political rights. None of the countries, however, had a formal cultural integration policy toward immigrants although one can discern clear policy currents, and assimilation was the default policy.

Chapter Four uses path dependence theory together with hypothesis and generalization as means of policy-tracing to show similarities in the socioeconomic and political aspects of the two countries' integration policies. It demonstrates that both countries put an equally strong emphasis on the participation of immigrants in the job market and equal rights. Immigrants’ employment was seen as essential for the safeguard of the welfare state. However, from the 1990s onwards, while the Danish State introduced regulations which put the onus on immigrants, the Swedish State turned toward employers. Equal rights, notably anti-discrimination laws, were considered both a democratic requirement and a means of enhancing immigrants’ access to the labour market. Permanent residents acquired the right to take part in local elections after three years of residency in the country but not in the national elections.

Chapter Five uses the historical analysis form of process-tracing to explaining why and how multiculturalism took root in Sweden as opposed to Denmark. It applies the set of causal conditions defined in Chapter Two with the help of the Configurational Comparative Method described in the introduction. It shows that in Sweden, as opposed to Denmark, all the three necessary conditions were present for such an outcome. The issue led to an acrimonious debate among proponents and opponents of the adoption of multiculturalism. There was a change in the political environment and, finally, a policy was available. In Denmark, the issue was not debated. Then, it reveals that at the “choice-point”, the structure of decision-making in the two

countries was aligned sequentially although there was only one gatekeeper in Denmark and many in Sweden. However, multiculturalism was adopted in Sweden specifically because of the favourable priors held by Olof Palme and his influence on fellow party members.

Chapter Six shows that Danish policymakers have provided little support for immigrants’ cultures. First, they refused to give them a space in the public sphere, and later, they promoted a strong Danish national culture. However, Danish policymakers have never resorted to the use of force to compel immigrants to adopt the majority culture or abandon theirs, even with the presence of the Far Right Danish People's Party in the government. I show that this is in line with a policy of toleration which entails that the one who tolerates is more powerful than the one who is tolerated but refrains from interference and using force. I also show that Swedish cultural integration policy amounts to a celebration of difference, where it is considered the state’s role to help preserve immigrants’ cultures. Furthermore, ethnic diversity is considered beneficial not only in cultural terms, but also in democratic and commercial terms.

The conclusion first presents a summary of the dissertation’s findings on change and continuity in Denmark’s and Sweden’s integration policies. Then, it makes new observations on epistemological and policymaking levels.

Cases are treated “together” but successively throughout the text for better understanding and legibility. Danish and Swedish institutions’ names and documents titles are in italic. Documents, in addition, are in inverted commas in order to differentiate them from institutions. These names and titles are followed or preceded by an English translation when necessary. The translations are mine where none was already available in English. However, they were reviewed by professional translators. The bibliography includes all the works cited. It is divided into four sections: official documents; books, articles and other documents; multimedia; and finally interviews.
Chapter 1: Mapping Assimilation and Multiculturalism in Theoretical Terms: Toleration and the Celebration of Difference

The “politics of incorporation” examines the sociopolitical and cultural integration of immigrants into the society and their relationship with issues such as citizenship and national identity. Assimilation and multiculturalism are the two most recurrent theories. However, whereas assimilation has been the “default” or natural model of incorporation for liberal democratic states, multiculturalism developed only in the mid-1960s and 1970s as a response to the Canadian government response to grievances put forth by nationalists from Quebec and changes in immigration laws in Australia. Assimilation is also the object of enormous contention among political scientists. Assimilationists support a uniform culture based on the culture of the majority within a state. However, there are different strands of assimilation.

Enforced assimilation, as practised in the early days of European colonization, compelled indigenous peoples to abandon their cultures and adopt that of the dominant group. This often meant that they were treated as second class citizens. With respect to immigrants, the dominant policy in the post-war era was non-coercive assimilation. This chapter identifies two forms of non-coercive assimilation: republicanism, which has a history extending back to

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the French Revolution,\textsuperscript{168} and liberal nationalism, which has recently emerged as an important strand in contemporary political theory. Its most influential contemporary representative, David Miller, proposes a model of “nationality” that promotes a common culture but accepts the existence of other cultural practices as long as they are kept in the private sphere. In other words, it is a regime of toleration.

Advocates of multiculturalism criticise assimilation for being hegemonic, compelling minorities to adopt another identity. They deny the existence of separate public and private spheres, and the possibility for equal individual rights to provide equal opportunities. They instead promote the \textit{recognition of all cultural identities} within a territorial unit and some form of collective rights. Multiculturalists such as Charles Taylor - one of their most famous spokespersons \textsuperscript{169} Iris Marion Young, and Bhikhu Parekh seek to redress the prevailing socioeconomic order, which they deem disadvantageous to ethnic and cultural minorities through programmes of affirmative action and stronger redistributive schemes.

This chapter argues that central to assimilation and multiculturalism are—respectively—the notions of toleration and the celebration of difference. Toleration is adopted by a state when it refuses to interfere in immigrants’ cultural practices as long as they do not harm the larger society. A desire to celebrate difference by contrast, stems from the belief that the existence of a vibrant immigrant culture is essential for the well-being of immigrants, and the idea that diversity is enriching.

The first section of this chapter examines the model of assimilation and outlines the differences between the French model of the melting pot and David Miller’s liberal nationalism then shows how the latter embodies the idea of toleration. The second section analyses Charles Taylor’s politics of recognition, Iris Marion Young “politics of difference”, Bhikhu Parekh’s “universalistic pluralism” and shows how they seek to celebrate difference.

1.1 Theories of Assimilation

Enforced assimilation is the earliest and most radical form of assimilation. It was the goal of many European states’ cultural policy during early colonial times, e.g. with respect to Native Americans in the USA, Aboriginals in Australia, First Nations in Canada, and Māori in New Zealand, as well as to such national minorities as the Saami in Sweden and the Inuit in Denmark. Indigenous cultures were deemed abhorrent and inferior so it was felt they had to be uprooted and re-moulded in order to benefit from the so-called more advanced and civilized European and Christian cultures.

In the French colonies and territories in Asia, Africa and the Caribbean, for example, the policy was applied with such consistency that local populations were taught that their ancestors were Gauls. Between 1860 and 1960, 200 to 400 of every 1000 Australian and Canadian aboriginal children, the so-called “stolen generation”, were removed from their parents and placed in white (European) foster homes compared to only 10 to 20 of every 1000 non-aboriginal children. According to James Jupp, “Indigenous peoples have suffered the most repression and forcible deculturation of any of the ethnic groups in the four countries [Canada, Australia, Great Britain and Sweden]”. With independence in colonial territories and the end of white-only immigration policies, enforced assimilation was abandoned.

1.1.1 French Republicanism

The French republican form of assimilation is based on the concept of the melting pot, the idea of developing a single national culture by blending all particularisms into a single national identity. Historian Jules Michelet (1798-1874), the instigator of the policy in the wake of the French revolution of 1789, conceived and propagated the notion of France as a

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172 Ibid., p.190. See also Noiriel, Gérard (1999) “Immigration and National Memory in Current French Historiography” in Marschalk, Peter (ed.) IMIS-Beiträge, Heft 10, January, p. 44. Francis Bebey and Felag, respectively, from Cameroon (Eastern) and Algeria, two countries once under the French colonial administration, have derided this notion in their writings. For an analysis, see Gross, Janice (2005) “Revisiting ‘Nos Ancêtres les Gaulois’: Scripting and Postscripting Francophone Identity”, The French Review, Vol. 78, No 5.
175 Noiriel, Gérard (1999) Immigration and National Memory, p. 44.
melting pot where all the French sub-national identities would melt into a single French cultural identity.\textsuperscript{176}

Many scholars believe this process of assimilation takes three generations to be completed. The first generation is hardly impacted by the dominant culture. The second undergoes a transformation but remains influenced by the parents’ culture, and the third generation is completely assimilated.\textsuperscript{177} Although minorities were not directly coerced into adopting the national culture as with enforced assimilation, pressure was put on them to give up their cultures. To use Victor Nee and Richard Alba’s expression, there were different and changing “mechanisms of assimilation.”\textsuperscript{178}

Initially, the mechanism of assimilation was \textit{the nation itself} conceived by Michelet in his \textit{Tableaux} (1833) as “a nourishing and assimilating land.”\textsuperscript{179} Michelet claimed that the physical geography of France shaped the identity of its people.\textsuperscript{180} As Pierre Vidal de la Blache, an eminent geographer, who followed in his footsteps explained: “For the German, Germany is above all an ethnic idea. What the Frenchman sees in France, as his homesickness shows when he is away, is the bounty of the earth and the pleasure of living on it.”\textsuperscript{181} But since the advent of the Third Republic in 1870, the French state has been the agent of cultural reproduction through four main mechanisms: public education, the French language, the army and centralization.\textsuperscript{182}

The first mechanism was \textit{public education}. Since the promulgation of the Jules Ferry Laws of 1883, public education has had the task of inculcating republican values such as citizenship and patriotism through a “national administrative frame.”\textsuperscript{183} It did this horizontally through the establishment of free and compulsory schools and vertically through state control over the school curriculum and its secularization. Jules Ferry (1832-1893), a prominent Education Minister and one of the main advocates of French colonial expansion, was one of its most fervent implementers. He imposed pedagogical guidelines to teachers in his \textit{“Lettres aux

\begin{thebibliography}{99}
\bibitem{176} Ibid.
\end{thebibliography}
He also enacted a ban on religious education in the public school system and made the patriotic books of historian Ernest Lavisse required reading for about 15 million French children between 1880 and 1914.

The second mechanism of assimilation was the French language. Since the post-revolutionary days, the French language has been used as an instrument of homogenization and republican propaganda. The Jacobins declared that “Speech must be one like the republic.” The Ferry laws imposed the use of French to the detriment of patois, a pejorative term used to describe non-Parisian French and regional languages such as Auvergnat, speakers of German and Dutch in the north, Celtic in the west, Basque in the south-west, Catalan in the south-east, Occitan in the south, Provençal in the south and Corsican in Corsica. Emmanuel Le Roy Ladurie describes it as a barter relationship: regional speakers, the “linguistic periphery,” gave up their languages in order to receive the gift of the French identity with accrued benefits such as political participation, enlightenment and education. Today, the linguistic periphery is almost defunct except for some pockets of resistance in Brittany, the Basque country and Corsica.

Interestingly, this defence of the national culture has taken an international and defensive dimension. Government action in recent decades has revolved around the defence of French in the face of the “invasion” of English. Thus, in 1992, French was entrenched in the constitution as the language of the republic. In 1994, the Toubon Law was passed mandating the use of French in sectors seen particularly at risk such as computing and marketing. In a revealing twist, in 1992, the country ratified the European Charter for Regional or Minority languages but when it was revealed later that the Charter could also allow the use of local languages in the public service it was struck down both by the State Council, the highest administrative court, and the Constitutional Council.

187 This list is non-exhaustive. Ladurie Le Roy, Emmanuel (1997) L’Historien, le Chiffre et le Texte, p. 487.
188 Ibid., p. 492.
190 Ibid.
France has also become the standard-bearer of the fight against the “advent of monoculture”, that is, Americanization. During the GATT (General Agreement on Tariffs and Trades) negotiations in 1999, Catherine Trautmann, then Minister for Culture and Communication, rallied her European peers around the defence of the “cultural exception.” The notion that cultural goods are different from others because they represent linguistic and cultural identities which should be safeguarded from the threat of uniformization brought about the liberalization of trade rules.\(^{191}\) Thus, assimilationists would not only seek to impose a national culture within the state but would also seek to promote this culture abroad and preserve the state from the encroachment of foreign languages.

The third mechanism was military service, established in 1798 by the Jourdan Law. Together with republican schooling, military service is credited with turning peasants into Frenchmen.\(^{192}\) Rogers Brubaker writes that “[they] reinforced each other: The school inculcated military virtues; the army taught language, literacy, and citizenship.”\(^{193}\) Citizenship designates the political status of individuals as well as a particular quality of a political system. As a normative concept, citizenship is a set of rights, exercised by the individuals who hold the rights, equal for all citizens, and universally distributed within a political community, as well as there being a corresponding set of institutions guaranteeing these rights.\(^{194}\)

The same assimilationist impulse motivated the extension of military service to foreign residents in 1889. It was feared that, if left out, foreign residents might develop parochial relationships and not show positive feelings toward France.\(^{195}\) By mobilizing millions of people out of their place of residence, the army was a locus where people from different cultural and socioeconomic backgrounds would mix and develop a common sense of belonging.\(^{196}\) Thus when President Jacques Chirac took the decision in 1996, as part of a large restructuring of the army, to suspend conscription after many centuries of existence, the issue turned into a virulent controversy.

Opponents of the decision argued that the army had functioned as a melting pot and had instilled civic education as well as other skills, while proponents insisted that that function


\(^{195}\) Ibid.

could be accomplished by other institutions. Yet in November 2005, following riots in the suburbs of Paris by youth of Arab and Sub-Saharan Africa backgrounds, a voluntary national service lasting between 6 and 12 months was instituted together with the creation of ANCSEC (National Agency for Social Cohesion and Equal Opportunities) to provide these youths with training and employment opportunities as well as to inculcate republican values.

The fourth mechanism, centralized government, is based on the “département” (department); an administrative unit which was created in the wake of the French Revolution as the centerpiece of a new system of centralization. Unlike the former centralized system which was absolutist and in the service of the King from the Middle Ages, the locus of the “département” was different. It was meant to reduce inequalities between the regions of France. In particular, it focused on the fracture that existed between “the two Frances”, the richer north and the poorer south, divided along the Saint-Malo-Geneva line, and between Parisians and the province (the rest of the country) that was viewed by the former as so backward that it was called “a country of savages.”

As Gérard Noiriel has affirmed, “passion for politics and human rights” are two crucial factors in the French model. The revolutionaries of 1789 promulgated equal access to citizenship for all, no matter one’s origins. This is evidenced in the motto of the young republic: “liberty, equality and fraternity” and the tenets of its Universal Declaration of the Rights of Man and the Citizen. As Ernest Renan contended in his famous speech “What is a nation?”, nationhood lies in the collective will of the people, that is, in the abstract idea of citizenship and not in an organic, cultural, linguistic, or racial community as the German

204 On 21 December 1790, the French Revolutionary Assembly consecrated a monument to him.
model of nationhood professes.\textsuperscript{206}

It was also thought that the state itself ought to be “laïc” or secular. As such, although the overwhelming majority of French citizens are Catholic, the country does not give any official or public status to the Catholic Church,\textsuperscript{207} in contrast to England where the Anglican Church is still the state church and the monarch must be Anglican. For the same reason, France has always refused to keep any statistics on ethnicity, race or religion, a fact that has hampered research on French immigration.\textsuperscript{208}

If German citizenship law has traditionally relied on \textit{jus sanguinis} - citizenship acquisition by blood or descent -\textsuperscript{209} France in contrast is one of the main countries of \textit{jus soli} - citizenship based on birth in the territory - which it extended respectively in 1851 and 1889 to the third and second generation of immigrants.\textsuperscript{210} It has also formulated more generous naturalization policies than, for example, Germany.\textsuperscript{211} France was the first country in Western Europe to naturalize Jews in 1791 in the aftermath of its revolution. Prior to recent changes, Turkish guest workers and their children had no opportunity to become citizens even when they were born in Germany. Many Turkish guest workers and their descendants are not citizens and yet they have lived long enough in Germany not to be considered foreigners either. They occupy an intermediary category that Tomas Hammar has called \textit{denizens}.\textsuperscript{212} Yet as Michael Walzer observed:

No democratic state can tolerate the establishment of a fixed status between citizen and foreigner (though there can be stages in the transition from one of these political identities to the other). Men and women are either subject to the state’s authority, or they are not; and if they are subject, they must be given a say, and ultimately an equal say, in what that authority does. Democratic citizens then have a choice: if they want to bring in new workers, they must be prepared to enlarge their own membership; if they are unwilling to accept new members, they must find ways within the limits of the domestic market to get socially necessary work done. And those are their only choices.\textsuperscript{213}

However, to prevent the formation of solidaristic communities that the inclusion of foreigners may occasion and as such jeopardize the French melting pot, citizenship has always


\textsuperscript{207} The 1905 law on the separation of church and government entrenched this principle in the constitution after previous reversals.


\textsuperscript{209} Brubaker, Rogers (1992) \textit{Citizenship and Nationhood in France and Germany}, p. 82.

\textsuperscript{210} Ibid., p. 85.

\textsuperscript{211} Ibid. p. 77.


been conceived as an individual not a group ascription. Consequently, the formation of ethno-national groups has “never been tolerated in France.” As Schnapper and Laveau recount, the Comte de Clermont Tonnère, one of the architects of the French constitution during the revolution, declared that: “one must refuse everything to Jews as a nation and grant everything to Jews as individuals... They must be citizens as individuals.”

Furthermore, citizens old and new have to show their patriotism. Renan referred to this as a “daily plebiscite”. Immigrants should pay allegiance to their new country rather than their country of origin. In the name of patriotism and because ethnicity is weak in jus soli, politicians arguing that foreign-born French are not committed to the Republic have many times over the past centuries sought to replace jus soli by jus sanguinis.

The last such attempt, in the 1980s under the right-wing government of Jacques Chirac, was particularly controversial. In the run up to the 1986 legislative elections, against the backdrop of allegations echoing André Siegfried’s statements in 1946 about the “unassimilability” of non-Western immigrants - particularly “Beurs” and the rise of the far Right’s Jean Marie Le Pen, Jacques Chirac sought to end automatic jus soli for second and third generation immigrants by adding a declaration of intention to acquire citizenship, which the state could accept or deny.

Chirac alleged that the decision would emphasize intentionality and consequently patriotism, but the vast public perceived it as an attempt to repel jus soli and opposed it. Chirac then tried to limit the measure to second generation immigrants but that was equally rejected. Finally the project was abandoned amid general reprobation. However, the requirement of a simple declaration upon reaching the legal age was introduced, although abolished in 1998. In 2003 an interview was instituted during which candidates for naturalization must show their assimilability through their mastery of French language, culture, and laws.

While these events proved citizenship and patriotism to be co-terminous in the French

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216 Renan, Ernest (1996) What is a Nation ?
217 The two other main ethnic crises, according to Gérard Noiriel, are the Dreyfus affair in 1880 and the denaturalization of Jews by the Vichy regime during the German occupation of France in the 2nd World War. For a deeper account of the ethnic dimension or “ethnic crises of the French nationality” see Weil, Patrick (2002) Qu’est-ce-qu’un Français? Histoire de la nationalité Française depuis la révolution”, Paris: Grasset, pp. 97-163.
218 They are second and third generation immigrants from North Africa who, unlike the majority of French, are Muslims and of Arabic and Berber origins. “Beurettes” is applied to women.
219 Ibid., p. 148.
220 Ibid., p. 138.
melting pot model, they also ushered in a theoretical debate about “the degree of openness” of this model, “the manner of becoming French” and assimilation in general. Many assimilationists concerned about individual autonomy or freedom of choice, or who had been influenced by the campaigns of many societal groups for human rights, asked for a reconceptualization of the notions of nationhood and citizenship. This “new idea of assimilation”, with more relaxed citizenship rules which became widespread in western Europe, was called with some inaccuracy “integration” and came into being with a new philosophical current, “liberal nationalism”.

1.1.2 David Miller’s Liberal Nationalism

The more subtle form of melting pot assimilation is underpinned by liberal nationalism, an approach embraced by authors such as Yael Tamir, Neil McCormick, and above all - David Miller. Like republicanism, liberal nationalism gives due place to the national culture. Nations have a right to self-determination, that is, to preserve their national identity. Miller defines “nation” as “a community (1) constituted by shared belief and mutual commitment, (2) extended in history, (3) active in character, (4) connected to a particular territory, and (5) marked off from other communities by its distinct public culture”. For Miller a common culture and nationality are necessary for forging trust and solidarity. These two elements are essential for the maintenance of the welfare state as well as an active citizenship associated with republicanism.

Miller does not coerce immigrants to adopt the dominant culture but rather seeks to encourage them to do so. This is because of his concern for individual autonomy. If immigrants are not prepared to adhere to the common culture, they are asked to “privatize”, that is, to keep their cultural beliefs and practices in the private sphere as long as they do not hurt others. They are not expected to give up their cultural identity but only to renounce those practices which are “illiberal”, such as forced marriages and female genital mutilation (FGM) that are practised in some of the countries in Africa and the Middle East. They are not, however, asked

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221 Ibid., p. 160.
227 Ibid., p. 92.
228 Hereafter I use the abbreviation FGM to designate Female Genital Mutilation.
to renounce those *beliefs* which can be considered “illiberals” such as the belief in the superiority of men over women. For example, Miller would not support the ban of the burqa that French authorities have recently instituted.\(^{229}\) Immigrants only need to accept the liberal minimum by tolerating the existence of opposing arguments.\(^{230}\)

Moreover, Miller recognizes that a national culture is open to various interpretations because it is no longer completely homogenous but the locus of different lifestyles from vegetarians to Goths to Rastafarians.\(^{231}\) Here the relationship is not unilateral as in the republican model where minorities are expected to adopt the dominant culture but is instead bilateral or multilateral. An exchange takes places between the national culture and the immigrants’ culture which modifies both. However, this exchange remains unequal and more favourable to the dominant culture. Foreigners’ cultural elements are allowed only if they seem acceptable or innocuous to the resident majority. For example, Indian curry, Chinese foods, African Djembe (drumming), Latin-American salsa dance and yoga practice and philosophy are part of Britain’s cultural repertoire today.\(^{232}\)

In sum, the idea emerging here is one of two spheres: a public culture which is the locus of politics, economics and law\(^{233}\) and, it is claimed, is neutral toward different conceptions of the good, and a private one which is the realm of religion and minorities’ cultures.\(^{234}\) It is within this private sphere that immigrants are allowed to do whatever they want, provided that no harm is caused to the public.

Miller promotes a republican form of citizenship where the citizen is active and involved in the daily life of the community in contrast to the liberal rights model where they are only united by a set of rights. An active citizen is “someone who plays an active role in shaping the future direction of his or her society through political debate and decision-making.”\(^{235}\) This view entails reciprocal obligations, a tacit quasi-contract between immigrants and the state.\(^{236}\) The state must not only guarantee equal citizenship and neutrality in the form of non-discrimination but it should also provide equal opportunities to immigrants. This entails


\[\text{234} \] Ibid.


equal access to public goods and any extra measures to address socioeconomic inequalities provided they do not impose excessive costs or jeopardize the existing legal and cultural frameworks. An example is the case of *Mandla vs. Dowell Lee* in 1983. Mandla, a turban-wearing Sikh pupil was denied access to a private English school because his turban and long hair violated the uniform code.

For Miller, the Sikh community is responsible for this missed opportunity. This is because wearing a turban is a cultural practice which can be forsaken. It is a choice and not an ascriptive feature like a physical disability, race or gender. Miller’s perspective on citizenship allows for programmes of redistribution targeting immigrants, but it would not allow religious courts like the Beth Din or the Islamic Sharia Council in Britain, which adjudicate civil disputes respectively between consenting Jewish and Muslim parties. It does not entail the existence of a separate educational system as in England where religious groups own schools and formulate their own curriculum but still receive funding from the government. Religious schools may exist for Christians but not for Muslims even if they remain under the ultimate control of the state.

In return, immigrants are requested to be active citizens. For Miller, that means being law-abiding, voting, and—as with republicanism—engaging in all kinds of civic activities: protests, social activities, being members of conservation groups and supplying information to police if needed. But he does not expect immigrants to adopt all the ways of long-established groups particularly in trivial issues. For example, Pakistanis or West Indians who have immigrated to the UK need not support the English cricket team to be true patriots as in the “Tebbit test”. Norman Tebbit, a Conservative British politician, said in 1990 that the real test of nationality for an immigrant from India or Jamaica was to support the English cricket team when it plays India or the West Indies. Immigrants should, however, strive to find work and be self-supporting as the true or false perception of immigrants’ over-reliance on state welfare is a major source of anti-immigrant sentiment.

Immigrants should also take up arms in the event of war, even if the aggressor is their

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237 Ibid, p. 11.
241 Ibid., p. 2.
country of origin, because citizenship is a contract of mutual protection.\footnote{Ibid., pp. 11-14.} Naturalized homegrown terrorists should be deprived of their citizenship. Candidates for naturalization should be required to pass civic and language fluency tests in order to obtain citizenship. The same goes for compulsory civic integration contracts in which some immigrants are requested to undertake language and professional training as a counterpart to state financial allocations. The archetypical example of this is the Dutch Newcomer Integration Law (WIN) drafted in 1998 which, in its current form, compels immigrants to pay for a year-long course which includes language, professional training and civic education. The acquisition of a residence permit, as well access to some of the state welfare provisions, depends on a successful outcome.\footnote{For a description of the Dutch case see Entzinger, Han (2003) “The Rise and Fall of Multiculturalism: The Case of the Netherlands” in Joppke, Christian and Morawska, Ewa (eds.), Toward Assimilation and Citizenship, Basingstoke: Palgrave-Macmillan.}

1.1.3 Tolerance

When one reconceptualizes and synthesizes the French republican model and liberal nationalism, the picture that emerges closely resembles the principle of religious toleration enunciated by John Locke in 1689.\footnote{Horton, John and Mendus, Susan (1991) (eds.) John Locke. A Letter Concerning Toleration in Focus, London: Routledge.} In A Letter Concerning Toleration, his masterpiece published that year, Locke advocates the separation of church and government. He writes:

I esteem it above all things necessary to distinguish exactly the business of civil government from that of religion, and to settle the just bounds that lie between the one and the other. If this be not done, there can be no end put to the controversies that will be always arising between those that have, or at least pretend to have, on the one side, a concernment for the interest of men’s souls, and, on the other side, a care of the commonwealth.\footnote{Shapiro, Ian (2003) (ed.) John Locke, A Letter Concerning Toleration and Two Treatises of Government, New Haven, CT: Yale University Press, p. 218.}

His argument relies on two claims. Firstly, God has given to no person the power to police other people’s faith and no reasonable person would allow such occurrence. Secondly, the use of force (imprisonment, fines, etc.) to compel individuals only has a limited effect on matters of faith. There is no way of looking into people’s souls in order to ascertain if their religious commitments are false or true.\footnote{Ibid., pp. 218-219.}

In another book published the same year, Two Treatises of Government, Locke added that the role of the state was solely to preserve life, liberty and property. Religious truth could only be ascertained through free debate and, even so, faith was a personal matter because it
could neither be imposed nor verified.\textsuperscript{247} This principle underpinned the Act of Toleration passed by the English Parliament the same year.\textsuperscript{248} The Act established the Anglican Church as the state church, and although the state disapproved of other churches, it refrained from banning any of them except the Catholic Church. This is minimal toleration. As Anna Elisabetta Galeotti explains, toleration:

\begin{quote}
meant both the absence of political coercion in matters of faith and conscience and the delegitimation of religious interference in politics. But the political authorities felt no compunction in favouring a particular Church or endorsing a state religion, as long as other churches and creeds were not persecuted.\textsuperscript{249}
\end{quote}

This \textit{modus vivendi} brought to an end the persecution of dissenters and heretics within Protestant churches.\textsuperscript{250}

In 1859, John Stuart Mill further refined toleration with his \textit{harm principle}. According to this principle, things which do not or would not cause direct harm to the wider public or another person should not be coercitively prevented by the state.\textsuperscript{251} Mill writes in \textit{On Liberty} that:

\begin{quote}
I deny the right of the people to exercise such coercion either by themselves or by their government. The best government has no more title to it than the worst. It is as noxious or more noxious, when exerted in accordance with public opinion, than when in opposition to it. If all mankind minus one, were of one opinion, and only one person were of the contrary opinion, mankind would be no more justified in silencing that one person, than he, if he had the power, would be justified in silencing mankind.\textsuperscript{252}
\end{quote}

He distinguishes two types of Acts. The first are other-regarding acts, which justify the state’s intervention on the basis of direct physical harm being caused to others. The second is self-regulating acts which do not call for any interference because they are a private matter that cause no direct harm to others. He writes that:

\begin{quote}
\end{quote}

The maxims are, first, that the individual is not accountable to society for his actions, in so far as these concern the interests of no person but himself. Advice, instruction, persuasion, and avoidance by other people if thought necessary by them for their own good, are the only measures by which society can justifiably express its dislike or disapprobation of his conduct. Secondly, that for such actions as are prejudicial to the interests of others, the individual is accountable, and may be subjected either to social or to loyal punishment, if society is of opinion that the one or the other is requisite for its protection.  

In this regard, John Horton defines toleration as “a deliberate choice not to interfere with conduct of which one disapproves.” As such, toleration is not neutral toward different conceptions of good life but has a marked preference for the majority one. However, if the state refrains to exercise constraint, it is not because it does not have the means to do so. A marker of toleration is that the one who exercises toleration is more powerful than the one who is tolerated, but any form of constraint would be intolerance. By giving priority to the national culture while allowing immigrants to pursue their own cultural practices in the private sphere, both French republicanism and liberal nationalism conform to this ideal.

The object of toleration, what is there to be tolerated or not, is even more emblematic. Applied to contemporary issues such as cultural headgears (burqa and the Sikh turban), toleration would want that the state exercises restraint and use subtle persuasion only when it is a matter of security. Liberal nationalism embodies toleration by “letting minorities conduct themselves as they wish without being criminalized, so long as they do not interfere with the culture of the majority, and with the ability of members of the majority to enjoy the life-styles of their culture” as illustrated.

The principle of the separation of church and government mirrors the “strategy of privatization” where minorities are allowed to practise their cultural beliefs as long as they do not harm others directly. The harm principle can also be equated to the liberal minimum which requests that minorities accept the existence of lifestyles which differ from theirs and abstain from practices which the majority rejects. As in the 17th century, toleration helps to maintain social cohesion and peace which may be undermined if minorities were not allowed to practise their cultures.

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253 Ibid., p. 55.
258 Ibid.
One distinguishes two main variants of toleration according to the degree of enforcement of the mechanisms described above. The first, mutual toleration, allows the presence of immigrants’ cultures in the public sphere alongside the majority culture but in its shadow. The second, minimal toleration, takes a harder approach to the application of the strategy of privatization and the harm principle. It seeks to convince immigrants to adopt the majority culture.

However, many issues have been raised which show the limits of toleration. The first issue is the lack of consensus over the definition of harm. Susan Mendus doubts that it is even possible to have a conception of harm which is not value-laden but neutral between different moral points of view.\(^{259}\) This means that what is viewed as harmful depends on the cultural context. For example, practices, such as polygamy and female circumcision that are considered harmful in the West, are not viewed as such in countries where they are common practices.

The second issue is whether toleration can deal with offence without censorship.\(^{260}\) That is, to what extent should racist or other expressions be tolerated in the name of personal autonomy (freedom to determine one’s lifestyle)\(^{261}\) when they offend other groups in the societies and as a consequence threaten social cohesion? This issue is illustrated by the publication of *The Satanic Verses* by Salman Rushdie in 1988.\(^{262}\) Whilst Muslim communities in Britain and around the world were offended by what they considered blasphemy, many British commentators upheld the text’s publication as freedom of expression. Authors who argued for its censorship claimed that such expressions are morally unacceptable and influence people’s behaviour in society; whereas those who argued against its censorship pointed out that freedom of expression is one of the foundations of Western culture.\(^{263}\)

The third issue deals with the concept of tolerance in the current context. It is argued that the state should be neutral toward every cultural group and not just be tolerant or request the privatization of cultures because of the universalization of the freedom of conscience and freedom of association. Thus, owing to the view that people have the right to express

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themselves as they want, toleration cannot be even-handed or provide equal treatment. It is also stated that it could lead to the hidden influence of the dominant church in the government. That is, by favouring the majority culture, the majority church may indirectly influence government, thus eroding a sacrosanct democratic principle for society: the separation of the church and the state.

Lastly, many claim that toleration does not allow the dominant culture to examine itself which is important for “the battle against prejudice and importance.” Toleration, it is argued, does not express real respect and consideration. A “condescending and fragile acceptance is humiliating and an impediment to the development of a healthy, autonomous, and self-reliant personality (such as the liberal citizen ideally should have).”

1.2 Theories of Multiculturalism

Multicultural theory emerged as a critique of assimilationist policies and thinking with regard to the formation of ethnic enclaves and continued socioeconomic disparities between natives, and immigrants and their descendants. Multicultural theory criticizes assimilation on three main grounds. The first critique is that the separation of the public and private spheres is superficial. In reality, it is a continuum. Religion, cultural practices and beliefs, which include the moral education given at home, “burst” into the public sphere as evidenced by the case of Mandla vs. Dowell Lee and the “foulard affair” in 1989 in which three French Muslim schoolgirls wearing headscarves were refused access to school by an Afro-Caribbean headmaster on the ground of “laicité” or secularism. The state, too, interferes in the private sphere by extending its prerogatives to matters which relate to family and community well-

266 Ibid., p. 98.
267 Ibid.
270 For a reminder, see my description in the section on David Miller’s liberal nationalism.
being through social welfare provisions like family counselling and the education system. These matters are not by definition harmful or illiberal.

The second critique is that the public sphere and its alleged civic and public culture are not neutral but hegemonic. The public culture is said to be the locus of the majority culture and even nationalism. Any public culture by default bears the hallmarks of a religion and a language that are associated with the history and experiences of the majority group. France, for example, follows the Gregorian Christian calendar and observes Christian holidays. Its language is that of the Gallic majority. Defenders of multiculturalism argue that pressure is exercised on minorities to modify their cultures as these are seen as inferior. This hegemony reflects the power of a class of majority decision makers, mostly white males, whose cultural biases impact on standards and evaluations used in school and employment. Minorities, despite the intense efforts of some of them to join the mainstream, are never totally accepted because they are tagged as different.

The third critique, which flows from the previous one, is that universal equal rights and the notion of equal treatment embodied in anti-discrimination legislation do not translate into reality in such circumstances. Tools of evaluation and recruitment in society such as standardized tests, foreign degree equivalences and the merit system are skewed against ethnic minorities and women, due to cultural and racial biases about their foreign non-Western qualifications, skin colour, gender, prejudice, accents, language skills, and cultural differences.

Bhikhu Parekh interprets the case of *Mandla vs. Dowell Lee*, when a turban-wearing Sikh pupil was denied admission to school, in a different light to David Miller. He writes that:

...opportunity is a subject-dependent concept... and not an opportunity for an individual if she lacks the capacity, the cultural disposition or the necessary cultural knowledge to take advantage of it. A Sikh is in principle free to send his son to a school that bans turbans, but for all practical purposes it is closed to him.

Multiculturalists such as Charles Taylor, Iris Marion Young and Bikhu Parekh advocate the

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276 Ibid., p. 165.
278 See my previous section on liberal nationalism for Miller’s position on a similar affair.
recognition of cultures and various forms of group rights.

1.2.1 Charles Taylor and the Politics of Recognition

Following Frantz Fanon, Immanuel Wallerstein and Gunnar Myrdal, Taylor asserts that the non-recognition or misrecognition of minorities’ identities is a source of harm; manifesting itself in moral distress and low self-esteem. This is a different interpretation of the concept of “harm” to Mill’s exclusive focus on direct harm. Every culture has a meaning for its practitioners.

The thesis is that our identity is partly shaped by recognition or its absence, often by the misrecognition of others, and so a person or group of people can suffer real damage, real distortion, if the people or society around them mirror back to them a confining or demeaning or contemptible picture of themselves. Nonrecognition or misrecognition can inflict harm, can be a form of oppression, imprisoning someone in a false, distorted, and reduced mode of being.

Like Hegel and before him, Johann Gottfried Herder, Taylor predicates that one of the most important aspects of human life is its “dialogical nature”, a phenomenon which, he says, cuts across two spheres.

First, in the intimate sphere, where we understand the formation of identity and the self as taking place in a continuing dialogue and struggle with significant others. And then in the public sphere, where a politics of equal recognition has come to play a bigger and bigger role.

Being oneself is constructed upon this interaction with the community. True happiness lies in being “oneself”, being “authentic” and not trying to be someone else: a “wannabe” or

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284 Ibid., p. 25.
288 Ibid., p. 37.
289 Ibid., pp. 29-30.
a “whitize.”\textsuperscript{290} The state must recognize minority cultures and not denigrate them if that is their conception of the good life and with regard to its responsibility to provide to each individual the opportunity to pursue happiness.\textsuperscript{291} Simple equal rights which entail procedural equality do not go far enough to recognize what is “specific” to everyone, the “ways” in which citizens differ.\textsuperscript{292} That is, assimilation does not cede enough respect to personal autonomy; the right of people to determine their identity individually or collectively.\textsuperscript{293}

Procedural liberalism may quickly prove inadequate in a context marked by increased diversity and the desire of communities to keep their culture.\textsuperscript{294} Taylor laments the tyranny of a one-sided individualism that is at the heart of the idea that autonomy exists when we detach ourselves from others.\textsuperscript{295} He defends in this respect collective rights. Some of these group rights are:

- rights against genocide, forced assimilationism, and ethnic cleansing, to secession, self-determination, semi-autonomous status, territory, control over resources, recognition as distinctive and/or oppressed, recognition of a group’s language as one of the official languages of the country, subsidies to help keep a culture alive, a fair share of public funding, expanded educational and economic opportunities, political participation as groups and full citizenship and non discrimination for their members.\textsuperscript{296}

The mechanisms of implementation for this policy are, as for the French melting pot, public education and language. But contrary to melting pot assimilationist models, where one language and one set of values are emphasized, a multiculturel curriculum teaches minority cultures and languages to majority children and vice-versa. Thus, if a society like Quebec considers the preservation of French a common and precious good as illustrated by Quebec’s Bill 101, it is legitimate that it should be allowed to do so, provided that it also shows respect for diversity and human rights.\textsuperscript{297} Promulgated in 1977, the Charter of the French Language, Bill 101 sought:

- to make French the only official language of Quebec;

\begin{footnotes}
\item[290] Slang directed toward an African-American and an African in France, respectively, who are said by their peers to try to emulate white manners.
\item[292] Ibid., pp. 39-41.
\item[293] Ibid., p. 42.
\item[294] Ibid., pp. 60-61.
\item[295] Ibid., pp. 57-58.
\end{footnotes}
• to make French the compulsory language of education in Quebec, except for the indigenous anglophone minority;
• to make French the language of public administration in Quebec;
• to make French the language of work in the private sector in Quebec;
• to make French the language of commerce and publicity.  

Although it eventually failed, the Lake Meech Agreement signed in 1987 re-affirmed Quebec as a distinct society within Canada at the same time that it recognized the rights of anglophone Quebeckers within the Province.

Another example is New Zealand’s official biculturalism inherited from the 1840 Treaty of Waitangi. This agreement delineates relationships between Māori (natives) and Pākehā (European settlers). It formally puts both cultures on the same pedestal but also confers special status to the Māori community as the spiritual and cultural custodians of the land. This special status has allowed them to claim collective rights of a socioeconomic nature such as rights to the seabed and foreshore.

The Treaty of Waitangi Act, established in 1975, is administered by a tribunal which has “exclusive authority to determine the meaning and effect of the Treaty as it is embodied in the two texts (Māori and English) and to decide issues raised by the difference between them.” The Tribunal has 4 main areas or “principles” of jurisdiction: “the principle of active protection, the tribal right to self-regulation, the right of redress for past breaches, and the duty to consult.” Whilst Taylor limits group rights to historic minorities, Bhikhu Parekh includes immigrants and Iris Marion Young envisages even larger categories such as women, religious denominations and lesbian, gays, bisexual and transgender groups.

1.2.2 Iris Marion Young and the Politics of Difference

Young supports a politics of difference as a means of fighting oppression. The recognition of cultural differences empowers and liberates people from the two main forms of

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social oppression: racism and sexism. “No longer”, she says, “does one have the impossible project of trying to become something one is not under circumstances where the very trying reminds one of who one is.” Young valorizing minorities and their cultures helps to relativize the dominant culture and challenges the claim that it is neutral and universal. This compels members of the dominant culture to regard their culture as just one among many. Finally, the politics of difference encourages group solidarity, as opposed to liberal individualism which serves better the goal of the liberation of the group.

Young advocates three mechanisms of enforcement to that effect. The first mechanism directly addresses cultural issues. It is, as Taylor argues, multicultural and multilingual education. Governments must give to minorities who represent a significant percentage of the population like Spanish-speaking Americans, African-Americans and Native Americans the possibility of maintaining their language and culture. This means providing education and public information in their languages.

The second mechanism is what Young refers to as comparative worth policies. By this she means the reversal of cultural biases in the measurement of the worth of female-dominated occupations. This could be done, for example, through the creation of schemes that guarantee similar wage structures for female-dominated jobs like nursing which tally with male-dominated jobs in industries involving similar degrees of skill, difficulty, stress, and so on. In other words, to be meaningful, these schemes, she suggests, will have to be gender-conscious and will have to disregard gender-neutral criteria for which women are at a disadvantage, such as educational level and dexterity.

The third mechanism is affirmative action. Young declares that affirmative action is not only meant to redress past inequalities but also to compensate “for the cultural biases of standards and evaluators used by the school or employers.” She is concerned not with equal treatment but with equal outcome. She agrees that affirmative action programmes violate equal treatment because one needs race or gender-conscious criteria for the promotion of disadvantaged groups. For Young, the main ‘problem’ is not the social conditions of minorities but the biases of the tools of evaluation and merit. For this does not represent equal

302 Ibid.
304 Ibid., p. 272.
305 Ibid., p. 271.
306 Ibid., p. 251.
treatment, only a strong policy of affirmative action can ensure a better numerical representation of minorities.

In that respect, Young supports a form of group rights which she calls “differentiated citizenship,”308 that is, the group representation of minorities (people of colour, women, and homosexuals) in the decision-making process. She argues that this will give these minorities a voice in agenda setting and guarantee both procedural and substantive fairness. When everyone is represented, everyone’s needs are more likely to be met. Group representation also gives to minorities a sense of entitlement and produces a richer body of knowledge about social issues.309

She does not prescribe any particular mode of representation as she feels that this “depends on the political situation, on the nature of the structural cleavages of the polity, possible trade-offs with other political, and the institutional context for representation.”310 As an example, the system of representation set for Māori in New Zealand was besieged by all sorts of problems regarding the voting system and the design of electoral districts, until a proportional electoral system allowed a Māori party to emerge.311 Nevertheless, she supports greater diversity of representation in the policy making process.

1.2.3 Bhikhu Parekh’s Pluralist Universalism

Like Taylor and Young, Parekh asserts that recognition is an essential component of people’s identity and its absence can cause harm.312 He defines multiculturalism as “a body of beliefs and practices in terms of which a group of people understand themselves and the world and organize their individual and collective lives.”313 Furthermore, he argues that individuals are all culturally embedded. For him, no culture can be termed a priori worthless. It does not mean that cultures all have the same value but that “each deserves at least some respect because of what it means to its members and the creative energy it displays.”314

A Muslim girl, for example, might be unwilling to swim in shorts, or undergo an internal examination by a male doctor; or a Sikh boy not want to go to school without his turban. Unless the wider society accommodates such demands, except when they are patently unreasonable or excessively costly, it makes it difficult for

308 Ibid., p. 251.
311 Ibid., p. 150.
313 Ibid., pp 3-4.
314 Ibid., p. 336.
these people to integrate.³¹⁵

Lastly, Parekh argues that cultural diversity as a source of enrichment is desirable and unavoidable, while every culture itself is plural.³¹⁶ Although he is against some cultural practices including polygamy and FGM, he explains that, immigrants’ practices such as arranged marriages and the wearing of the Islamic veil³¹⁷ that produce no harm to others, and are viewed by the majority as illiberal, represent different notions of the good life. In this vein he argues that, “principles of toleration cannot be laid down in advance, and are best elicited by means of an open-minded intercommunal dialogue [pluralist universalism] aimed at evolving a reasonable consensus.”³¹⁸

Parekh supports, too, the introduction of multicultural education in all schools not only those where a sizeable part of the population has a non-Western background as suggested by David Miller. His argument is that a monocultural education is Euro-centric and more likely to “breed arrogance, insensitivity and racism.”³¹⁹ Putting students in “contact”³²⁰ with other cultures and histories, in terms which are positive, opens students’ imagination and increases their respect and understanding of other cultures. Thus if a school instructs schoolchildren about colonialism, it should include in its syllabus both Joseph Conrad’s Western classic Heart of Darkness³²¹ and Chinua Achebe’s Things Fall Apart.³²² Achebe’s book consistently has been ranked among the best literary works of the 20th century,³²³ or indeed of all time. This can be advanced as evidence that non-Western works can be canonical.³²⁴ The Nigerian author offers a perspective on the encounter between the West and Africa which is both instructive

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³¹⁸ Ibid., p. 19.
³¹⁹ Ibid., p. 226.
³²⁴ Saul Bellow allegedly said that “when the Zulus produce a Tolstoy we will read him.” Actually, a form of derision that insinuates that, some cultures are superior to others. Charles Taylor rebukes his statement (1994) “The Politics of Recognition”, p. 42.
and different from that of Conrad’s.\textsuperscript{325}

Parekh argues that misrecognition also has a material basis which, left unresolved, can pose a serious threat to the stability of society.\textsuperscript{326} He predicts that the dominant group will refuse to acquiesce in the “rigorous critique of the dominant culture and radically restructuring the prevailing inequalities of economic and political power.”\textsuperscript{327} Demands for a politics of recognition may result in political contestation and even violence, like the rioting of youths of Arab and black African descent in November 2005 in France.\textsuperscript{328}

Like Young, Parekh argues for the group representation of minorities in public policy making and the public sphere.\textsuperscript{329} But, for him, what matters is not the form that these rights take but their content and even better, their implementation.\textsuperscript{330} Despite its importance, equal citizenship is not enough. Minorities must also secure a sense of belonging which derives from them being accepted and not merely tolerated.\textsuperscript{331} This ‘commitment or belonging’ is reciprocal: “Citizens cannot be committed to their political community unless it is also committed to them, and they cannot belong to it unless it accepts them as belonging to it.”\textsuperscript{332} This means redefining the concept of national identity in terms that are more inclusive and non-ethnic.\textsuperscript{333} He argues to that effect thus:

Assimilationism is not as simple and smooth a process as the assimilationist imagines. The assimilating person is never quite sure when she has become assimilated fully and whether she is accepted. She is therefore anxious to prove to herself and others that she has assimilated, is generally loud and earnest to show that she is not a counterfeit, which makes her strangeness even more visible and comical. She is also constantly at the mercy of others, who alone are in a position to certify whether or not, and how much, she has assimilated, and remains permanently subordinate and heteronomous. As if this is not enough, she needs to keep pressuring other members of her group to assimilate, because if they do not that reflect badly on her and is embarrassing. Since some of them might not, she must join others in condemning them or at least disown and keep her distance from them, with all the moral and psychological corruption this involves.\textsuperscript{334}

\textsuperscript{326} Parekh, Bhikhu (2000) Rethinking Multiculturalism, p. 343.
\textsuperscript{327} Ibid.
\textsuperscript{328} Ibid., p. 342.
\textsuperscript{329} Ibid., pp. 217-218.
\textsuperscript{330} Ibid., p. 342.
\textsuperscript{331} Ibid.
\textsuperscript{332} Ibid., p. 341.
\textsuperscript{333} Parekh, Bhikhu (2008) A New Politics of Identity, p. 84.
1.2.4 The Celebration of Difference

The celebration of difference presupposes first that a person’s well-being is linked to an equally vibrant cultural community.\textsuperscript{335} Charles Taylor makes this point when he asserts that human identity is both individually and collectively constructed, and interaction with the group and the wider society plays an important role in the process of identity formation. Iris Marion Young makes the same point when she argues that the neglect of immigrants’ cultures is a source of alienation and Bhikhu Parekh when he claims that each individual is embedded in a culture.\textsuperscript{336}

Second, multiculturalists see in every culture a potential, a moral value of the kind bestowed on every human being that demands respect and recognition, meaning that there are many valuable ways of life.\textsuperscript{337} Moreover, they see benefit in diversity. As Douglas Hartmann and Joseph Gerteis explain using the metaphor of musical harmony:

Harmony is not based on the homogeneity of musical pitches but in fact requires a variety of notes that fit together and complement one another. This is not to insist that all diversity is good, but only to suggest that not all diversity is bad and that some forms can be very good indeed.\textsuperscript{338}

Taylor asserts that diversity consolidates democracy. Owing to the fact that our identity results from a dialogue, the recognition of multiple identities requires a deliberative society.\textsuperscript{339} Young and Parekh point to diversity’s regenerating effects on the dominant culture and contribution to social peace and equality.

Unlike assimilationists who are more concerned about how the individual fits in the society and about same treatment, multiculturalists tend to be egalitarians in terms of outcome. That is, they are more concerned with substantive equal opportunity and accordingly try to find solutions which accommodate the claims of minority social groups. Theories of group rights find their origins in attempts to resolve such claims.\textsuperscript{340} According to Paul Kelly, group rights

are a defining characteristic of multiculturalism which distinguishes it from other cultural theories in other disciplines which equally assert the importance of cultural identity in personal development.\textsuperscript{341}

However, like assimilation, multiculturalism faces criticism. Some opponents argue that because cultures have ethical contents which can be opposed, it is “logically impossible to recognize all cultures as equal.”\textsuperscript{342} It is also argued that the equal recognition of cultures “destroys the very notion of value. If everything is of value, nothing is of value.”\textsuperscript{343} For example, Western and Muslim views on arranged marriages and polygamy are nearly irreconcilable.\textsuperscript{344} Multicultural policies are also said to have negative effects on the welfare state.\textsuperscript{345} The first effect is “crowding-out”, which consists in laying focus, energy and time on “soft” issues such as the numerical representation of minorities instead of “hard issues” such as economic redistribution.\textsuperscript{346} That is, immigrants may benefit more from having equal opportunity as a result from structural change.

The second effect is “corroding”. It is argued that ethnocultural diversity undermines trust and solidarity.\textsuperscript{347} As such, citizens are less likely to contribute to welfare schemes if they have the perception that the beneficiary is not “one of them” but is instead an immigrant or from an historic minority. In the same vein, it is argued that because most welfare arrangements result from reparations to historical injustices, they lead to a “politics of identity” or “politics of grievance” which undermine trust between groups.

The third effect is “misdiagnosing”. It is alleged that the problem of minorities is “economic marginalization not cultural misrecognition”. Policies which are based on culture are inadequate to solve problems that are structural in nature.\textsuperscript{348} For example, educational policies such as the Afro-centric curricula and bilingual English-Spanish programmes installed

\textsuperscript{347} Ibid., p. 11
\textsuperscript{348} Ibid., p. 13.
in some US schools are also presented as a means of bridging the economic gap between these minorities and the rest of the population. Rather they are a source of disunity and a threat to societal security.\textsuperscript{349}

Theories of group rights especially those that support affirmative actions and measures are said to violate the principles of non-discrimination and equality themselves\textsuperscript{350} as exemplified by the landmark case \textit{Bakke vs. Regents}. Alan Bakke, a white American male, was denied admission to a University of California medical school twice, in 1973 and 1974, allegedly because preference had been given to Hispanic and African-American applicants with lower grades. He sued against discrimination and eventually won before the US Supreme Court.

On the one hand, the ruling of Judge Powell affirmed that government may take ethnicity into account when this does not affect any other racial group in order to remedy past proven disadvantages. On the other hand, it declared that the “fatal flaw” in the school programme of admission had been their “disregard of individual rights as guaranteed by the Fourteenth Amendment” and the Civil Rights Act of 1964 which guards against any discrimination on the grounds of race from any publicly funded institution.\textsuperscript{351} In New Zealand, ownership dispute over the seabed and foreshore has been particularly tense between Māori, the government and the rest of the population. Many voices among the latter have complained that the rest of the population’s access to until now considered public amenities was threatened.

Group rights are also said to be inherently deficient because their pluralistic composition is likely to lead to contradictory claims. Freedom of religion may be pitted against freedom of expression.\textsuperscript{352} The external protections and internal restrictions, with which some social groups avail themselves, have been said to legitimize oppressive and illiberal practices such as FGM. They have also been said to impose a costly exit on those members of the communities who refuse to conform, for example, by ostracizing them. To the extent that many


In response, Taylor and Parekh have both clarified that collective rights should not override individual rights such as freedom of conscience or freedom of choice. Taylor supports the idea of a liberal minimum which limits the extent to which multicultural accommodation can go.\footnote{Taylor, Charles (1992) “The Politics of Recognition”, p. 62.} He also explains that the goal of affirmative action is to help historically disadvantaged or discriminated people to get to the same level as other groups. But once this goal is attained, these measures should be lifted. The politics of difference is not meant to go back to “an eventual ‘difference-blind’ social space but, on the contrary, to maintain and cherish distinctness, not just now but forever.”\footnote{Ibid., p. 40.}

Parekh agrees that immigrants and natives have “to share some basic beliefs and values” to maintain some sort of cohesion.\footnote{Parekh, Bhikhu (2008) \textit{A New Politics of Identity}, p. 83.} He further recommends that minority groups conform to the majority view if both fail to reach a consensus through an intercultural dialogue. He cites as examples polygamy, which is outlawed in Western countries, and freedom of expression which has been held as paramount to any other concerns including blasphemy, as illustrated by the Rushdie affair.\footnote{Parekh, Bhikhu (2000) \textit{Rethinking Multiculturalism}, p. 294.} As for Young, she agrees that affirmative action violates the principle of non-discrimination by being gender and race-conscious, but that it is justified by the need not only to redress past injustices or present inequalities resulting from these injustices, but also to compensate “for the cultural biases of standards and evaluators used by the schools or employers.”\footnote{Young, Iris, M. (1989) “Polity and Group Difference”, p. 171.} However, none of the authors above sees all cultural practices are equally valid.
As suggested at the beginning of the chapter, there is much dissonance among scholars about the concepts of multiculturalism and assimilation. These are essentially polysemic concepts. Thus an effort of conceptualisation is necessary. More refined and “sensitive” definitions that describe policies more accurately are needed along with new conceptual tools such as Giovanni Sartori’s empirical universals. When one applies Sartori’s middle range conceptualization, which seeks to extract the defining characteristics of a concept from various theoretical perspectives, it appears that Danish assimilation policy amounts to toleration and Swedish multiculturalism to the celebration of difference.

Toleration is characterized by disapproval of minority cultures and the prominence given to the majority culture. Yet, it is also characterized by the non-interference from the state, unless a practice is directly harmful to the majority of the population. An example of such harm is polygamy. The fact that a practice is indirectly harmful for a minority group does not itself warrant state intervention. The state can only use persuasion to this effect. These dimensions are found both in the French republican model and David Miller’s liberal nationalism. This classic form of toleration is often termed liberal toleration. It differs from toleration as recognition enunciated by Anna E. Galeotti. Unlike the former, the latter allows the recognition of minority cultures in the public sphere, albeit in a symbolic way as a mark of respect and for the standing of these groups.

However, opponents argue that the demarcation line between a neutral public sphere and a private sphere is not a viable one but instead reflects the hegemony of the dominant ethnocultural group. This is illustrated by the state’s efforts toward cultural reproduction, which are often based on the promotion of the national language and culture. The definition of what is harmful itself has been subject to many interpretations and controversy. For example, the publication of Salman Rushdie’s *The Satanic Verses* pitted the freedom of religion of Muslims embodied in the anti-blasphemy law against the freedom of expression of the majority. Examining the evolution of Danish cultural integration policies from the mid-1960s to 2006 and the politics of assimilation around it, one should be able to find evidence of one or both variants of toleration, but also expect the kind of polemic which has surrounded *The Satanic Verses*.

The celebration of difference entails that immigrants’ happiness is linked to the existence of a vibrant culture of their own. Diversity is seen as a good in itself. It is a source of enrichment for the country’s own culture and the state has the duty to promote it actively. Yet the celebration of difference conforms to a liberal minimum. These are immigrants’ practices or beliefs such as polygamy or FGM which are viewed as unacceptable by the resident majority. Taylor’s politics of recognition, Young’s politics of difference and Parekh’s pluralist
universalism emphasize the same principle. As such, looking at Swedish multicultural policies, one should be able to identify aspects of the celebration of difference but also instances where the liberal minimum is enforced.
Chapter 2: Theories of Policy Change and Continuity: Ideas, Policy Streams, Gatekeepers and Path Dependence

The term “policy”, like “assimilation” and “multiculturalism”, has been the subject of many definitional debates, albeit less controversial. According to Hague et al., in its broadest sense, it can be defined as the course of action or inaction which politicians in power, or vying for power, want to take, a “more general notion than a decision and… a predisposition to respond in a specific way.” Building on David Easton’s landmark study of the political system, Edward C. Page distinguishes two main types of policy: intentions and actions.

Intentions consist of policy principles and policy lines. The former are “general views about how a policy should be conducted.” For example a policy whose goal is to increase the labour participation of immigrants but which does not mention any specific means. Policy lines incorporate more specific goals, such as the delivery of Danish or Swedish language courses to immigrants to improve their labour market participation.

Actions fall into the two categories of measures and practices. Policy measures are “specific instruments that give effect to distinct policy lines” and practices are the patterns of behaviour expressed by those in charge of implementing those measures. Following Harold Lasswell, the policy process is generally understood to involve five stages: initiation, formulation, implementation, evaluation and review.

This chapter explains in detail the theoretical and methodological constellation of my research. That is, the way the ensemble of theories I use, combine and knit with the Configurative Comparative Method and the five policy stages sketched out in the introduction.

360 This definition is a synthesis of various definitions. Hague, Rod; Harrop, Martin and Breslin, Shaun (1998) Comparative Government and Politics, pp. 255-256.
363 Ibid.
364 Ibid., p. 211.
365 There are many variations of this chain. For example, initiation and decision-making, and evaluation and review appear in some descriptions as either separate or joint phases. Yet, their dynamics are essentially the same and continuous. For more explanation, see Almond, Gabriel, A. and Powell, George, B. (1978) Comparative Politics. System, Process and Policy, Boston and Toronto: Little, Brown and Company, p. 245.
Policy initiation involves agenda setting and decision-making. Agenda setting depicts the process through which a particular issue comes to the attention of policymakers. As Richard Shaw and Chris Eichbaum write:

Public policy is by nature contested: interest groups, private sector firms, unions, political parties, officials compete to draw public attention and government attention to their concerns. The number of issues which governments could attend to is virtually limitless. But in practice there are political and economic constraints on what they can achieve, and it is during the agenda setting stage that governments decide which particular issues they will concentrate on.\footnote{Shaw, Richard and Eichbaum, Chris (2005) “The Policy Process” in \textit{Public Policy in New Zealand: Institutions, Processes and Outcomes}, Auckland: Pearson Education, p. 15. On interest groups, an interesting presentation is Wilson, Graham, K. (1990) \textit{Interest Groups}, Oxford, UK: Cambridge. The main statement on the influence of interest groups in the field of immigration policy is Freeman, Gary, P. (1997) “Immigration as a Source of Political Discontent and Frustration in Western Democracies”, pp. 42-64.}

Decision-making refers to the policy option stage. After taking up an issue, policymakers must choose between policy alternatives. In Denmark and Sweden, decision-making is made in very similar ways in governmental cabinet meetings, select committees and plenary sessions of the parliament. However, governments can also choose to avoid an issue, a phenomenon referred to as non-policy or non-decision-making. In a rebuke of Charles Wright’s and Robert Dahl’s respective theories of elitism\footnote{See Dye, Thomas, R. and Zeigler, Harmon (1975) \textit{The Irony of Democracy}, 3rd edition Belmont, California: Wadsworth.} and pluralism, Peter Bachrach and Morton Baratz argue that policymakers can deliberately ignore an issue that they do not view as “safe” by promoting values and practices which counteract it.\footnote{Bachrach, Peter and Morton Baratz (1962) “The Two Faces of Power”, \textit{American Political Science Review}, Vol. 56, No 4, p. 948.}

They discern five main ways this occurs: through physical violence toward opponents, the co-option of opponents, the use of existing rules and procedures, or a change of these rules to thwart opposition and deterrence both from the government and the opposition when each anticipates a negative reaction from the other.\footnote{Ibid.} Building on Bachrach’s and Baratz’s work, Steven Lukes adds a third dimension of non-decision-making: actions aimed at influencing “people’s preference so that neither overt nor covert conflicts exist”.\footnote{Ibid.}

Policy formulation is the process of finding answers to a problem. It relies essentially on policy analysis. Christopher Ham and Michael Hill distinguish “analysis \textit{for} policy” which seeks to provide solutions to governments from “analysis \textit{of} policy” which investigates their
actions. Analysis for policy is underpinned by two main models: the rational model put forward by Herbert Simon and the incremental model described by Charles E. Lindblom. The rational model, in general, seeks to formulate the most efficient policy, while in the incremental model, actors want to craft a consensual policy. This study falls into the second category.

This process in the agenda setting phase can be influenced by pressure groups, expert communities, and so on. But governments can also consult their own agencies, other agencies, experts, and associations. According to Gabriel A. Almond and George B. Powell, policy initiation and policy formulation together form the “broader, direction-setting and means-providing” stage of the policy process or policy making.

The three stages above underpin policy change, that is, the process by which policies come to life. They are commonly referred to as “policy-making”. For agenda setting, I explore John W. Kingdon’s model on policy streams. For decision making, I combine Erik Bleich’s and Sheri Berman’s approaches on gatekeepers and propose a new perspective which I call the “activist gatekeeper.” I also explore Ellen M. Immergut’s perspective on veto points. Finally, using the configurational method described in the introduction, I turn all these theories into variables or conditions which are applied to the empirical data in Chapter Five on the critical juncture when the two countries’ cultural integration policies diverged.

Policy implementation, policy evaluation and review constitute the utilization stage of the policy process. Although a continuous process, the utilization stage, as opposed to policy

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372 The other, less cited models of policy analysis are: institutionalism, which emphasizes policy as the product of government structures and institutions, and elitism. For a useful review, see Chilcote, Ronald, E. (1994) Theories of Comparative Politics: The Search for a Paradigm Reconsidered, Boulder: Westview Press.
376 Ibid.
377 Policymaking mostly stands at the high level of government. One must distinguish high-level government from other levels of government: regional and municipal. Policies usually differ at the local and regional level especially in areas where opposition parties are in power. Yet the general policy is formulated by the national government.
378 The policy process is continuous despite these divisions. Although they can normally be studied separately, they are better understood when all the stages are taken into account. Understandably, there are material and time constraints which impact on what the researcher can do.
making, obeys a different “active substance”. “Novelty”, or change, feeds the dynamics of policy making, whereas policy implementation is rooted in continuity or the “longue durée”. Implementation is the structuring of a policy into institutions through the drafting of legislation, choice of policy measures, allocation of resources and setting up of programmes and services. As Christopher Ham and Michael Hill observe, institutions can be formal or informal, physical or non-physical.\(^{379}\)

The ‘top-down’ and ‘bottom-up’ approaches are paradigmatic in the field of implementation studies. The former, pioneered by Jeffrey L. Pressman and Aaron Wildavsky, posits that high-level policymakers want, above all, to ensure that policy is applied according to their goals.\(^{380}\) The latter, put forward by Michael Lipsky, claims that policy executioners “bend” these policies to their shapes.\(^{381}\) However, recent studies, the so-called “third generation studies”, have sought to move beyond this dichotomy by allying the two approaches. One such study was carried out by Bo Rothstein, who emphasizes the role of policy design. Yasemin Soysal uses Rothstein’s perspective to make a typology of immigrants’ incorporation regimes. Furthermore, policy implementation as suggested by Christina Boswell can also be functionalist. Policymakers do not necessarily change their policy intentions after failure. They often experiment with various approaches.\(^{382}\)

Policy evaluation requires the examination of policy outputs and policy outcomes. The former focuses on governmental actions, that is, what it produces. The latter relates to the


\(^{380}\) Wildavsky, Aaron and Pressman, Jeffrey, L. (1973) *Implementation: How Great Expectations in Washington are Dashed in Oakland; Or, Why it’s Amazing that Federal Programs Work at All, This Being a Saga of the Economic Development Administration as Told by Two Sympathetic Observers Who Seek to Build Morals on a Foundation of Ruined Hopes*, Berkeley: University of California Press.


government’s performance in relation to its objectives. This study deals with policy output in the sense that it examines the body of legislation produced by both countries, not their degree of efficiency. None of the two countries’ integration policies is said to have been successful. I do not seek to establish which country’s cultural integration policy has achieved better results. Policy evaluation is often merged with policy review which comes at the end of the evaluation stage. Policy review may lead to policy maintenance, revision or termination.\textsuperscript{383}

Once adopted, they tend to “take a life of their own” as a result of path dependence. Following Andrew Bennett, path dependence occurs through four main mechanisms: negative feedback, policy cycles, reactive sequences of uncontrolled events, and increasing returns.\textsuperscript{384}

My ontological and epistemological approaches to policy adoption emphasize causality, context whether subjective or intersubjective, and reject essentialism. Yet, as already indicated in the introduction, I acknowledge the theoretical contributions of other authors although I view them in a different light. These are, first, the role of “pressure groups” namely the Swedish bureaucracy and LO, the confederation of trade unions underlined by Hammar and Lund. In my opinion, these interest groups came to bear upon socioeconomic rather than cultural integration policy. Second, the impact of electoral and political behaviour as argued by Karpantschof, Rydgren, Green-Pedersen and Krogstrup, and Green-Pedersen and Odmalm. These aspects, I suggest, explain the strengthening of Denmark’s assimilation policy in the 1980s and 1990s rather than its source. Third, the influence of globalizing factors. The human rights ideology emphasized by Hansen and Soysal appears to have been limited to the two countries’ socioeconomic integration policies. While authors such as Joppke\textsuperscript{385} have claimed that there is a convergence of European Union countries’ integration policies under the influence of Europeanization, I believe like Suzanne Mulcahy and Cowles et al. that this process is rather limited to socioeconomic and political integration policies. Europeanization cannot explain their divergent cultural integration policies. Also, Sweden joined the EU only in 1996, 21 years after Denmark. In that vein, europeanization is most likely to explain divergence than convergence. However, Denmark has opted out from the main EU immigration instruments, and Danish policymakers namely Pia Kjasgaard have repeatedly called on the EU to follow Danish immigration and integration policies rather than the reverse. Lastly, as Mulcahy points out “[t]he main problem with this pro-convergence literature is its limited comparative scope, which means it provides only a partial picture and thus tends to

\textsuperscript{383} Ibid., pp. 277-278.
exaggerate the extent of convergence”.  

The first section of this chapter elaborates on the theories of policy change, namely policy streams and gatekeepers. The second section examines the theories of continuity, notably Pressman and Wildavsky’s ‘top-down’ approach, Lipsky’s ‘bottom-up’ approach, Rothstein’s functionalist approach and path dependence.

2.1 Theories of Policy Change

The public policy-based research on policy change falls into two clusters. The first, policy transfer, views policy innovation as induced by external (international) determinants and the product of policy diffusion. There are various approaches: bandwagoning, convergence, diffusion, emulation, policy learning, social learning, lesson drawing, and so on. Together they emphasize “intentionality”, that is, a conscious effort to acquire knowledge. However, they are of little relevance to the study of cultural integration in Denmark and Sweden in as much as neither government went to “fetch” a policy and the trajectory of each policy was shaped by local processes and policy making factors.

Precisely, as Page writes, the second cluster, “agenda literature”:

provides a framework that allows one to outline the proximate causes that lead to attention being devoted to an issue: How an issue comes to emerge from relative obscurity to becoming something that is being discussed as a serious contender for

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As I argue, the choice of multiculturalism in Sweden was the result of the action of Olof Palme and his ideas in an environment which, like in Denmark, was not receptive to this policy.

2.1.1 John W. Kingdon’s Policy Streams

Research falling within the agenda literature operates at two levels. One strand analyses policy change from a “mainstream political science” perspective (rational-choice, institutionalism, structuro-functionalism, socioeconomic factors and ideas). Brubaker claims, for example, that the geographical position of France and Germany was the source of their respective citizenship traditions: republicanism and ethno-nationalism. Ronald Inglehart argues that the advent of post-materialist values was occasioned by a change of generation in advanced industrial societies. In her comparative study of the evolution of the German and Swedish social democratic parties in the interwar period, Sheri Berman shows that ideas as programmatic beliefs determined the course of action of each party.

Another strand draws insights from the aforementioned theories and “customizes” them for public policy. One of the most seminal works within this strand is John W. Kingdon’s policy streams framework. According to Kingdon, agenda setting occurs through three independent processes or streams. The first stream is that of problems. Policymakers must choose among competing issues often peddled by policy entrepreneurs. Michael Mintrom defines policy entrepreneurs as:

People who seek to initiate dynamic policy change… They do this through attempting to win support for ideas for policy innovation. Contributors to the agenda setting literature suggest policy entrepreneurs use several activities to promote their ideas. These include identifying problems, networking in policy circles, shaping the terms of the terms of policy debate, and building coalitions. Policy entrepreneurs can play a key role in identifying policy problems in ways that both attract the attention of policymakers and indicate appropriate policy responses.

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The literature on ethnic mobilization suggests two interactive factors: group deprivation or grievances and group mobilization by a policy entrepreneur. Ted Robert Gurr, a pioneer in the field, explains that:

peoples’ discontent about unjust deprivation is the primary motivation for political action, whereas [group mobilization] emphasizes leaders’ calculated mobilization of group resources in response to changing political opportunities.  

Unless a situation is seen as posing a particular challenge, it is unlikely that it would come to the attention of policymakers.

The second stream is politics. Kingdon purports that the saliency of issues depends on the political situation of the moment. “[S]wings of national mood, election results, changes of administration, changes of ideological or partisan distributions in Congress, and interest group pressure campaigns” can affect the destiny of a policy’s content.  

The third stream is that of policies. These are a range of solutions available from policy communities. According to Kingdon, they are pre-packaged and float around waiting to be matched with policies. When all three streams are aligned, an idea’s time has come and policy entrepreneurs have a unique window of opportunity to push it to the top of the government’s agenda. The figure below illustrates Kingdon’s policy streams and their functioning.

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404 Ibid., pp. 165-178.
In the 1990s, two new influential theories were put forward. Drawing inspiration from the theory of evolution of Eldredge and Gould, Baumgartner and Jones introduced the notion of “punctuations”. They argue that policy development is not incremental but occurs through sudden shocks, most of which are external. Shocks occasion the loss of policy monopoly. Once these shocks are resolved, periods of stability follow. This model does not apply to the policy process in Denmark and Sweden because despite the Cultural Revolution in the 1960s and indeed a re-evaluation of the concept of culture in both countries, neither in the public opinion, nor in the policymakers’ radar, was ethnocultural diversity an issue of importance. No external shock or major crisis in the cultural sectors steered cultural policy toward a specific course of action.

Sabatier and Jenkins-Smith claim the existence of advocacy groups which share ideas and policies, and compete with each other. These advocacy groups are stable in their core principles but adaptive in their non-core beliefs. Change happens when favourable conditions occur in the environment allowing them to become suitable in the eyes of policymakers.

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407 Ibid., p. 17.
Sabatier’s and Jenkins-Smith’s model provides a different perspective into the underlying processes within Kingdon’s policy stream and how these processes, in their own right, shape agenda building. Therefore, the two theories are not in opposition, in as much as they are both evolutionary theories and complement each other. More significantly, as I argue, the adoption of multiculturalism in Sweden was essentially the work of Olof Palme in a context which was unfavourable to such a policy line.

Yet Kingdon’s model has its limits. First, it has been argued that its three spheres may be less independent and more interdependent than he claims. Second, the mechanisms underlying the opening and closing of policy windows are not clearly defined. Finally, his model is said to be more descriptive than prescriptive. These criticisms may be true but with regard to my policy research goal, its most important limit lies in its focus on the pre-decision stage. Decision makers are not merely passive and nor do they sit behind a veil of ignorance. They are human beings with emotions, perceptions and personal identity which influence their actions and ideas. In turn, these actions and ideas can affect a policy’s trajectory. The functioning or arrangement of structures can influence policy outcome too.

2.1.2 Bleich-Berman’s Perspective and the New “Activist Gatekeeper”

Sheri E. Berman and Erik Bleich offer two interesting perspectives on these aspects which complement Kingdon’s model. In his study of educational multiculturalism in England and France, Erik Bleich designed a model which takes into account both the influence of policymakers and the hierarchical structure of decision making such as those of Denmark and Sweden on policy formation. According to Bleich, among policymakers there is a special breed called gatekeepers. These are individuals or groups who have the “power to make or block a policy decision”. They make a decision that conforms to their “priors”. Priors are “ideational assumptions which affect their attitudes to change. When a new idea runs contrary to the gatekeepers’ priors, it is unlikely that it will be implemented”. The concept belongs to the growing ideational literature that, in essence, seeks to illuminate the impact of ideas on policy

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411 Ibid., p. 32.
414 Ibid., p. 82.
change and continuity. However, this growth has come with a proliferation of concepts which is somehow confusing. For example, Bleich used “priors” in his early publications and “frames” in the recent ones. In the course of this study, I use both concepts interchangeably.

The “structure of gatekeepers,” that is, the number of gatekeepers and the way they are arranged, also matters. They constitute checkpoints which can either open the road or prevent an idea from evolving. When there is one gatekeeper which is the best case scenario as in Figure 2b or many gatekeepers aligned sequentially as in Figure 2a, it is a zero-sum game. If the gatekeeper(s)’ priors are favourable, the policy idea takes shape rapidly. If the priors are negative, failure is almost unavoidable. On the contrary, if there are multiple gatekeepers who are spatially arranged as in Figure 2c which is common in federal systems, the policy has more than one chance to be adopted, as policy entrepreneurs can hawk their ideas around.

**Figure 2: Gatekeepers and the spread of ideas**


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417 Ibid., pp. 90-91.
In essence, Bleich’s theoretical framework is similar to Berman’s. However, Berman’s “carrier”, as opposed to Bleich’s gatekeeper, is mobile and proactive. She writes that in order to be heard in a world where different ideas are calling out for attention, an idea must be adopted by a person or group [carrier] able to make others listen or render them receptive. The possibility that an idea will be adopted and become prominent in the system increases with the influence of the carrier. He or she will ensure that the idea remains salient by building a consensus around it in her or his party, mentoring and co-opting like-minded individuals or using it as a common denominator among in-groups. Some authors argue that ideas are “epiphenomenal”, meaning they are the result of other factors such as interests and institutions and, as a consequence, they cannot have a proper causal effect.

Even so, there is no consensus on how ideas act as independent variables. This is evident in the “constructivist school”, to the extent that it “subordinates” ideas to environmental factors (interests or institutions). Ideas are viewed as a means of furthering interests and can be used as “weapons” in political battles. Hall cites as such Margaret Thatcher’s monetarist argument against the British Labour party during the 1979 general elections. They can also serve as “focal points”, that is, objectives on which actors agree or as guidelines, “roadmaps”, and “flashlights”, which reduce uncertainty in periods of crisis. Kathleen McNamara shows, for example, that decisions concerning exchange rates

420 Ibid.
421 Ibid., pp. 41-42. Ideational theories suffer from the theoretical bias which favours more empirically grounded theories such as political economy and neo-institutionalism. It has been suggested that this neglect is due to the backlash, which followed the misuse of ideology by Nazi forces, after World War II. However, ideational theories have enjoyed a spectacular revival over the past decades maybe as Schmidt has stated because of the collapse of communism and the problem of democratic transitions that other theories could not explain. See Blyth, Mark (2002) Great Transformations. Economic Ideas and Institutional Change in the Twentieth Century. Cambridge, UK: Cambridge University Press, p. 17. Schmidt, Vivien, A. (2005) “Institutionalism and the State” in Hay, Colin; Marsh, David and Lister, Michael (eds.) The State: Theories and Issues, Basingstoke: Palgrave, pp. 98-117.
within the European Monetary System were fostered by ideas rather than rationalism and interdependence.\(^{427}\)

Within an institutional context, Theda Skocpol and Margaret Weir claim that the degree of receptivity of an institution to an idea determines how much impact the idea will eventually have on policymakers. The authors write that “we must ask not about the presence of individual persons or ideas in the abstract, but whether key state agencies were open or closed to the use or development of innovative perspectives”.\(^{428}\) In the same vein, Peter A. Hall asserts that ideas must be compatible with the interests of politicians and political parties, namely their electoral interests, and that they must be able to be implemented by administrative agencies.\(^{429}\)

By contrast, the “rationalist” school of ideas is adamant that ideas are independent variables capable of initiating an outcome. Scholars, who follow this tradition, separate ideas from other causal factors such as interests, institutions, structures and even political culture.\(^{430}\) Berman, one of its proponents, writes that one just needs to prove that an idea held at time T had an effect at time T-1, so that “the crux of the matter lies in distinguishing between situations where ideas govern actions and situations where decision makers consciously or unconsciously use the language of ideas to justify policy choices made on other grounds.”\(^{431}\)

This does not mean that ideas and other factors are mutually exclusive. In fact, there is rarely a single explanatory factor but often a combination of two or more, albeit with a varying degree of currency.\(^{432}\) As Berman states, “ideas do not float freely”\(^{433}\) and “ideas, norms, and culture can be both dependent and independent variables. Neither role need be considered

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dominant in the abstract; scholars should simply differentiate them and investigate which is appropriate to the project at hand”.

A new kind of gatekeeper, however, emerges when one combines both models: the activist gatekeeper. On the one hand, this gatekeeper stays at the entrance as indicated by Bleich but does not go and fetch a policy as theorized by Berman. On the other hand, he or she does not just push the “accept” or “reject” button as stated by Bleich, but can take on the role of promoting a policy if his or her priors are strongly favourable and/or the environment is particularly hostile. This gatekeeper becomes an “activist.” He or she has a personality and thus, is more likely to be an individual than a group.

Bleich’s and Berman’s approaches and Kingdon’s policy framework complement each other well but they still present some limits. First, Kingdon’s model does not account for the origins of priors. It is not enough to determine whether gatekeepers’ “ideational assumptions” were favourable or not to multiculturalism. For a more convincing argument, one also needs to know where Danish and Swedish gatekeepers’ priors came from. It is possible to avoid the “infinite regress of ideas” by identifying proximate causes, which can often be located in interests, personal experience or institutions. Second, for some policies, the decision making process does not end once policies pass through gatekeepers. They continue into parliament. The power of the executive, the parliamentary and electoral systems can themselves shape policy output as Ellen M. Immergut demonstrates in her study of the health policies of France, Sweden and Switzerland.

2.1.3 Ellen M. Immergut’s Veto Points Analysis

As mentioned above, Ellen M. Immergut’s study on the emergence of national health insurance systems in France, Sweden and Switzerland provide a useful demonstration of how the nature of institutions of decision making impacts on the policy process. Immergut shows that despite similar health insurance programmes, and—to use an expression by Roy Macridis—the same “parallelogram of… forces”, their outcomes were different. All programmes proposed doctors’ fee control and a national health insurance system funded by the government. But doctors were opposed to it. In Switzerland the proposal failed, and the government ended up providing subsidies to private insurance brokers. In France it was partly

successful. The government established a national and publicly funded system but achieved only partial control of doctors’ fees. In Sweden the proposal was fully implemented.⁴³⁷

Immergut shows that neither the power of medical unions in terms of resources and organization, nor political partisanship affected these policy outcomes. The unionization of doctors fluctuated between 40 and 60% in France and reached 90% in both Sweden and Switzerland.⁴³⁸ All three governments were eager to pass the Bill and political parties’ support for the Bill across the three countries was non-ideological.⁴³⁹ Immergut considers the design of the decision making process as the main causal factor.

She specifies three distinct arenas – the executive, the legislative and the electoral - at whose intersection a veto point can appear. Between the executive and the legislative arenas, a veto point can appear if a parliament overrides a decision made by a government which does not enjoy a stable majority and parliamentary discipline. There can be another veto point between the legislative and electoral arenas if a part of the electorate can overturn a decision made by the parliament through a referendum or if parliamentarians change their positions because of an upcoming election.⁴⁴⁰

She argues that institutions taken as formal rules and procedures:

> do not allow one to predict policy outcomes. But by establishing the rules of the game, they do enable one to predict the ways in which these policy conflicts will be played out … By providing different opportunities for vetoing legislation, the institutions change the relative weights of these actors as well as the most opportune strategy available to these actors⁴⁴¹.

In France, the final Bill reflected the political bargaining among members of parliament which the 4th Republic’s direct parliamentary rule encouraged.⁴⁴² In Switzerland, where direct democracy is practised through popular caucuses and decision making, despite protracted negotiations between the government and parliament, the Bill was blocked by a referendum mounted by doctors’ unions.⁴⁴³

In Sweden, a majority parliamentary system combined with the presence of a party majority and party discipline allowed the proposal to move through the Riksdag unopposed.⁴⁴⁴ The figure below represents the scenari derived from the study. The executive arena illustrates

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⁴³⁸ Ibid., pp. 59-60.
⁴³⁹ Ibid., pp. 61-62.
⁴⁴⁰ Ibid., p. 66.
⁴⁴¹ Ibid., pp. 63-68.
⁴⁴² Ibid., pp. 68-73.
⁴⁴³ Ibid., pp. 73-78.
⁴⁴⁴ Ibid., pp. 78-82.
the Swedish case. Immergut’s approach also offers a suitable model for examining the passage of Sweden’s cultural integration policy Bill through parliament in 1974. One should be able to find out in particular if there was a veto point or not.

Figure 3: Political arenas and veto points

<table>
<thead>
<tr>
<th>Arenas</th>
<th>Moves</th>
<th>Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive</td>
<td>Can members of parliament Overturn Executive Decision?</td>
<td>If Yes, then Veto Point</td>
</tr>
<tr>
<td></td>
<td>(Stable Parliamentary Majority?)</td>
<td>If yes, then No Veto Point</td>
</tr>
<tr>
<td></td>
<td>Party Discipline?)</td>
<td></td>
</tr>
<tr>
<td>Legislativ</td>
<td>Can Members of the Electorate Overturn Parliamentary Decisions?</td>
<td>If Yes, then Veto Point</td>
</tr>
<tr>
<td>Electoral</td>
<td>(Shifting Voters? Referendum?)</td>
<td>If Yes, then No Veto Point</td>
</tr>
</tbody>
</table>


Taken together, all the theories pinpointed above should help us to determine the origins of Danish and Swedish cultural integration policies. The relevant aspects which I shall examine are:

1. *The problematization of an issue*. Was the cultural integration of immigrants debated and considered as a problem in Sweden as opposed to Denmark?

2. *A change in the stream of politics*. Did the occurrence of an election, government reshuffling, political scandal or crisis change the political landscape and facilitate the adoption of multiculturalism in Sweden and hinder its adoption in Denmark?

3. *The presence of policy*. Were the tenets of a multicultural policy available to policymakers?
4. The structure of gatekeepers and their priors. Were the arrangement of gatekeepers either spatial or sequential and were gatekeepers’ priors against multiculturalism in Denmark and in favour of multiculturalism in Sweden? Where did these priors come from?

5. Parliamentary majority. Depending on the nature of the policy making process, did a government enjoy a parliamentary majority?

6. Party discipline. Did that majority support government policy?

All the six theoretical questions above are turned respectively into conditions A, B, C, D, E, and F. Then I use crisp set Qualitative Comparative Analysis to weave them together. As explained in the general introduction csQCA denotes the combination of two conditions. 0 marks the absence of a condition or factor. 1 marks its presence. “x” means that conditions are combined. “+” means “or” and denotes the existence of an alternative path in conformity to principle of equifinality.

This principle means that in the case of a policy transfer or learning, a bill would reach directly the gatekeeper(s) without going through the agenda setting process. In majority parliamentary systems, like those of Sweden and Denmark, the parliament can initiate a policy. “/Y” marks the presence of an assimilationist policy or the failure to formulate a multicultural policy. “Y” denotes the adoption of a multicultural policy. The truth table below illustrates this policy making process.

Table 1: Configurational Comparative Method with theoretical typology: truth table

<table>
<thead>
<tr>
<th>Case</th>
<th>Problem</th>
<th>Politics</th>
<th>Policy</th>
<th>Gatekeeper</th>
<th>Party</th>
<th>Party</th>
<th>Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dk</td>
<td>A0</td>
<td>x</td>
<td>C1</td>
<td>D0</td>
<td>E0</td>
<td>x</td>
<td>F0</td>
</tr>
<tr>
<td>Swe</td>
<td>A1</td>
<td>x</td>
<td>C1</td>
<td>D1</td>
<td>E1</td>
<td>x</td>
<td>F1</td>
</tr>
</tbody>
</table>

2.2 Theories of Policy Continuity

Policy continuity deals with the reproduction of policies over time, notably how a policy is implemented and how it is maintained, continued or revised. The ‘top-down’ approach was
pioneered by Jeffrey Pressman and Aaron Wildavsky in one of the first studies of implementation. The opposite claim, the ‘bottom-up’ approach was put forward by Martin Lipsky in 1981. Many authors have sought a third way through synthesisization because of the limits shown by each model. The functional approach proposed by Bo Rothstein remains one of the most influential perspectives within this body of research. Regarding policy maintenance, path dependence is the most influential theory. It emerged from the neo-institutionalist turn which occurred in the 1980s.

2.2.1 The ‘Top-down’ and ‘Bottom-up’ Approaches

The two theoretical paradigms on policy implementation derive from scholars’ efforts to understand policy failure, a particularly thorny issue for policymakers. The ‘top-down’ approach pioneered by Jeffrey Pressman and Aaron Wildavsky in 1973 originated from the study of a failed project of economic revival of Oakland (a small town in California blighted by poverty) by the US Economic Development Agency. Despite a successful planning phase, the project was a failure.

Pressman and Wildavsky argue that this failure stemmed from the divorce between policy formulation and implementation because attention was given more to policy design than to implementation details. In their view, most policies were implemented in this way and only by including execution details during policy formulation, policymakers would be able to garner local support and, identify in advance problems in the decision-making sequences.

By contrast, Michael Lipsky argues in his book, Street-level Bureaucrats, that the lower ranking corps of policemen, judges, employees, ticket controllers and so on, in charge of implementing policies at street level play a “critical role.” However, limited resources, heavy workloads and unclear or contradictory directives compel them to develop practices or patterns of behaviours which reflect their levels of frustration more than mandated measures. As such, these implementers have a power of discretion over policy making and enjoy “relative autonomy” from top managers.

However, as Laurence O’Toole points out, enough research “ha[s] accumulated to

446 Wildavsky, Aaron, B. and Pressman, Jeffrey, L (1973) Implementation, p. 143.
447 Ibid., p. 143-144.
449 Ibid., pp. 13-16.
partially validate ‘top-down’ and ‘bottom-up’ accounts”. And “virtually all analysts have moved past the rather sterile ‘top-down’ and ‘bottom-up’. New proposals and contingent perspectives have been offered”. In fact, the most important work of implementation in integration studies, Soysal’s regimes of incorporation, is a study of policy process and design, and not outcome. Her model is also a good illustration of the synthetic approach. Her “corporatist” and “statist” models exemplify the ‘top-down’ approach, while her “liberal” model illustrates the ‘bottom-up’ approach. However, viewed in the light of Rothstein’s perspective, it appears as “rationalistic and mechanistic”. Her model is no less cogent. On the contrary, it remains a useful lens for examining and understanding both states’ integration policies. As I show in Chapter Four, they applied each of these regimes of incorporation albeit with a frequency that can be likened to chronic instability.

2.2.2 The Functionalist Thesis

In his book, Just Institution Matters, Bo Rothstein argues that “implementation research has taken an excessively mechanistic and rationalistic view of the process of implementation”. He urges scholars to look past policy failure and consider other aspects of policy implementation. He proposes especially that one distinguishes between design and execution issues. Rothstein’s views are relevant to my own argument. Indeed, any study of implementation does not need to investigate policy failure in order to inform scientific enquiry.

For example, in a comparative study where the researcher’s preoccupation is to explain policy divergence, the failure or success of policy implementation matters less than the processes which gave birth to this policy. Neither Danish nor Swedish policymakers have been successful in their integration policies. A researcher only needs to be clear about his or her object of study, to carefully distinguish subfield from subfield, cultural integration from socioeconomic integration, and policy design from policy failure.

Following Rothstein’s perspective, I interpret this institutional instability as arising from attempts by policymakers to revise policies which they saw as failing. Lindblom famously said that policymakers “muddle through”. They experiment with various models of implementation design including non-policy design for various reasons; out of which policy

451 Ibid., p. 267.
453 Ibid., p. 64.
454 Ibid., p. 64-72.
failure is only one outcome, albeit the most prominent. Christina Boswell offers a concrete example of how a functionalist approach applies in the field of migration. She explains the inability of Western countries to curb immigration growth, the “liberal constraint” by the two “imperative functions of the liberal state”: its legitimacy and capacity to govern. Legitimacy is embodied by each of the following four criteria: security, accumulation, fairness and institutional legitimacy. The first two often lead to restrictionist policies and the rest to inclusive policies.

Security stems from the state duty to safeguard its territorial integrity and provide peace to its inhabitants. States not only want to know that they have control over who comes into their territory and avert human trafficking, acts of terrorism, and irregular migration, but they also want to reassure the public in that sense. Accumulation proceeds from the state role in providing the regulatory framework and structures for economy development. The most important expectation from policymakers besides security is the economic well-being of their countries.

Fairness results from the state’s obligation to distribute “the costs and benefits of social interaction in what is considered to be a fair way”. One interpretation of the “fair way” is restrictive. It is based on the notion that state legitimacy comes first from its protection of the national interest. Another interpretation is more inclusive. According to Seyla Benhabib, governments will not eschew national interests, but will also consider the “rights of others”. Institutional legitimacy refers to public confidence that state practices conform to certain formal conditions considered vital for the preservation of democracy and liberty. Such formal conditions include the rule of law, separation of powers, conformity with the constitution, and respect of civil liberties.

It is a depiction of policy implementation rather than policy initiation. These rights are universal in outlook and give consideration to humanitarianism. Boswell puts an

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457 Ibid., p. 89.
458 Ibid., p. 90. Thus, despite the official ban on labour immigration in the 1970s, labour migration still continued to fill labour gaps in a number of branches in many countries. Since the late 1990s states have been competing to attract high-skilled workers, such as nurses and doctors, to fill shortages in crucial sectors. Immigration is also viewed as a means to increase tax revenue, which is necessary to support the pension system, with a general trend toward an ageing population in the West.
459 Ibid., p. 89.
emphasis on the functionality of the state rather than the currency of institutions, interests or ideas, although the latter may still mediate the former and, in some circumstances, have more explanatory power. Boswell’s framework is conceived for immigration policy, but it can also be applied to integration issues.

Even so, unlike Boswell, I do not draw a specific or exhaustive list of functions. Such a list would still be “mechanistic”, despite the level of theoretical neatness that it provides. Our inability to materially analyse the entire universe of cases also warrants a cautious approach. A remaining question is how to distinguish a synthesized approach from a functional approach. I suggest that the frequency with which institutional design change occurs in a setting over a period of time should alert researchers. Perhaps by changing their socioeconomic policy implementation designs so often, Danish and Swedish policymakers only sought to exercise their regalian functions?

### 2.2.3 Path Dependence

Path dependence is the main variant of new institutionalism, the current paradigmatic school in the institutionalist tradition. New institutionalism underlines the role played by institutions, unlike rational choice and ideational theory that emphasize respectively the importance of interests and ideas. New institutionalism emerged as a counter theory to the behaviourism of the 1950s, which focused on the informal power of groups within the political system. It was referred to as new institutionalism to distinguish it from the “old institutionalism” prevalent among scholars at the turn of the twentieth century and which

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463 The power-interest perspective claims that the state is subject to the pressure of interest groups. Interests can be defined as the particular end that an actor wants to attain. “Interests” should be differentiated from “preferences”. Interests refer to general ends, whereas preferences mark specific means and policy goals. See William, Clark, R. (1998) “Agents and Structures: Two Views of Preferences, Two Views of Institutions”, *International Studies Quarterly*, Vol. 42, No 2, pp. 245-270. Together with game theory, they form the mainstream of economic theory. Game theory investigates the behaviour and attitudes that an actor adopts toward preserving his or her interests. In political science, rational choice is studied together with the concept of power, which is the ability that an actor has to bring others to act in a manner they would not have acted in themselves. See Dahl, Robert (1957) “The Concept of Power”, Behavioural Science, Vol. 2, No 8, pp. 763-772; Olson, Mancur (1979) (First published 1965) *The Logic of Collective Action. Public Goods and the Theory of Groups*, Cambridge, Massachusetts: Harvard University Press.

merely described institutions\footnote{Evans, Peter B.; Rueschemeyer, Dietrich, and Skocpol, Theda (1985) (eds.) \textit{Bringing the State Back In}, New York: Cambridge University Press.} or studied “the formal institutions of government and [defined] the state in terms of its political, administrative and legal arrangements.”\footnote{Steinmo, Sven and Thelen, Kathleen (1992) “Institutionalism in Comparative Politics”, pp. 3-5. Schmidt, Vivien, A. (2005) “Institutionalism and the State”.} 

Although there is no common definition, new institutionalism defines institutions in a broader sense than previous schools. Institutions include formal or physical institutions such as courts of justice, constitutions and administrative agencies, and informal and abstract ones such as “rules and procedures that structure conduct... norms and class structures”.\footnote{Ibid. p. 2.} It views the state and its institutions as not dominated by pressure groups, but as actors in their own right, capable of agency.

In \textit{Bringing the State Back In} which heralded the new institutionalist turn, Margaret Weir and Theda Skocpol demonstrate that state structures and past policies, as opposed to ideational and power-interest factors, were the primary factors in the different ways that Sweden, Great Britain and the USA implemented Keynesianism in the 1930s.

New institutionalism, besides path dependence or historical institutionalism,\footnote{Both labels are used interchangeably.} compounds two other variants: rational choice institutionalism and sociological institutionalism. The first investigates the nature of rational action within institutions. The second considers institutions as embedded in a culture and society with its practices, rules and norms. This puts the two variants at odds because the object of enquiry of sociological institutionalism is outside institutions.\footnote{Vivian A. Schmidt claims the existence of a fourth variant, “discursive institutionalism”, which involves the intersection between ideas and institutions. However it is still debated whether discursive institutionalism is different from other ideational theories. Schmidt, Vivien, A. (2008) “Discursive Institutionalism: The Explanatory Power of Ideas and Discourse” in \textit{Annual Review of Political Science}, Vol. 11, No 1, pp. 303-26. Schmidt, Vivien, A. (2009) “Taking Ideas and Discourse Seriously: Explaining Change through Discursive Institutionalism as the Fourth “New Institutionalism” , \textit{European Political Science Review}, Vol. 2, No 1, pp. 1-25.} Path dependence assumes that the evolution of institutions and their context at the time, their record of past laws and regulations “locks” them into a given path, hence the term “path dependence”. A government will see some policies as more suitable than others and once adopted the tendency will be to continue them.\footnote{Weir, Margaret and Skocpol, Theda (1985) “States Structures and the Possibilities for ‘Keynesian’ Responses to the Great Depression in Sweden, Britain, and the United States”, p. 205.} James Mahoney calls this phenomenon “inertia”.\footnote{Mahoney, James (2000) “Path Dependence in Historical Sociology”, \textit{Theory and Society}, Vol. 29, No 4, p. 277.} According to Hugh Heclo\footnote{Weir, Margaret and Skocpol, Theda (1985) “States Structures and the Possibilities for ‘Keynesian’ Responses to the Great Depression in Sweden, Britain, and the United States”, p. 205.} and Bo Rothstein,\footnote{Weir, Margaret and Skocpol, Theda (1985) “States Structures and the Possibilities for ‘Keynesian’ Responses to the Great Depression in Sweden, Britain, and the United States”, p. 205.} the early formation of corporatist institutions of compromise in Scandinavia explains the development of the welfare state.
In a review of the literature on path dependence, Andrew Bennett and Colin Elman described path dependence as “a time during which there are a number of plausible alternatives \((t_0-t_1)\), followed by a ‘critical juncture’ where contingent events lead one of these alternatives to emerge \((t_1-t_2)\), after which actors are constrained to remain on that path \((t_2-t_n)\)”.

This underscores four dimensions: causal possibility, contingency, closure and constraint. Causal possibility corresponds to equifinality which, as mentioned previously, is the existence of alternative causal factors or independent variables at the phase of policy initiation. Contingency “implies that the causal story is affected by a random or unaccounted factor”. This random event can be a crisis or a government change. These moments of creation are usually referred to as critical junctures. Closure denotes the gradual loss of alternative paths over time. One policy orientation will gradually gain ground over competing options. Constraint refers to the prohibitive effects of a shift to an alternative policy.

Figure 4 below, which illustrates the trajectories of various European political regimes based on Gregory Luebbert’s study of regime types, shows that many options were equally available at the inception: fascism, dictatorship, liberal democracy and social democracy. However, various random events sent them down different policy paths at particular moments (critical juncture).

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475 Ibid.
Bennett and Elman state four main perspectives. The first emphasizes the concept of increasing returns. Scholars working within this strand hypothesize a “linear” policy evolution based on the positive feedback received by policymakers or the lock-in effects mentioned above. Paul Pierson argues that such a “lock-in” prevented the reform of public pensions.

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under the Reagan administration in the 1980s in the USA. The implementation of a private system was precluded because pensioners’ benefits were funded by current payers on a pay-as-you-go basis. Privatization would have led to a double payment.\footnote{89}

By contrast, the second perspective denotes that path dependence can be fostered by negative feedback. Policy failure may prompt decisionmakers to change some of their practices and behaviours in order to achieve their initial goal.\footnote{479} Robert Jervis, a proponent of this thesis, points out for example that the Cold War did not only produce a conflict between the USA and the former Soviet Union but led the two countries to increase their might and stature as superpowers.\footnote{480}

The third perspective, as posited by Mahoney, states that constraints can arise from reactive sequences. The implementation of a policy may occasion the social mobilization of its opponents and a series of events which eventually lead to the achievement of the initial goal. Mahoney cites Dr Martin Luther King’s campaign for the poor, which was fledgling but, owing to his untimely death, spurred a chain of reactive events that prompted policymakers to launch the kind of programmes he had advocated.\footnote{481}

The fourth perspective still sees path dependence as occurring through cyclical “ping-pong” policy processes.\footnote{482} Abbot and Elman refer to Roe Vs Wade, which legalized abortion in the USA but also led to the mobilization of its opponents and a subsequent narrowing down of the policy.\footnote{483} Gerald Rosenberg explains that:

\begin{quote}
while supporters and critics of Roe and Wade might disagree as to whether the court’s action since 1973 upheld the spirit and logic of the decisions, it is clear that they did not end efforts to limit the availability of abortion. Ten years later, the court felt it necessary to acknowledge the continuing conflict over abortion and reaffirm its earlier decisions.\footnote{484}
\end{quote}

\footnote{480} Andrew Bennett, and Colin Elman (2006) “Complex Causal Relations and Case Study Methods”, p. 251
\footnote{484} Ibid.
While increasing returns is the most celebrated form of constraint as illustrated by the stories of QWERTY, VHS (Video Home Service) and Microsoft/Intel, Scott Page argues that they are only extreme cases of dependence. Cases which display multiple equilibria should also be considered path dependent.\footnote{Page, Scott, E. (2006) “Path Dependence”.
}\footnote{Bennett, Andrew and Colin Elman (2006) Complex Causal Relations and Case Study Methods”, p. 251.}


**Figure 5: Mechanisms and types of path dependency**

<table>
<thead>
<tr>
<th>Mechanism or Type of Sequence</th>
<th>Diagram of Sequence</th>
<th>Example</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increasing returns</td>
<td>A → A → A → A → A</td>
<td>QWERTY</td>
</tr>
<tr>
<td>Negative feedback (where A is the recurrent equilibrium)</td>
<td>A → B → A → D → A</td>
<td>Westphalian state system</td>
</tr>
<tr>
<td>Reactive sequences</td>
<td>A → B → C → D → E</td>
<td>King Assassination</td>
</tr>
<tr>
<td>Cyclical processes</td>
<td>A → B → A → B → A</td>
<td>Politics of Abortion</td>
</tr>
</tbody>
</table>

This chapter has highlighted the constellation of theories that I use in following chapters to examine the origins and development of Danish and Swedish socioeconomic, political and cultural integration policies. Each stage of the policy process is linked to one or a combination of relevant theoretical approaches. For agenda setting, Kingdon’s policy streams theory is particularly suitable given that, as I suggest, both Danish and Swedish policy making were essentially the product of local processes and not policy transfer from abroad. Following Kingdon, I seek to answer three relevant questions: did the cultural integration of immigrants become the subject of a contested and public debate? Was a policy solution available? Did a contingent event alter the political environment?

Combined together, Erik Bleich’s model on gatekeepers and their structures, Sheri Berman’s perspective on the action of carriers and Ellen M. Immergut’s veto point analysis on the impact of decision making structure provide the theoretical scope needed to unpack the decision making process which led to the adoption of Sweden’s cultural integration policy and its avoidance in Denmark. Looking at the political behaviour of policymakers in government and parliament and the structures of decision making through these theoretical lenses, one should be able to ascertain if the agency of Olof Palme mattered more than structures. All these questions are turned into conditions or “variables” which, with the help of the CsQCA form of the Configurational Comparative Method and both the logic of correlation and the logic of process tracing as elaborated in the Introduction, produce an end-product—a truth table which is applied to empirical data in Chapter Five.

The second set of theoretical approaches corresponds to the policy execution and reproduction phase. That is, how both countries applied and kept the same policy orientation. Regarding policy implementation, I explore Pressman and Wildavsky’s ‘top-down’ approach and Lipsky’s ‘bottom-up’ approach, the two paradigmatic works on the topic. I also give consideration to the functionalist approach advocated by Rothstein and Christina Boswell. The aim is not to ascertain the reasons for policy failure, but to identify the institutional design used by the two countries in implementing their socioeconomic, political and cultural integration policies. Do they conform to Yasemin Soysal’s regimes of incorporation? Were their socioeconomic integration policies functionalist as I argue? Which form did their cultural integration policies take? ‘bottom-up’, ‘top-down’, or both?

Path dependence, namely two of its four mechanisms—constraint and closure, is used to examine how these policies were kept. Closure is the gradual elimination of other policy alternatives. One should find evidence in the examination of each country’s policy that a multicultural policy in Denmark and an assimilationist policy in Sweden became obsolete over time. The main mechanisms of constraint are increasing returns, reactive sequences, cyclical
processes and negative feedback. In my view, a reactive sequence and negative feedback offer better explanatory lenses for examining continuity in Danish and Swedish cultural integration policies over time given their policy developments. These theories of policy continuity are applied to empirical indicators in Chapter Six.
Chapter 3: Historical Background: Danish and Swedish Integration Policies, 1850-1960

From the mid-19th century\textsuperscript{490} to the end of the 1950s, when guest workers or non-Nordic workers became their main source of immigration, Denmark and Sweden underwent the same migration movements, except for the second half of the 19th century when Sweden was marked by emigration to Denmark rather than immigration because of its unfavourable economic situation. First, there were seasonal workers from Galicia, a region straddling current Eastern Poland and Western Ukraine between 1900 and 1930, to work on the beetroot farms. Then, before and after the Second World War, there was the arrival of Jews, and other refugees and asylum seekers fleeing for safety. During and after the Second World War, Denmark and Sweden progressively opened their borders to other Nordic workers, culminating in the creation of a common labour market on 1 July 1954.

The timing of these issues on their political agendas differed until the coming to power of the Social Democrats in Sweden in the 1930s. Between 1850 and 1900, Danish policymakers established control measures to secure peace and order with the passage of the Law on the Control of Foreigners and Travellers in 1875. In Sweden, which was economically poorer than Denmark at this time, policymakers took measures aimed at discouraging emigration.

During the second phase, 1900 to 1920, Danish policies dealt first with the improvement of migrant workers’ labour conditions through a 1908 law. In Sweden, the first law passed in 1914 was geared toward issues of peace and order. However, the second law passed in 1927 harmonized the conditions of residency and improved both the working conditions and immigrants’ access to social protection.

In the 1930s, with the Social Democrats in power in both countries, the new social welfare laws were expanded to immigrants. From 1940, after the Nazi invasion of Denmark,

Both countries abandoned all the racialized policies which had targeted Jews and Travelling groups. They moreover sought to consolidate immigrants’ and refugees’ rights by signing various international human rights instruments. They also reinforced the socioeconomic rights of post-war labour migrants by giving them the same entitlements in terms of wages and social welfare protection as native workers, and experimented on an ad hoc basis with different systems of reception of refugees.

This chapter argues that authorities in both countries, generally, had the same policy background regarding integration issues prior to policy divergence in the late 1960s as warranted by my research design, MSDO (Most Similar, Different Outcomes). They continuously imposed two main duties (employment and self-help) for the purpose of accumulation (state interests). They also awarded the same body of rights to immigrants through piecemeal legislations mainly as a result of the actions of pro-immigrant activists, and the impact of controversial affairs and international human rights instruments.

The content of these policies is in line with the claim that I make in the following chapter as does Martin Bak Jørgensen - for the period starting from the 1980s – that the two countries’ socioeconomic integration policies have primarily focused on their interests. It adds new evidence to a growing body of studies such as Thomas Janoski’s statistical study of 18 Western countries over 36 years using twelve indicators that make such claim.\footnote{Janoski, Thomas (2010) \textit{The Ironies of Citizenship. Naturalization and Integration in Industrialized Countries}, New York: Cambridge University Press.} This is contrary to the long-held argument introduced by Rogers Brubaker that, criteria of naturalization rather than the mode of acquisition of citizenship may explain the behaviour of a government toward immigrants. Brubaker considered \textit{jus sanguinis} (citizenship by descent) as the core principle of the ethno-centric model and \textit{jus soli} (citizenship by birth on the territory) as that of civic nationalism. The rates and conditions of naturalization set by each country only came to “reinforce this difference.”\footnote{Brubaker, Rogers (1992) \textit{Citizenship and Nationhood in France and Germany}, p. 81 and p. 119.} Sweden and Denmark primarily apply \textit{jus sanguinis} yet the criteria of naturalisation have always been more restrictive in Denmark than Sweden as the last controversy over the adoption of dual nationality in the years 2000 showed.

I show in addition that national factors, not only the international human rights instruments and ideology born after World War 2, shaped the civil and social rights that were awarded to immigrants in the absence of multicultural policy. These include the 1875 Agreement between Denmark and Sweden on the deportation of Swedish guest workers, the action of national civil rights activists such as Eliel Löfgren in the 1910s in Sweden, the advent of social democratic parties with their welfare state projects in the late 1930s against summary...
deportation of immigrants, the horrors of the Holocaust and the exclusion of Jewish refugees. Neither state awarded cultural or political rights to immigrants. Yet they followed marked cultural policy trends which were nationalist and assimilationist by default. Each of the periods cited above corresponds to a section of the chapter. I use “hypotheses and generalizations”, a form of process-tracing, to provide a general account of each policy phase.

3.1 1850-1900: Peace and Order in Denmark and Emigration Controls in Sweden

The first three decades of this policy phase were dominated by security and national identity issues in relation to Swedish immigrant workers, the birth of the Danish state and ethnic irredentism in the Duchies of Schleswig-Holstein. Swedish authorities then, sought to prevent a massive emigration due to a poor economic situation.

3.1.1 The Danish 1875 Law on the Status of Aliens and Travellers

In January 1848, radical groups started to agitate in favour of a new constitution, which was meant to introduce democratic reforms, deepen the integration of the mainly German-speaking duchies in the kingdom, and—with regard to foreigners—strip the king of his power of naturalization in favour of the parliament. Riots against the constitution broke out in the duchies and the central government’s attempt to quell the revolt led to a fully-fledged war involving neighbouring Prussia. At that time, there was no unified German state just many principalities of which Prussia was the most powerful. Denmark was a multicultural state with Norwegian and German speakers recognized as full subjects. Citizenship had been introduced as early as 1776 through an ordinance “Indfødts-Retten forordningen” as part of the king’s decision to restrict access to royal positions to ethnic Danes. Furthermore, it was limited to the nobility and the bourgeoisie, with the country being an absolute monarchy.

Hostilities lasted until 1851 when a fledgling peace accord was signed. Nevertheless, the Danish constitution was adopted in 1849, creating the country’s first democratic

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493 The law on naturalized citizens was published three times a year. Since 2002 the law has been published twice a year. See Steffensen, Torben (1991) Lov om dansk indfødsret med kommentarer, København: Jurist- og Økonomiforbundets Forlag.
494 Absolutism was introduced in 1660 under the reign of King Frederick giving him sole power of decision over state affairs. The kingdom was then a conglomerate. It was unified with Norway and its possessions, the Faroe Islands, and Greenland in 1380. But in 1815, as a result of the French-British War during which, it had sided with France, (the losing side) Denmark was forced to cede Norway (but not the Faroe Islands and Greenland) to Sweden which was among the victors. It was also composed of the duchies of Schleswig, Holstein and Lauenborg. Northern Schleswig was mainly inhabited by Danish speakers but the other duchies were inhabited by German speakers.
institutions. In 1863, disputes over the line of succession in the duchy led to renewed hostilities which ended with the defeat of Denmark in 1864 and the loss of Schleswig, Holstein and Lauenborg to Prussia. As a consequence, in 1866, the criteria for naturalization were tightened.

According to Anna Frøsig, the defeat of 1864 is to Denmark what the Battle of Kosovo Polje is to Serbia: a national trauma that became one of the mechanisms of its national identity. While in 1776 the German-speaking inhabitants of South-Schleswig and the inhabitants of current Norway were considered as the sons and daughters of the soil, “landets egne børn”, in 1866 after a change in the citizenship law, only those who could speak the Danish language and upheld cultural practices could be naturalised.

In this regard, Frøsig explains, language became another mechanism or building-block. As with the French Republican model discussed in the first chapter, regional dialects were suppressed in favour of the national language. It embodied the national soul and marked the “boundary” in the word of Fredrik Barth between those who belonged and those who did not.

The statistics in the table below on the number of foreigners, published by Statistics Denmark, the national statistics institute in 1885, shows clearly that all the inhabitants of the old duchies and Norway were now considered foreigners like the Swedes and Germans. While individuals from dependencies such as Greenland, the Faroe Islands and the Danish Virgin Islands, which were bought by the USA in 1920, were recognized as citizens, they are included in a different category which means that they were viewed differently from “ordinary” Danes.

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495 The peace agreement, the Protocole of London, was signed under the auspices of Great Britain. In what amounted to preserving the status quo, the duchies remained under Danish sovereignty but their status was elevated to the same level as other regions of the Kingdom. After the death of the childless King Christian III in 1863, the central government sought to introduce the principle of female succession in the duchies in order to prevent the German Duke of Oldenburg from becoming successor and thus putting the duchies under Prussian rule. This led to renewed hostilities and the beginning of the Second War of Schleswig-Holstein and the subsequent territory losses. Northern Schleswig, however, was regained in 1920 after a referendum.
The third mechanism of this national identity was school education, historians, and priests who were in charge of perpetuating that memory. Grundtvig, the main intellectual figure and theologian of that time, is credited with creating the concept of “Danishness” and the fixation of what is Danish: one nation, one language, self-determination, self-government and freedom.

In his book, ”Dansk kultur” (Danish Culture), Søren Krarup, a Lutheran priest and intellectual who casts himself as an heir to Grundtvig and has led the fight against multiculturalism and immigration in Denmark since the mid-1980s, summarizes Grundtvig’s

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500 Ibid., p. 19.
502 He is also a founder of The Danish Association, “Den Danske Forening”, a nationalist pressure group and is a member of the far-right Danish People’s Party.
thinking in one sentence: "Danish first, then Christian."

He concludes that Denmark is lucky that a figure like Grundtvig, who could stir up those nationalist feelings, emerged, so much so that the Danish people survived the loss of Norway to Sweden in 1815, the uprising of Schleswig-Holstein in 1848 and the loss of South-Schleswig in 1864 to Prussia. During the same time, the country was undergoing profound socioeconomic change.

A labour shortage had developed in the agricultural and industrial sectors. The cultivation of beetroot had just been introduced and as its farming period occurred outside Danish farmers’ usual work cycle, additional labour was required. Industrialisation had also begun and the construction of railway networks and the running of factories demanded a manpower that employers found hard to obtain. Native Danes were employed in “more prestigious sectors” such as railway construction.

Owing to poorer economic conditions in Sweden and the prevailing regime of a free population movement in Western Europe, thousands of Swedish labourers had emigrated in search of higher wages and better job opportunities. But some politicians alleged that vagrants, beggars, Romas and swindlers had infiltrated Denmark on the same occasion and were the source of social ills. Most politicians were worried about the impact of these developments on peace, order and the social system.

As such, in 1866 an amendment allowing for the deportation of any aliens guilty of crimes was introduced in the Penal Code “Straffeloven”. In May 1875, the Danish parliament passed a new law on the status of aliens and travellers, “Lov om tilsyn med fremmede og rejsende”. It mostly dealt with issues of peace and order and was the first of its kind among Nordic countries. But in reality, it was intended to enable the deportation of immigrants who had become destitute or lacked proper identity papers. This law institutionalized discrimination and differential rights. Swedish workers were mandated to carry a residence book “Opholdsbog”. Jews were mandated to be in possession of a “transit letter.” Catholic Jesuits as well Danes who had converted to a religion other than Lutheranism were required to hold a special permit.

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505 Ibid., pp. 43-44.
507 The influx was particularly strong in the agricultural regions of Lolland-Falster, Bornholm and North Jylland. Willerslev, Richard (1987) “Tilvandringen af svenske arbejdere 1840-1918” in Blüdnikow, Bent (ed.) Fremmede i Danmark: 400 års fremmedpolitik, Odense: Odense Universitetsforlag, p. 120.
Only foreigners who held a job or a job offer were allowed into the country. If they were dismissed or fell into poverty within the first 5 years of their period of residency, they were deported. Whereas the law received the support of conservatives, liberals opposed it arguing that it was inhumane. Conservatives retorted that it was even more inhumane to let vagrants come into the country.\textsuperscript{510}

The implementation of the law had drastic effects on two groups. While control was gradually abolished for Native Danes because of the discontent it generated among them, its effects on foreign workers and German speakers from the old duchies were debilitating. By linking residency to employment, foreigners were constantly under the threat of expulsion. This led to a system of widespread abuse and arbitrariness. Employers often withheld foreign workers’ wages and rarely provided them with decent working conditions while they lived in squalor. It was common to see families, men and women sharing a room without a heating system and have to sleep in bunk beds. While, according to the law, Swedes and other foreigners became eligible for welfare assistance respectively after twelve years of residency in Denmark and five years of residence in a given commune, they were hardly ever offered such social protection.\textsuperscript{511}

Investigations carried out by police into complaints against foreigners were so flawed that in one instance, the Copenhagen police chief decided to conduct them himself.\textsuperscript{512} Travelling groups (Tatars, Romas) were special targets and the police were asked to “keep an eye on them”.\textsuperscript{513} German-speakers from the old duchies who had retained their Danish citizenship were not given residence in any commune because these communes feared the German-speakers would become destitute and would need social protection. Police were instructed to contact Prussian authorities to negotiate their return.\textsuperscript{514}

\textbf{3.1.2 The 1888 Agreement between Denmark and Sweden on the Deportation of Swedish Destitutes}

In 1888, the summary deportation of a group of Swedish workers provoked an outcry in the Swedish parliament leading the government to issue a formal diplomatic protest. As a consequence, Danish parliamentarians requested a reluctant government to negotiate a solution with the Swedes. Eventually, both countries signed a memorandum of understanding,\textsuperscript{515}

\textsuperscript{511} Ibid., p. 4.
\textsuperscript{512} Ibid., p. 10.
\textsuperscript{513} Ibid., p. 11.
\textsuperscript{514} Ibid.
The two governments agreed that the Danish administration would be responsible for the expulsion of Swedes who had fallen into poverty and had lived in the country for fewer than 5 years, while a special procedure through the Danish Ministry of interior and diplomatic channels would be needed for those who had resided for a longer period of time. Although this agreement was partly accidental, its significance cannot be underestimated because it established a legal precedent: the idea that immigrants were also rights bearers, particularly the right to due process. It also introduced a modicum of fairness in the procedure of deportation since the length of residency in the country became by itself a source of rights.

However, there were many other outstanding issues, notably immigrants’ dismal working conditions and their exclusion from social protection as illustrated by the Poor Law “Lov om det offentlige Fattigvæsen” of 1891, which barred non-citizens from receiving state welfare assistance. The new restrictive citizenship law of 1893, “Lov om indfødsret”, was also adopted amid suspicions that the rise in citizenship applications was motivated by foreigners’ desire to receive social welfare.

In 1898, the same restrictionist view led the parliament to change the principle of citizenship from *jus soli* (citizenship acquisition by birth on the territory) to *jus sanguinis* (citizenship acquisition by descent). In the mind of Danish policymakers, welfare assistance ought to be a rare occurrence. An unemployed person was a source of concern and viewed as a potential criminal. Foreigners were the last persons they wanted to have on their payroll. Thus foreign workers had no rights but only the duty to work.

Sweden was then a sending rather than a receiving country. This great period of emigration according to Sune Åkerman occurred in four stages: the beginning (1850-1869), the development (1870-1883), the turning point (1884-1892) and the regression (1893-1930). State policies such as the possession of a passport while travelling inside and outside the country, were geared towards controlling emigration mainly to North America, other

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515 The whole title of the law is: *Bekjendtgørelse angaaende en mellem Danmark og Sverige afsluttet Overenskomst angaaende det ene Riges Undersaatter, som paa det andet Riges Omraade falde Fattigvæsenets til Byrde*.

516 Ibid.

517 *Lov om indfødsret, Landstingets behandling, Rigsdagstidende 1892-93.*


519 *Kungliga Förordningar 19 February 1811, Påbudet 14 augusti 1812, SFS 1860: 34 (kreüger). See also Hammar, Tomas (1964) *Sverige åt svenskarne. Invandringspolitik, utlänningskontroll och asylrätt. 1900-1932*, PhD avhandling, Stockholm: Stockholms universitet, p. 7. The Hammar dissertation is a mammoth study of the immigration policy of Sweden between 1900-1932. His work is outstanding not only for its breadth but also because he uses public policy perspectives in the days when the discipline was still in its infancy in Scandinavia.*
European countries\textsuperscript{520}, and Denmark then called the poor people’s America.\textsuperscript{521}

Indeed, most of these emigrants were poor peasants, the victims of land reform “\textit{Det laga skiftet}” and a drop in the price of rye following Russian and American imports, which led to displacements and famines between 1881 and 1887.\textsuperscript{522} Other measures concerning immigrants, such as the reciprocal repatriation agreement signed with Russia in 1860 and 1889, were aimed at getting rid of “outcasts”.\textsuperscript{523} These were foreign prostitutes, criminals, travelling groups and paupers who, it was feared, would overwhelm social services, and who were the object of discrimination both by the public and authorities.\textsuperscript{524} However, these control measures were hindered by prevailing ideas about free immigration which held that the free movement of Europe’s population was a factor enabling economic growth.

3.2 1900-1920: Better Working Conditions in Denmark, Peace and Order in Sweden

Between 1900 and the late 1920s, despite similar power configurations with Conservatives in power and Social Democrats in opposition, policy developments following the arrival of Galician guest workers differed. While Social Democrats and activists in both countries admonished their governments to provide better working conditions for immigrants, only the Danish government enacted such regulations. Their Swedish counterparts emphasized instead issues of peace and order. Yet, by continuing to expel immigrants who had lost their jobs or become poverty-stricken, the two States sought above all to preserve their material interests, accumulation.

3.2.1 The 1908 Danish Bill on the Working Conditions of Foreigners

At the turn of the century, groups of political refugees fleeing unrest in Russia and migrant workers from Galicia arrived in great numbers into both Denmark and the South West

\textsuperscript{520} There was a substantial emigration to Germany and Latin America but also in smaller numbers to New Zealand, Australia, Canada and the rest of the world. See Runblom, Harald (1976) “Swedish Emigration to Latin America” in Runblom, Harald and Norman, Hans (eds.) \textit{From Sweden to America - A History of the Migration}, Minneapolis: University of Minnesota Press and Uppsala: Acta Universitatis Upsaliensis, University of Uppsala, pp. 303-308.

\textsuperscript{521} Given the cost of the passage to America, the cheapest option for poor people was to cross over the border to Denmark. But Denmark offered also a “quick exit” option if their undertaking failed.

\textsuperscript{522} Carlsson, Sten (1976) “Chronology and Composition of Swedish Emigration to America” in Runblom, Harald and Norman, Hans (eds.) \textit{From Sweden to America – A History of the Migration}, Minneapolis: University of Minnesota Press, p. 125.

\textsuperscript{523} Hammar, Tomas (1964) \textit{Sverige åt svenskarne}, p. 9.

\textsuperscript{524} Morfiadakis, Emmanuel (1986) \textit{Sverige och invandringen}, p. 91. For a detailed account see Hammar, Tomas (1964) \textit{Sverige åt svenskarne}, pp. 67-71. The phrase travelling or itinerant groups refers to Gypsies, Roma, Travellers, and Tinkers who do not constitute an homogenous ethnic group but whose common characteristic is their lifestyle which entails travelling as a family. See Lucassen, Leo (1997) “Eternal vagrants? State Formation, Migration and Travelling groups in Western-Europe, 1350-1914”. 
region of Scania in Sweden, where the economic situation had improved. Owing to an increase in wages, Swedish workers no longer felt the need to emigrate to Denmark. Galician workers were employed as farm workers but also as strike-breakers especially in Sweden. According to Georg Nelleman, by 1914 more than 14,000 workers had arrived in Denmark. Some British workers were recruited as strike-breakers as well. This led to the further deterioration of working conditions. In 1905, during a session of the Danish lower court’s Finance Committee, Peter Sabroe, a Social Democrat and a journalist by profession, described the situation of these workers as a contemporary form of slave trade.

A parliamentary enquiry substantiated Sabroe’s claim, concluding that foreigners’ working conditions in Denmark would be unacceptable in the USA. Swedish labourers and leaders of LO Landsorganisation, the powerful labour union, objected to these practices on the ground that they “impeded the efforts of the Swedish labourers to build up their trade unions and improve their working conditions.” However, as Tomas Hammar writes, the Conservative government remained passive although an investigation carried out by the Swedish Board of Commerce in 1907 confirmed that Galician workers were exploited by business groups and depressed wages.

By contrast, in 1908, the Conservative government in Denmark brought a bill on the status of foreign workers before the parliament, “Forudsætningerne for Loven af 21. maj 1908 om anvendelse af udenlandsk arbejdskraft i landbruget”. The bill was passed without major changes. Inspired by similar policies in Germany and Poland, the law required the signing of a contract based on a template provided by the Ministry of Interior and written in Danish and German, at least 8 days after the arrival of guest workers in Denmark. The contract had to specify the period of employment and wage conditions, and the period of transport and cost from the country of origin. Employers were required to provide each worker with a payment slip and account, and give him assistance in case of illness. They also had to supply proper accommodation fitted with a heater, kitchen, and different bedrooms for men and women. A limited number of beds were allowed per room and these were not to be bunk beds.

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528 Ibid., p.165.
529 Hammar, Tomas (1964) Sverige åt svenskarna, p. 397.
530 Ibid.
Lastly, employers had to cater for house cleaning and maintenance. The police were mandated to operate a check, at the latest, one month after the arrival of guest workers. If a problem occurred between the two parties, this had to be referred to the police for mediation. If this effort failed, the police were required to undertake an investigation. An employer received a fine to be paid to the Social Welfare Bureau if he was found to have breached the law. However, the bill did not require employers to provide better pay, nor did it mention the possibility of labour organisations to conduct controls as the Social Democrats had requested.

Only three months later, on 20 November 1908, Thorvald Stauning, the leader of the Social Democrats, taking advantage of the Bulotti affair asked for a re-examination of the law. Bulotti, a Russian immigrant, had destroyed his employer’s property, killing a cow with an axe under the pretext that he had been cheated. In a separate incident, a pregnant immigrant woman had been assaulted with a stick and when her husband protested, he was equally assaulted. Stauning stated that in order to avoid recurrent acts of this kind, a translator, who would also act as a witness, should be mandated for the signing of a contract. The worker’s exact pay also should be mentioned on his or her wage slip. In addition, Stauning argued that employers must “cultivate” workers, that is, provide them with education. Yet, despite the improvement of their working conditions, foreign workers were still denied social welfare protection.

3.2.2 The 1914 Swedish Deportation Act

In Sweden, on three policy making instances (1906, 1909 and 1911) Social Democrats sought unsuccessfully to introduce motions aimed at taxing foreign workers. Eventually in 1913, the Conservative government introduced such a bill into the parliament, but Social Democrats withdrew their support for the legislation when they realized that it did not address the interests of native workers. They tabled their own bill requesting the “expulsion” of those foreign workers who accepted below normal wages and proposed another enquiry into the issue. Both proposals were rejected by the Upper House, “Förstakammar” in 1914. As a consequence, the final version of the Deportation Act, “Utvisningslagen” which was passed later that year, addressed only issues of peace and order.

The Act allowed the government to take exceptional measures in emergency

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532 Ibid., pp.166-167.
533 Ibid., p.167.
535 Hammar, Tomas (1964) Sverige åt svenskarna, p. 397
536 Ibid.
537 Ibid.
situations.\textsuperscript{538} It forbade immigrants from engaging in any political activity or any activity whose nature was such that it would threaten public peace. Stockholm’s police were enjoined to inform immigrants about these prescriptions and expel them in case of violation.\textsuperscript{539} One case was the expulsion of Alexandra Kollontay, the daughter of a Russian general, who fled from Russia to Germany because of her political activities but who—upon the outbreak of WW I and hostilities between both countries—sought refuge in Sweden. In November 1914, she joined the editorial team of a newspaper \textit{Försvarsnihilisten} (The Defensive Nihilist) where she wrote spirited articles against the war and levelled many criticisms against German Social Democrats. Although she had avoided any interference in Swedish politics, she was accused by the secret police of political agitation. Despite the objections from the Congress of the Social Democratic Party and its leader, Hjalmar Branting, she was deported.\textsuperscript{540}

Nevertheless, the Act forbade the removal of foreigners on any grounds except those stated by the law and provided a right of appeal.\textsuperscript{541} It also guarded against the expulsion of anyone to a country where she or he could face political persecution or be expelled, or that was far-flung, due to the practical constraints involved in such a voyage.\textsuperscript{542} This latter provision was the result of intense lobbying exerted by a group of activist lawyers led by Eliel Löfgren after the arbitrary expulsion of some long-term residents notably Wolf Mellin. A well-established Jew, Mellin had served 17 years in prison and thereafter had been deported following a casual street fight without a proper investigation by the police. Löfgren and his peers, although allied with the Social Democrats, continued to lobby and negotiate with the Conservatives after the former withdrew their support for the bill.

Although it might have appeared as a side issue for lawmakers, this provision was an important precedent. Firstly, as with the agreement signed between Sweden and Denmark in 1888 about the expulsion of Swedish workers, it signified that once admitted to a country, foreigners became bearers of certain rights such as the right to fair process. Secondly, the exceptions attached to the law amounted, to a large extent, to the principle of \textit{non-refoulement}. As we know it today this principle “states, broadly, that no refugee should be returned to any

\textsuperscript{539} For a short but detailed account of these restrictions as well as the arrests by the police see Nelhans, Joachim (1987) (2.a) \textit{Utlänningsrätt. En handledning om utlänningsens rätt att inresa, vistas och arbeta i Sverige enligt 1980 års utlänningslag}, Lund: Studentlitteratur, pp. 14-15.
\textsuperscript{540} Tomas Hammar gives a good account of these expulsions. For the case of Kollontay, see Hammar, Tomas (1964) \textit{Sverige åt svensknarna}, pp. 234-238. For other expulsions, see Hammar, Tomas (1964) \textit{Sverige åt svensknarna}, pp. 233-308.
\textsuperscript{541} Ibid.
country where he or she is likely to face persecution or danger to life or freedom”.\textsuperscript{543} Although this was not the first codification of such a principle, as some members of the League of Nations agreed to such an arrangement in 1928, the Swedish Act was one of the earliest.\textsuperscript{544}

In 1917, during the First World War, the government used the provision on emergency situations of the 1914 Deportation Act to impose a visa and passport control on foreigners which had been removed in 1860. It effectively started a period of immigration restriction that lasted until 1943. In 1918, even as the war ended, a new royal ordinance on the control of aliens “Angående övervakning av utlänningar i riket” was passed, formally requiring foreigners to be in possession of a residence permit, “Uppehållsbok” commonly called “ubok”. An exception was made for Nordic citizens for whom a passport was nevertheless necessary.

With the onset of the Depression and the passage of the US Immigration National Act in 1924 that limited European immigration to the USA, Sweden was confronted with a potential influx of German immigrants.\textsuperscript{545} In order to protect its labour market, the country tightened immigration rules.\textsuperscript{546} The issuance of a visa was now linked to the immigrant’s own economic welfare including his or her housing situation and the job market situation for natives. When a work permit was issued in addition to an entry visa, it was awarded only for a specific and permanent job, and only after consultation with employers’ organisations.\textsuperscript{547} Immigrants who were not in possession of such a visa or passport would be deported by the police.

### 3.3 1920s-1940: The Expansion of Social Protection to Foreign Workers and Racialized Policies

The advent of Social Democrats to power in the early 1920s in both countries gave them the opportunity to implement the social policy reforms that they had advocated in favour of both the local population and immigrants. However, authorities maintained their emphasis on work. During the Depression, they restricted German immigration in order to protect their national labour markets. During the Second World War, Sweden, which unlike Denmark and Norway had not been invaded by the Nazi regime, used refugees to fill up shortages in several

\textsuperscript{544} Ibid., p. 70.
\textsuperscript{545} The US Immigration Act of 1924 set a quota system based on nationality which had the effect of limiting European immigration. It was repealed by the Immigration Act of 1965. For a broader examination of return immigration to Sweden see, for example, Persson, Magnus (2007) Coming Full Circle? Return Migration and the Dynamics of Social Mobility on the Bjäre Peninsula 1860-1930, PhD Dissertation, Lund University, Lund.
\textsuperscript{546} Nelhans, Joachim (1987) (2.a) Utlänningsrätt, p. 18.
\textsuperscript{547} Ibid., p. 17. Morfiadakis, Emmanuel (1986) Sverige och invandringen, p. 92.
industries.

However, not all refugees were given admission. Jews were excluded because of the racial ideas which from the 19th century “gained larger adherence and science began to draw conclusions about the connection between physical traits and mind [and] Races and ethnic groups were ranked and their cultural state seen as an expression of inherited traits.”

3.3.1 The 1927 Swedish Law on Deportation and Employment Rules

In 1927, a fully-fledged bill, Prop. 1927:28 on the rules of residence of aliens “Lagförslag om utlännings rätt här i riket vistas” that encompassed previous changes was enacted. It was as much an immigration as an integration law in the sense that it set conditions for the attribution of entry visas for a stay of more than three months, and covered employment as well as the rules of deportation. It is considered by many scholars as Sweden’s first migration law. It was valid until 1932 after which it was renewed once.

As with the 1914 Deportation Act, the law stated that refugees should not be sent back to any country where they would be persecuted for their political opinion, where there is political strife or where they would not feel safe. But unlike the 1914 Act which gave the power of decision on deportation and expulsion cases to the police, this prerogative—as well as the issuance of residence permits—became that of a committee comprising a representative of the Ministry of Foreign Affairs, main political parties, the civil society and a “Swedish” lawyer. The investigation of each case was now led by the Social Welfare Board “Socialstyrelsen”, the powerful institution in charge of organizing the welfare state.

Upon reaching a decision, it was sent for approval to a special commission composed of three members, one of whom was required to be knowledgeable in judicial procedure and another in international law. In cases where there was no consensus among the members, the case was referred to the cabinet, which acted on the advice of the Minister of Justice for a final decision.

Compared to the provisions of the 1914 Deportation Act, the law introduced more safeguards against arbitrariness in the procedure of the expulsion of immigrants, notably concerning the role and actions of the police who had been decried for their alleged bias

550 The ordinance refers to any person of stature in the society who was knowledgeable of issues regarding foreigners.
against foreigners in general and Roma in particular. Another advantage was that it set clear
criteria for residency. Given their almost identical power configurations, this difference can be
explained primarily by the fact that Danish authorities had already dealt with issues of peace
and order.

3.3.2 The 1933 Danish Law on Public Welfare

As part of Thorvald Stauning’s welfare state project “Danmark for Folket” (Denmark for
the people) and the reform implemented by his Social Affairs Minister, Karl Kristian
Steincke, the social welfare regime was reformed in 1933. Four main laws were introduced:

- The first law, “Lov om offentlig Forsorg” (public welfare) replaced the previous
  Poor’s law by new public welfare legislation.
- The second law, “Lov om Folkeforsikring” (public insurance) dealt with medical
  insurance, sickness funds, disability insurance, child care and retirement pension.
- The third law, “Lov om Arbejdsulykkesforsikring” (work-related injuries) regulated
  working conditions.
- The fourth law, “Lov om Arbejdsnvisning og Arbejdsløshedsforsikring” created an
  unemployment allowance.

People could no longer be stripped of any citizenship right when they became recipients
of social aid. Insurance coverage including the newly created medical insurance was expanded
to all social groups (children, the elderly and disabled persons). On the issue of immigrants, the
Social Welfare Law of 1933, “Lov om offentlig Forsorg” required the Social Affairs Minister
to examine individually the cases of foreigners who had become destitute or who were not
covered by a contract, and to provide social help instead of deporting them systematically as
before.553

The basic allowance was two-thirds of the ordinary allowance given to native workers.
Foreigners who became destitute but who had lived in the country for more than 20 years
became eligible for a state pension. In order to prompt the involvement of local councils, the
State guaranteed the refund of any assistance allocated by local councils to immigrants until
their deportation or admission onto the state payroll.554

Although the Social Welfare Law did not address issues relating to equal wages, it was

553 Vested-Hansen, Jens (1987) “Forsørgelses Problemet i Fremmedretten” in Blüdnikow, Bent (ed.) Fremmede i
554 Ibid., pp. 200-201.
another major victory for immigrants’ rights after the adoption of measures aimed at the improvement of working conditions and the conditions of deportation. However, criteria of naturalization continued to be tightened. In 1935, a cap was first set on the annual number of naturalizations. Second, like in 1866 after the Second War of Schleswig-Holstein, applicants were required to speak Danish and share local beliefs and practices, in a sense, be culturally assimilated. Ove Korsgaard describes it as the confirmation of an ethno-nationalist conception of citizenship that started with the shift from *jus soli* to *jus sanguinis* in 1898.

After Adolph Hitler’s accession to power in 1933 and especially with Germany’s adoption of the Nuremberg Laws of 1935 and the Crystal Night of 1938, leftist politicians, homosexuals, Roma and—above all—Jews sought desperately to leave Germany. But as Gil Loescher writes: “Wherever they went, Jewish refugees encountered a world that was closing its frontiers and reducing its immigrant quotas. The pervasiveness of anti-Semitism worldwide made immigration almost impossible for Jews fleeing the Third Reich.”

### 3.3.3 The Adoption of the J Pass in 1938 in both Countries

In 1938, Sweden and Denmark adopted the “J pass”, a special passport established by German authorities bearing the J stamp meaning “Jew” which was meant to distinguish German Jews from other Germans with the purpose of barring them from entry into their countries. Danish and Swedish authorities issued notifications to border agencies and embassies which advised against the admission of any person who did not intend to go back to his or her country, who was not economically self-sufficient or who had no ground for family reunification.

Since Jews could only obtain a permit to leave Germany if they pledged not to return, were being deprived of their possessions and had very few family links or racial kinship with

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559 There is a long-running academic dispute over whether the J Stamp was the German authorities’ own initiative or if it was established at the request of Swiss and Swedish authorities who wanted to identify more easily Jewish Germans at their borders. Swiss authorities applied the same measure.
Swedes in the sense that they were not “Aryans”; most of them were turned back at the border. Policymakers in both countries were imbued with the same ethno-nationalist and racialist ideas manifest through the practice of eugenics, which considered Tatars, Roma, Jews, the native Saami in Sweden, and the aboriginal Inuit and Greenlanders in Denmark as inferior.

Sweden was the first country to implement an Institute of Research on Eugenics in 1921 in Uppsala and its first director, the physician Herman Lundborg, was the author of popular books and exhibitions on the topic. Saami were considered an aboriginal group with primitive manners so that they needed coercitively to be assimilated. According to Roger Kvist, from 1846 to 1971, the Swedish state “in practice created a system of institutionalized racism towards nomadic Saami [until] Saami organizations managed to force the Swedish welfare state to adopt a policy of ethnic tolerance beginning in 1971”. As Gunnar Broberg and Nils Roll-Hansen write “the Gypsies, numbering a modest 600 or so in 1945, were treated as a danger to the Swedish way of life.”

To these ideas were added “national interest” that raised further concern about the size and the nature of Jewish immigration. Hans Lindberg writes about Sweden that, commission members and members of the parliament reflected that “too great an influx of Jewish refugees would lead to tensions and a dangerous increase of antisemitic movements.” Indeed, as Broberg and Roll-Hansen assert:

The attitude toward immigrants was often negative in spite of - or due to - the fact that they were so very few. A notorious case was the negative stance taken by the Uppsala Students Union in a statement made in 1939 before the arrival of a small group of Jewish physicians. The students may only have been looking after their own interests, but it is hard to disregard the element of racism that was present.

Denmark was “the first European state to introduce national legislation concerning

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561 Ibid. A group of 500 Jewish children were admitted to Sweden in 1938 and 1939 thanks to Jewish community leaders but the government was reluctant to accept more children refugees. See Lomfors, Ingrid (1996) Förlorad barndom - återvunnet liv, PhD Dissertation, Gothenburg: University of Gothenburg.


563 Ibid.


eugenic sterilization in 1929.” Hans Uwe Petersen writes that between 1 July and 1 October 1938, only 55 out of 527 refugees were allowed into the country so that authorities could determine if they qualified for a permanent visa. 291 applicants were directly denied admission at the border. In order to obtain permanent residency, refugees needed to provide the guarantee that they would not seek social welfare.

Lastly, Germany was powerful and expanding. Swedish and Danish authorities feared that any attitude viewed as confrontational by the Nazi government might lead to the violation of their longstanding neutrality and territorial integrity. As a consequence, refugees who were allowed inside the country were forbidden to take part in any political activities against the Nazi regime.

Yet these authorities opened their borders to non-Jewish refugees and, in particular, to German Social Democrats. In 1936, the status of the refugee was redefined by the new Swedish Alien Act. While this status had been restricted hitherto to individuals accused of crimes of a political nature, it was now expanded to include people fleeing persecution on the grounds of their political opinion and their racial belonging unless national interests were jeopardized, as illustrated by the exclusion of Jews.

After Sweden’s decision to accept 200 refugees at the request of the British government and the Bureau International pour le Respect du Droit d’Asile et l’Aide aux Refugies, a private humanitarian organization, Denmark accepted 150 refugees from Czechoslovakia despite failing to obtain guarantees from the Bureau that their stay would only be temporary.

Once in the country, despite the opposition of the general public against the arrival of refugees and sometimes their own resentment, policymakers looked after refugees and shared the burden with charity organizations. The Mosaic, a Jewish religious society present in both

570 Ibid., p. 211.
571 Both countries stayed neutral during the First World War.
573 Denmark even received Social Democrats from the Sudetes, the German-speaking part of former Czechoslovakia occupied by the Nazis. Petersen, Hans, U. (1987) “Danmark og Hitlerflygtningene fra Czekoslovakiet 1938-45”, p. 229
574 Ibid., p. 295.
575 The Bureau had requested Denmark to take 250 refugees. Both countries had wanted guarantees that these refugees would go back to their countries. Many eventually re-emigrated to America. Petersen, Hans, U. (1987) “Danmark og Hitlerflygtningene fra Czekoslovakiet 1938-45” p. 216.
countries, provided assistance particularly to Jewish refugees while the national offices of the International Red Cross focused on the integration of other refugees.

In Denmark, for example, out of the 163 refugees (instead of 150) who arrived eventually from Czechoslovakia, 132 were taken in charge of by the State, and 31 by the Matteoti Committee, a non-governmental organization working in favour of refugees, of whom one was transferred to the Mosaic. “State refugees” were lodged in a military camp hospital in Ødense where they were provided with food, pocket money and lessons by a former German minister, a refugee himself. They were forbidden to travel out of Ødense and the surrounding region or to sleep outside the camp. However in December 1938, under an initiative taken by the Danish Esperanto Association, some of these refugees were allowed to be hosted by Danish nationals.

3.4 1940-1960: The End of Racialized Policies and the Consolidation of Refugees and Nordic Workers’ Rights

The Second World War also marked the end of racialized ideas which had plagued minorities such as Jews, Saami, Tatars, Roma, Greenlanders and Inuit. The policy shift occurred with the invasion of Denmark by the Nazis in 1940. After the War, two main issues appeared on the agenda. On the one hand, there were the creation of the first international human rights instruments and their first implementation. On the other hand, there was the arrival of foreign workers mainly from Finland in Sweden to help sustain the country’s economic boom. Denmark’s economic boom would not start until the end of the 1950s and the beginning of the early 1960s.

3.4.1 The Occupation of Denmark in 1940 and the End of Indifference

On 9 April 1940 Germany occupied Denmark as part of its plan to invade Norway and control the North Sea to counter any invasion by the allies or Russia. Although Denmark had lost its sovereignty, the Nazi regime kept in place all its government structures including the royal family. Therefore there was a less brutal rule of occupation than in some other countries known as the “policy of cooperation” or *occupatia pacifica*. The Nazis set up a list of wanted persons but very little effort was made to apprehend them. They considered Danes and

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577 Ibid., p. 230.
Norwegians as fellow “Aryans.” Denmark was also an important source of food and possessed other services that the Nazi regime wanted to preserve. 

As for the Danish authorities, “faced with the presence of German military strength [it] set about finding ways to accommodate the invader as well as to assure the safety and continued comfort of [their] own citizens.” For ethnic Danes, foreigners and Jews, whether Danish or not, life continued with some normalcy. For example, foreigners continued to be eligible for social assistance and to have access to jobs.

On 29 August 1943 the first group of Jews was arrested in Denmark by the Nazis and sent to the concentration camp of Theresienstadt near Prague in the former Czechoslovakia. Occupation forces planned to round up Jews and send them to extermination camps in the following months. But the news was leaked out and almost all of the country’s 7,000 Jews were evacuated to Sweden on 1 October 1943 thanks to vast support from other Danes. This support was so strong that, according to a widespread legend, King Christian X himself wore a yellow star as a sign of solidarity. The government ceased all collaboration with the Nazi regime and acts of sabotage occurred all over the country.

The King made sure that the 464 Danish Jews who were captured and imprisoned in Theresienstadt received better treatment. They were also freed earlier thanks to the mediation of the Swedish Count, Folke Bernadotte, with Heimlich Himmler, a member of Hitler’s inner-circle and the head of the state intelligence which oversaw concentration camps. A Scandinavophile, Himmler had an interest in Scandinavian history and especially in the development of Runic scriptures in which the emblem of his organization “SS” was cast.

After the invasion of Denmark, Swedish policy started to shift in the words of Paul A. Levine, from “indifference to activism.” This policy change was due to Nordic solidarity and the fear that the Nazis may invade Sweden. In 1941 200 Jews were allowed to come to Sweden but only 6 succeeded in this attempt. The turning point, however, came on 1 October 1943, when the country gave an unconditional right to asylum to every refugee and granted a

581 Ibid., pp. 160-161.
582 Some 464 Jews were captured.
583 More than 700 crossings occurred without a single arrest. Many historians suggest it was done with the tacit acceptance of the occupying forces notably Werner Best, the Nazi governor. He is also said to be the source of the leak.
585 This “Nordicity” also explains the special treatment giving to Nordic immigrants. See Jupp, James (1997) “Creating Multicultural Societies: Australia, Britain, Sweden, and Canada”, p. 510.

In April 1945, the Ministry again sent a Swedish Count, Folke Bernadotte, then vice-president of the Swedish Red Cross, on a similar mission to concentration camps in Germany. More than 10,000 prisoners were ferried out through convoys of white busses carrying the Red Cross emblem.\footnote{Svanberg, Ingvar and Tydén, Mattias (1992) Tusen år av invandring, pp. 283-285. Hewins, Ralph (1950) Count Folke Bernadotte: His Life and Work, Minneapolis: Denison. For a critical perspective on Bernadotte’s actions, namely the preference given to Nordic Jews see Lomfors, Ingrid (2005) Blind fläck: Minne och glömska kring svenska Röda Korsets hjälpinsats i Nazityskland 1945, Stockholm: Atlantis.} By the end of the war, 185,520 refugees had arrived in Sweden.\footnote{Svanberg, Ingvar and Tydén, Mattias (1992) Tusen år av invandring, p. 285} The Sandler’s Commission, SOU 1946:36 “Betänkande angående flyktingars behandling”, created at the end of the war to investigate the government’s handling of Jews and other refugees during the war, concluded that it had been unnecessarily restrictive and the policy shift that occurred in 1941 came too late. However, this episode marks the end of the racialized system, which made Jews, Roma and Travelling groups the bane of Danish and Swedish policymakers and which was a black spot on the rights accrued to immigrants.

Throughout this period, both governments implemented job activation measures. Danish authorities gave authorisation to work to the first group of 163 refugees from the Bureau as soon as they arrived in May 1938 and designated the Matteotti Committee to assist them. A few years later, refugees were dispersed throughout Denmark in areas where there was a shortage of manpower and were guaranteed unemployment benefits.\footnote{Lomfors, Ingrid (2005) Blind fläck.} Facing a labour shortage and a potential decline of the coal industry, the Swedish government happily used Norwegian refugees, their skills and experience in timber production to revive the industry.\footnote{See Lundh, Christer (2005) Invandringen till Sverige. Stockholm: SNS Förlag, p. 67.} Although Sweden was a neutral country, the birthrate of its population had slowed since the 1930s\footnote{Myrdal, Alva and Myrdal, Gunnar (1934) Kris i befolkningsfrågan, Stockholm: Bonniers.} and a great proportion of men had been mobilized at the onset of the war to prepare for an eventual external attack.
3.4.2 The Reception of Finnish Workers, Post-war Refugees and the 1951 Geneva Convention

In 1946, a labour market study undertaken by a research institute linked to the industry, Industriens Utredningsinstitut concluded that the country would need between 100,000 and 200,000 workers over a period of 18 years. Without government consent, Swedish firms started on-site recruitment campaigns in other Nordic countries to the dismay of the authorities of these countries who themselves faced labour shortages, as well as of critics in Sweden who feared that the recruitment of these foreign workers would lower wages and worsen working conditions.

In 1946 the government set up a committee of enquiry tasked with finding the means to increase immigration in a controlled and ordered way. The committee proposed the signing of intergovernmental labour agreements which would be overseen by the Commission for Unemployment, Arbetslöshetskommissionen, known today as Arbestförmedlingen, the Swedish Public Employment Service (AMS). However, the two major trade unions, LO and Metall, the syndicate for industrial workers, flexed their muscles. As Jesper Johansson writes:

LO had an ambivalent attitude toward labour immigration in an expanding post-war Swedish economy. On the one hand the trade unions accepted that industrial growth and general welfare reforms were dependent on the labour supply. On the other hand, the LO feared that uncontrolled labour immigration would be a disadvantage for indigenous workers, since wages could be kept low and obsolete industrial sectors could be maintained and the “solidarity wage policy” could be endangered because of the influx of migrant labour. Organising the immigrants was a central part of the union movement’s strategy, and the LO also insisted from the very beginning on equal wages and employment conditions between indigenous and immigrant workers to avoid wage pressures.

Following a series of four negotiations with the government between 1946 and 1947, the planned agreement was transformed into a trilateral pact in which the labour unions, and LO in particular, held a virtual right of veto. The pact required a company to contact AMS for its labour needs and AMS thereafter, to consult regional labour offices and workers’

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595 The organisation’s full name is Metallindustriarbetareförbundet.

organisations. If the request was approved, AMS and the employer would then mount a joint-operation to recruit workers abroad.\footnote{Lund, Christer and Ohlsson, Rolf (1994) \textit{Från arbetskraftsimport till flyktning-invandring}, p. 72.} LO was guaranteed a say in any future decision on immigration.\footnote{Ibid., p. 71. Passport control already had been removed for Nordic citizens in 1945. In 1954, a common Nordic labour market was established; offering unfettered access to the Swedish labour market to any Nordic citizen including Danes. Therefore Sweden had already opened its labour market through bilateral agreements with most Nordic states. Its real importance for Swedish citizens was that they could now access other member countries’ labour markets.} This agreement materialized in the same year and later in 1948 was followed by the signing of labour agreements with Hungary, Italy and Austria.\footnote{Ibid., p. 26.} The power wielded by trade unions was in stark contrast to the situation in the early 1900s when they looked on impotently as employers and the Right-wing government imported Galician workers.

In 1951, another Swedish commission of enquiry, which had been at work on a new Alien Act since 1949, tabled its report urging a more liberal migration policy. It proposed the restoration of the free movement of people and recommended that the concept of refugee be extended to people who are not only persecuted on ground of their race and religion but who are also unwilling to go back to their countries for economic reasons. It also proposed that the same social and civil rights enjoyed by citizens be extended to immigrants with the right of residence. But some organizations, AMS in particular, expressed their opposition. The government itself viewed some aspects of the report as too liberal or “wishful thinking” and asked the commission to revise it.\footnote{Nelhans, Joachim (1987) (2.a) \textit{Utlänningsrätt}, pp. 25-26.}

The revised version was voted into law by all parties. The right of abode “bosättningsstillsändet” was replaced by an unlimited permanent resident permit “permanent uppehållstillstånd”. The definition of refugee was expanded to include asylum seekers who did not conform to the UN definition but were in need of protection. Furthermore, refugee status could be granted on humanitarian grounds and to draft avoiders and deserters.\footnote{Ibid., p. 26.} In a way Sweden went further than the United Nations Convention relating to the Status of Refugees which it signed in the same year with Denmark.

Denmark was not only one of its main proponents of the UN Convention but also the first country in the world to ratify it on 28 July 1951. The head of the Conference at which the Convention was drafted, Knud Larsen, a Dane was trotted out by his government. This activism in the United Nations circle became one of the best known features of Nordic Internationalism.

\footnote{The Protocol Relating to the Status of Refugees of 1967 removed the time restriction to events prior to 1 January 1951, thus becoming applicable to persons fleeing other conflicts around the world.}
Article 1, Paragraph 2 of the convention defined a refugee as a person who:

As a result of events occurring before 1 January 1951 and owing to well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group or political opinion, is outside the country of his nationality and is unable or, owing to such fear, is unwilling to avail himself of the protection of that country; or who, not having a nationality and being outside the country of his former habitual residence as a result of such events, is unable or, owing to such fear, is unwilling to return to it.

The Convention bestowed a large array of rights upon refugees and obligations on receiving states. In regard to the application of the Convention, Article 3 and 4 requested the contracting states to apply it without discrimination on the basis of race, religion or country and to provide the same freedom of religion for refugees given to their nationals. On the issue of their juridical status, Articles 13 and 14 asked these States to award them “treatment as favourable as possible and, in any event, not less favourable than that accorded to aliens generally in the same circumstances” regarding artistic rights, movable, immovable and industrial property. Concerning gainful employment, Articles 17, 18 and 19 of the Convention asked states to exempt settled refugees from measures taken to protect the national labour market and to give them the best opportunities for self-employment and access to liberal professions.

Articles 21 and 22 enjoined signatories to provide refugees respectively with the best access possible to housing and public education. Article 24 on working conditions and social security entailed that refugees be accorded:

(a) In so far as such matters are governed by laws and regulations or are subject to the control of administrative authorities: Remuneration, including family allowances where these form part of remuneration, hours of work, overtime arrangements, holiday with pay, restrictions on work, minimum age of employment, apprenticeship and training, women’s work and the work of young persons, and the enjoyment of the benefits of collective bargaining;

(b) Social security (legal provisions in respect of employment injury, occupational diseases, maternity, sickness, disability, old age, death, unemployment, family responsibilities and any other contingency which, according to national laws or regulations, is covered by a social security scheme).

The first test for the two signatory countries came in 1956 when some of the 200,000 Hungarians fleeing violence between the State Security Police (ÁVH) backed by Soviet soldiers, and various rebel movements following the uprising against the Communist regime, arrived. From 30 November 1956, about 1400 refugees landed in Denmark. The government
was confused about which course of action to take. As had happened during World War II, it enlisted the help of private relief organizations such as the Danish Red Cross, Caritas and Save the Children. In turn, these associations created an umbrella association, *Dansk Flygtningehjælp*, the Danish Refugee Council (DRC). Operating independently from the State, the Council was funded through donations of individuals and groups. A radio advertising campaign was launched in order to appeal for people’s financial contributions. It provided Danish language courses in Danish, housing, and assistance with job searches.

Unlike Denmark, Sweden witnessed an early intervention of the state in the reception of refugees. From 1944 to 1947, *Statens utlänningskommission*, the National Aliens Commission was in charge of immigration and the reception of refugees. Thereafter, *Arbetsmarknadskommissionen*, the future *Arbetsformedlingen*, AMS (Swedish Public Employment Service) became the main actor until 1980. The fact that refugees were under the country’s main employment agency is itself telling of the emphasis laid by the Swedish government on their self-sufficiency and accumulation. With regard to economic migrants such as Finnish workers, they were responsible for their own integration. Employers would help them where they found it necessary. However, the Finnish embassy in Stockholm opened special sections to help its citizens. Figure 6 below reproduces the policy trends and events which marked the development of Danish and Swedish socioeconomic and political integration between 1850 and 1960.

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603 Interview with Andreas Kamme, Chairman of the Danish Refugee Council, 4 February 2009.
Figure 6: Socioeconomic and political integration policy in Denmark and Sweden 1850-1960

1850--------------------------------------------- Emergence of modern nation-states

Swedish emigration to Denmark

Emigration controls in Sweden.

Peace and order (1875 Deportation Act), restrictions of naturalization criteria (1898).

Primacy of work and absence of social protection for foreign workers in Denmark.

\(\triangledown\)

1900--------------------------------------------- Arrival of Galician workers

Improvement of working conditions in Denmark.

Peace and order and improvement of the economic situation in Sweden

Primacy of work and absence of social protection for foreign workers.

\(\triangledown\)

1930--------------------------------------------- welfare projects, World War 2

Improvement of working conditions in Sweden

Extension of social protection to immigrants in both countries

End of racist ideas and primacy of work in both countries.

Further citizenship restrictions in Denmark (1935)

\(\triangledown\)

1945--------------------------------------------- End of World War 2,

Finnish labour immigration to Sweden

Beginning of non-Nordic labour immigration

Consolidation of socioeconomic rights and

adoption of the 1951 Geneva Convention by both countries.

\(\triangledown\)

1960--------------------------------------------- Non-Nordic immigration
3.5 Default Assimilation or the Absence of a Cultural Integration Policy

Unlike in their socioeconomic integration domain, one cannot find a record of past legislations addressing the cultural integration of immigrants prior to the 1960s. This is despite the existence of general cultural policy trends. Thus, until the end of World War 2, the two neighbours promoted a bourgeois and nationalist culture. In the 1950s and early 1960s, they sought to propagate the bourgeois culture to underprivileged classes, the democratization of culture. This nationalist orientation was even more accentuated in Sweden than in Denmark where a formal agreement on culture between political parties in the 1950s allowed both a national and an international labour cultural current.

3.5.1 A “High Culture” from the Middle Ages to the 1920s

One can distinguish four cultural policy orientations from the Middle Ages to the 1920s in Danish and Swedish cultural policy development. The first phase extends from the Middle Ages until the start of Reformation in the early 16\textsuperscript{th} century. During this period, culture was under the control of the Catholic Church. Cultural activities considered as pagan or pre-Christian such as dancing, trance and rituals were forbidden by the Church.\textsuperscript{606}

The second phase begins with the Reformation in the early 1500s\textsuperscript{607} and continues until the introduction of democratic reforms and constitutions in the first half of the 19\textsuperscript{th} century. During this period, the locus of cultural life in both countries shifted from the Catholic Church to the royal court where the monarch and his family became the patrons and beneficiaries of the arts. The role of artists was to legitimize absolutism in the eyes of the masses. In Denmark, the Royal Theatre, Kongelige Teater, was created in 1722 and funded by the King out of public coffers.\textsuperscript{608} Frederik V started in 1747 the construction of Frederikstaden, a district in the centre of Copenhagen named after him, and hosting the most ornate rococo palaces and works of


In Sweden, Gustavus III gave monopoly of cultural events to the Royal Theatre (The Opera House) and outlawed any private event.610

The third phase starts with the adoption of democratic constitutions respectively in 1809 in Sweden and 1849 in Denmark and lasts until the introduction of the welfare state in the early 1930s. During this period, culture spread from the royal court to the bourgeoisie, giving birth to a “high culture” or bourgeois culture controlled by the state. In Denmark, the responsibility for cultural affairs and institutions was transferred in 1849 to a new Ministry for Church and Education referred to as the Culture Ministry.611 In 1864, after the country’s defeat in the Second War of Schleswig-Holstein, a second cultural movement, the rural liberal culture, originating among landowners, appeared. It was, as Peter Duelund writes:

inspired by Grundtvig, the nation state and religion, afforded the Danish landowning class, whose political power had increased in step with its economic muscle, the opportunity to revitalise the otherwise practically moribund rural culture.612

However, Duelund adds—citing Jens Engberg—that the “rural liberal culture they sought to promote was not a counterculture in opposition to bourgeois culture. It was more of a parallel culture, separate from the culture of the bourgeoisie, albeit allegedly with the same objective, i. e. to promote national sentiment.”613

Cultural life in Sweden continued to be dominated by the bourgeois culture and its focus on the Royal Theatre except for the attempts of Erik Gustav Geiger (1783-1847) and Esaias Tegnér (1782-1846)614 to introduce new currents of thought. Geiger preached that impeding social changes will require the replacement of “the personality principle” or absolutism by the “association principle”, that is, more social solidarity and egalitarianism.615

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612 Ibid.
614 For biographical details on both intellectuals, see introduction.
3.5.2 1930-1960: The Primacy of a Bourgeois and National Culture Over a Worker’s Culture

After the accession to power of the Social Democrats in 1924 in Denmark and 1932 in Sweden, a worker’s culture appeared on their cultural agendas. In Sweden, this did not lead to a reversal of the cultural trend. As Tor Larsson writes, until after World War 2, there was no “cultural policy” as a separate administrative area. The concept was “non-existent” or rather not well understood. Cultural policy was equated to educational policy as illustrated by the first Social Democratic Minister in charge of Culture, Arthur Engberg, whose book “Demokratisk Kulturpolitik” (Democratic Cultural Policy) was published in 1936. In this book, he tackled educational reform rather cultural policy goals. Although there was a debate about an international worker’s culture, it was not as active as in Denmark. As Anders Frenander observes, its proponents “belonged to the left wing of the Social Democrats or to the Communist Party. They were not many and they were rather swiftly marginalised.”

In Denmark, Julius Bomholt, who had authored a book named Arbejderkultur (Workers’ Culture) in 1932, was commissioned to draft a cultural policy by the new social democratic government. He conceived a policy based on workers’ culture inspired from the International Labour Movement. This culture entailed “mutual solidarity, pride in the job, a special jargon, worker’s song and the trade unions” as opposed to the alleged individualism and exploitation of the bourgeois class. “Opera, ballet and bourgeois literature had to be considered damaging cultural activities.”

At the same time, a new cultural movement, cultural radicalism, was emerging. The ontology of cultural radicalism centered on the individual, the necessity of freeing him or her from the shackles of the society and its established norms and values, the promotion of free and rational thought, and still the preservation of a national culture based on “one people, folk and language.” This latter aspect reflected the ideology of Grundtvig’s, the author, priest and revered public figure who wrote about Denmark and Danishness in the aftermath of the country’s defeat of 1864. He drew much of his inspiration, according to Peter Duelund, from

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619 Ibid.
Johann Gottfried Herder’s romantic ideas. The Radical Liberal Party became the main promoter of this current.

However, this exclusionary policy line was reneged on by Social Democrats and Bonholm himself. This decision was the consequence of Thorvald Stauning’s “Danmark for Folket” (Denmark for the People) programme, the “Middle Way” strategy that, as described previously and, like in Sweden, aimed to mobilize all social classes and political parties around the social welfare project. In 1953, the new cultural policy orientation materialised with the publication of the report *Mennesket i Centrum. Bidrag til en aktiv kulturpolitik* (Focus on the Individual Citizen. Contribution to an Active Cultural Policy). As Julius Bomholt wrote, “the report was no socialist catechism akin to the pre-war belief in a worker’s culture. It was a real programme and ‘cultural improvement for all people’ was its aim, as the Prime Minister at the time, Hans Hedtoft, put it in the foreword to the report.”

Peter Duelund writes that “unlike the bunker mentality of the 1930s, when worker’s solidarity was seen as the most important pillar of cultural policy, the freedom message [had become] the most significant one.”

This compromise, “the Historic Compromise on Culture” was mainly the result of protracted negotiations between the Social Democrats and the Radical Liberals. Duelund adds:

The Social Democrats had relinquished the old dream of developing a worker’s culture. The social-liberal high-school democrats, the Radical Party, had acknowledged that self-organisation alone would not achieve welfare’s political goals. The State had to lend a helping hand, if the cultural objective of free and equal opportunity was to be realized.

The policy outcome or as Duelund puts it, “the price paid was that culture was now perceived and defined, first and foremost, as a national phenomenon.”

In Sweden, by contrast, there was no policy development of that kind. From the end of World War 2 to 1960, only two policy documents were published and none became the basis of a government policy bill. In 1946, the Communist Party published the first cultural policy

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623 The Radical Liberal Party was on the left in the 1960s. Today it has mutated into a centre-left party. It was founded in 1905 as a splinter group from the Current Danish Liberal Party (venstre)
624 See introductory chapter.
627 Ibid., p. 40.
628 Ibid., p. 39.
629 Ibid., p. 41.
document; a programme which aimed at the improvement of artists’ training and working conditions and reiterated trade unions’ concerns about the negative impact of commercialism on the publishing and film sectors. But as Frenander remarks, “when the author of the programme introduced it in the party’s theoretical journal, he used a vocabulary that invoked the ‘Swedish nation’ rather than the ‘working class.’” Unconvinced of the possibility of a worker’s culture, he wanted to “develop the best traditions within the national Swedish culture.”

In 1952, the Social Democratic Party published a report, “Människan och nutiden” (Man and Contemporary Times) on the general state of the society in which it advocated the adoption of a “broad, anthropological concept of culture.” But there also was a contending movement, the Peasants’ Movement. However, this movement was not directed against a worker’s culture as it was in Denmark and was unsuccessful. It wanted to safeguard the culture of the countryside which it deemed was threatened by the emerging modern culture or “the bad types of city culture.” Social Democrats agreed with some of the Movement’s criticisms but they were hopeful that the welfare state project would be able to offset them.

The figure below illustrates the frequencies and patterns observed in Danish and Swedish general cultural policy prior to the advent of multiculturalism on the agendas.

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630 Ibid., p. 39.
Figure 7: Cultural policy trends in Denmark and Sweden until the early 1960s

**Middle Ages**

Christian Culture (Catholic Church’s control)

\[\downarrow\]

*Early 16\textsuperscript{th} century* \----------------------------- \textit{Reformation}

Absolutist Culture (monarch’s control)

\[\downarrow\]

1809 and 1849 \----------------------------- \textit{Democratic Constitutions}

Bourgeois Culture (state control)

\[\downarrow\]

*Late 1920s-Early 1930s* \----------------------------- \textit{Social Democratic Regimes}

Nationalist and High Culture (state control)

\[\downarrow\]

1950s and 1960s \----------------------------- \textit{Welfare State Relaunch}

Democratization of High Culture (state control)

\[\downarrow\]

1968 \----------------------------- \textit{National Cultural Policy Projects}

Cultural Democracy (state control)

\[\downarrow\] \[\downarrow\]

Assimilation in Denmark  Multiculturalism in Sweden
Prior to the arrival of guest workers in the 1960s, Denmark and Sweden had awarded the same body of rights to immigrants quantitatively and qualitatively. These rights accrued gradually. Civil and social rights came first and featured prominently. The former were specifically rights to due and fair process, especially with regard to the procedure of deportation/expulsion. The latter were better treatment regarding working conditions, wages, and access to social protection. Foreigners were denied political rights namely political participation in democratic institutions and involvement in political activities in relation to their homelands.

However, the two neighbours also imposed similar duties on immigrants: employment and self-sufficiency. Until the social reforms introduced by social democrats in both countries in 1930s, this was an absolute requirement of entry and residence as, without employment, there were concerns that an individual may be implicated in criminal activities or become a social burden. Consequently, when a foreigner became destitute, he automatically became the object of expulsion. From the arrival of refugees onwards, governments themselves facilitated or devised ways for immigrants to find work.

Agenda setting and policy development in the two countries at some times differed and at other times followed the same course, mainly as the result of different socioeconomic transformations. During the first phase, 1850-1900, Danish and Swedish policies mostly diverged. Danish policymakers established control measures, to secure peace and order with the passage of the law on the control of foreigners and travellers of 1875. This followed a period of political instability marked by two defeats, territorial losses and a massive influx of Swedish migrant workers, which Swedish authorities had to contend with.

During the second phase, 1900 to 1930, the two countries were both impacted by the arrival of Galician workers. Danish policies dealt with the improvement of migrant workers’ labour conditions through the 1908 law. In Sweden, the first law passed in 1914 was geared toward issues of peace and order, and allowed the deportation of foreigners accused of involvement in political activity or vagrancy. In the 1930s, with social democrats in power in both countries, social welfare was expanded to immigrants. The Swedish Social Democrats, in addition, passed a flurry of laws formalizing the conditions of residence, overhauling and improving the rules of expulsion in order to “catch up” with Denmark.

The advent of the Nazi regime and the arrival of refugees fleeing persecution ushered in similar policies. In 1938, both countries ruled out the admission of Jewish refugees. From 1941 after the invasion of Denmark by the Nazi regime and the Holocaust, they abandoned the racialized policies which had sustained previous discriminatory practices toward Jews and Travelling groups. Moreover, they sought to consolidate these immigrants and refugees’ rights
by signing various international human rights instruments notably the 1951 Geneva Convention relating to the Status of Refugee.

They also reinforced the socioeconomic rights of post-war labour migrants by giving them the same entitlements in terms of wages and social welfare protection as native workers and experimented on an ad hoc basis with different systems of reception of refugees (dispersal over the territory, devolution to private association, burden sharing between states and association).

Citizenship acquisition in both countries was based on the principle of *jus sanguinis* although with a path to naturalization. Yet in Denmark, as opposed to Sweden, the criteria of naturalization were consistently restrictive. In Denmark, the formal demand of assimilation was made on the criteria of citizenship. This means that the politics of naturalization, rather than the citizenship principle as argued by Brubaker, may be the most important yardstick for understanding states’ citizenship policies.

Sweden and Denmark did not formulate any cultural integration policy despite the existence of clear cultural policy currents which were nationally oriented and geared towards higher social classes. However, unlike in Sweden, a cross-party agreement on the tenets of a cultural policy was reached between political parties in 1953. This Historic Compromise on Culture included three currents: international cultural exchanges upheld by the Social Democrats, individual freedom, and nationalism wanted by the Radical Liberals. This nationalist dimension, in particular, became a policy legacy which, as I demonstrate in Chapter 5, prevented the formulation of a multicultural policy.
Chapter 4: Danish and Swedish Socioeconomic and Political Integration Policies between 1960 and 2006: The Primacy of Work and Equality

The 1960s brought lasting change to the composition of the immigrant populations and integration policies in Denmark and Sweden. Whereas most immigrants after the Second World War had come from Scandinavia (Denmark, Norway and Finland) and the Baltic states (Estonia, Lithuania and Latvia), between 1960 and the mid-1970s, workers were recruited from Yugoslavia, Turkey, southern Europe, and—in addition for Denmark—Pakistan.

They were needed to fill persistent shortages in industry and became the main source of immigration. From the mid-1970s onwards, after the end of labour immigration in both countries, the majority of these immigrants stayed in either Denmark or Sweden and were joined by their families. They were soon outnumbered by refugees from the Soviet bloc and countries in the Third World. The most prominent groups were Vietnamese, Chileans and other South American refugees in the 1970s, Sri Lankan Tamils in the 1980s, Lebanese, Iranians and Iraqis in the 1980s, and Somalis and Iraqis in the 1990s and the year 2000.

However, as mentioned in the introductory chapter, there is both confusion in the object of study and little agreement over the nature of the two neighbours’ integration policies. Danish integration policy has variously been labeled either a mild form of multiculturalism mainly because of its apparent similarities with Sweden, or the product of a “laissez-faire approach” prior to 1999 because of the alleged absence of a formal policy, or ethno-nationalism. Sweden’s policy meanwhile has been described as corporatist, modeled as it is on the country’s universalist and statist welfare regime, while the “freedom of choice” goal

634 In most multi-country studies, Sweden is considered representative of Nordic countries. For a discussion, see Roth, Hans, I. (2006) “Om mångkulturalismens kritiker”, pp: 93-108.
of its 1975 Integration Policy (Prop. 1975/26)\(^{638}\) has been interpreted by some scholars as token multiculturalism,\(^{639}\) and by others as preparationism.\(^{640}\)

This chapter argues that the legislations, mentioned above as the countries’ token assimilationist and multiculturalist policies, have dealt overwhelmingly with socioeconomic and political matters, although as stated by Adrian Favell one can find “traces” of cultural integration policies therein.\(^{641}\) These socioeconomic policies were consistently based on two of the states’ regalian functions: accumulation and fairness. They sought primarily to tackle employment issues. As between 1850 and 1960, they continued to provide social and civil rights (equal treatment and opportunity) to immigrants. Similarly, few new political rights were given to these immigrants except the right to vote in local elections in Sweden after a 3-year period of residency.

Specifically, the policy frameworks formulated in the 1960s and 1970s - periods marked by labour immigration - sought to solve the problems encountered by immigrants in the workplace: language barriers, safety issues and so on. The policies that were formulated from the mid-1980s, the beginning of the “refugee crisis” and throughout the 1990s,\(^{642}\) intended to tackle joblessness and discrimination. In the 2000s, as the employment situation of immigrants remained dismal, both countries reinforced previous policies. In Denmark, the new right-wing government put pressure on immigrants to become pro-active in the job market.

With regard to political integration - citizenship, political representation, incorporation - I show that the same social and civil rights awarded to Western immigrants prior to 1960 were extended to non-western immigrants and even strengthened in some instances. However, with regard to Soysal’s tripartite model described in the Introduction, policymakers in each country tried various regimes of implementation at various times but met with limited success.

Prior to the 1990s, mirroring Soysal’s Corporatist model, the main actor in the incorporation of immigrants was a central state institution, *Statens Invandrarverk* (State Immigration Board), (SIV). By contrast, in Denmark, the Danish refugee Council, *Dansk Flygtningehjælp*, a federation of private associations, was in the driving seat in a scenario

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\(^{638}\) The other policy goals of the bill are “equality” and “cooperation”.


patterned after Soysal’s liberal model. However, from the 1990s onwards a double movement occurred. While in Sweden, local councils and private associations became active players in the implementation process, in Denmark, the state followed by local councils became the major actor.

As in the previous chapter, I use process tracing, namely “hypothesis and generalisations” to support this argument. I review the evolution of the countries’ legislations. It does not require a detailed analysis, yet it is not just a sum of policies. More consideration is given to landmark legislations by the way of content analysis.


4.1 Mid-1960s—Mid-1980s: Tackling Immigrants’ Problems in the Workplace

Government policy making aimed at the socioeconomic integration of immigrants started in earnest in the mid-1960s. Two main policy documents were produced: Report No 589 on the Situation of Guest workers in Denmark, and Sweden’s Prop.1975:26, Guidelines for an Integration and Minority Policy. Despite the former being a commission’s report and the latter, a fully-fledged bill, both documents focused on problems encountered by immigrants in the workplace and were implemented. As it is, they were finalized fairly late in the early 1970s as labour migration wound up. In 1972 as the economy slowed down and the oil crisis started to unfold, LO asked the Swedish government to stop labour immigration. In Denmark, the government, instead of trade unions, put a stop to labour immigration in 1973.

4.1.1 Prop. 1975:26, the Swedish Bill on the Guidelines on the Integration of Immigrants

In Sweden, long before the formulation of a policy in 1975, immigrants’ problems in the workplace were so acute that street-level actors literally took the “law into their own
hands”. Confronted in their daily interactions with guest workers with problems such as the lack of Swedish language skills and knowledge of workplace practices, Lands Organisationen (LO), the powerful confederation of trade unions, and Studieförbund, the Swedish Adult Education Association, initiated languages courses themselves. Then they successfully lobbied some local or regional councils, such as Eskiltuna, Malmö, Västerås, Borås, Stockholm and Uppsala. These from 1965 created different structures which will be collectively known as invandrarbyråerna (Immigrant Bureaus).

These bureaus were small units of two or three full-time employees and a few part-time translators, who often had no other training or knowledge than their ability to speak Swedish and one of the main immigrant languages. The bureaus were more or less incorporated into the organisational structure of the local councils and functioned merely as information centres where immigrants could obtain information and also be directed to social institutions appropriate for their needs.

In 1965, while a public debate on the situation of immigrants—which had started the year before—was raging, the Swedish Government set up a Taskforce on Integration, Arbestgruppen for Invandrafrågor led by Kjell Öberg, then Ambassador to China. Its main function was to supply information about immigration to the resident population, and about the Swedish society to immigrants, which it did through public information sessions, newsletters and brochures, including the long-lasting “Ny i Sverige” (New to Sweden). This is still mailed today to landed immigrants. However, the taskforce and its work were judged insufficient by intellectuals, such as Schwarz and like-minded activists, who urged the government to adopt a fully-fledged integration policy. They criticized these brochures for being targeted at companies, state agencies and associations rather than at immigrants, and being a Trojan horse for assimilationism.

In May 1968, the government moved to create a commission to investigate the socioeconomic situation of immigrants and national minorities and ways of facilitating their integration into Swedish society: Invandrar utredning. The commission produced three reports. A first report on the educational needs of immigrants SOU 1971:51 “Invandraruutredningen 1. Invandrarnas utbildningssituation. Förslag om grundutbildning i svenska för vuxna

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643 Many were accused of being willing to work extra hours and to accomplish every task possible, to gain as much revenue as possible.
644 Sarstrand, Anna-Maria (2007) De första invandrarbyråerna, pp. 50-64.
645 He will become over the years one of the most important architects of Swedish immigration policy.
"invandrare", was published in June 1971. It proposed the introduction of home language instruction, alongside Swedish for children whose home language was other than Swedish, to promote “active bilingualism”. The report cited new research which claimed that a good mastery of one’s home language would also improve the proficiency of immigrant children in the Swedish language. A child’s home language was also cited as important for the development of a child’s personality and the maintenance and preservation of immigrant children’s cultural heritage.

A second report on translation services and the Nordic Convention on Languages, SOU 1972:83, was published in 1972. The final report, SOU 1974:69 (main findings), and its annexes, SOU 1974:70, were published in 1974 and incorporated into a framework bill, Prop.1975:26, “Riklinjer för invandrar- och minoritetspolitiken” (Policy Guidelines for an Integration and Minority Policy). This was adopted by a united parliament on 22 February 1975 and was expected to last until the 1970s and 1980s.

In reality, the bill focused on immigrants’ socioeconomic issues although it was meant to explore national minorities’ issues and cultural matters as well. This may not be apparent because policymakers used interchangeably the terms “immigrants” and “national minorities” in some contexts, and differentiated them in others; except when one examines the policy’s three overarching policy goals: “Jämlikhet” (equality), “Valfrihet” (freedom of choice), and “Samverkan” (cooperation).

Equality meant that immigrants should have the same opportunities, rights and obligations as the native population. This would be attained through the provision to immigrants of the same amount and quality of employment, housing, social welfare and education services. The law also stipulated that Swedish society should give immigrants and their descendants the conditions to retain their own language, practice their own cultural activities and maintain contact with their countries of origin. Lawmakers also saw equality as having an international dimension in the sense that the interests of countries, from which immigrants were arriving, ought to be taken into account.

Freedom of choice entailed that minorities should be given the possibility to choose themselves “själv välja” to what extent they wanted to preserve and develop their cultural and

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648 Tre Decenniers modersmålssöd, Särtryck av rapport 228, Skolverket.
649 Prop. 1975: 26 om riklinjer för invandrar- och minoritetspolitiken m. m., p. 10.
650 Ibid., p. 15.
651 Ibid.
652 Ibid.
653 Ibid. International solidarity, it was claimed, required that if emigration was found to be detrimental to the economic development of a sending country, actions shall be taken in cooperation with the authorities of that country to create job opportunities in the regions most affected by emigration.
linguistic identities. As a result, when the need arises the state should put at their disposal economic and other means to help them achieve this. Preserving immigrants’ culture had the added advantage that if immigrants and their children chose to return to their land of origin, they would have fewer problems of integration.  

Cooperation signified that immigrants, national minorities and the resident population should work together. That is, their relationship should be based on principles of mutual tolerance and solidarity. Mutual tolerance meant the acceptance of each other’s ways even if they were disapproved of—unless they were harmful to the other group. The realization of this goal entailed firstly treating both minorities and majority as equal partners, then ensuring that minority groups take active part in the political process, the labour movement and decision-making about issues of particular relevance to themselves. Lastly, in order to prevent social conflicts, the law expressed the need to increase and improve the resident majority’s knowledge and predispositions toward minorities. Finally, it was asserted that where some aspects of the three goals had already been implemented, they should be reinforced.

The law further identified areas of interest or mechanisms of enforcement similar to those chosen in Denmark, even though they were fewer and ranked by order of importance. The first was employment. Owing to the higher than usual rate of workplace injuries among foreign workers resulting from poor language translation services and inadequate information about workplace safety, it was recommended that the Office of Labour Protection, Arbetsyddsstyrelsen and the State Immigration Board, Statens Invandrarverket jointly devise solutions to give more protection to immigrants workers. In addition, measures should be taken to encourage immigrant workers to play an active part in trade union activities.

The second area was housing. Lawmakers observed that immigrants, like other native groups of lower socioeconomic status (e.g. low-income earners, the elderly, large families), often lived in dilapidated housing conditions and had difficulties in securing good quality accommodation. The State Immigration Board, the Office of Labour Protection and the Housing Council were thus instructed to give special consideration to the situation of immigrants when dealing with disadvantaged groups. They affirmed that immigrants should

654 Ibid.
655 Ibid., p. 16. This was to be done by highlighting the points of common interest, increasing education and information on these minorities’ cultures and especially casting them in a positive light as illustrated by the work of the Task-force on integration since 1965. Cooperation included an international aspect. The law asserted that it is legitimate that countries of origin would want to maintain contact with their emigrants and that Sweden should facilitate these connections as long as they do not violate individual liberties or democratic rules.
656 Ibid., p. 17.
657 Ibid.
658 Ibid., p. 18.
be allowed to cluster with their counterparts shortly after their arrival in the country because this would facilitate their integration but not in the long-term, as the maintenance and building of a socio-cultural community were hinged on other factors.659

The third area encompassed social issues. Immigrant families were no longer required to show strong links to Sweden or to have stayed in the country for six months in order to be eligible for the state child support “barnbidrag”. Like Nordic immigrants, non-Nordic immigrants were awarded the right to the basic retirement pension, “folkpension”, after working in the country for at least three years.660 Legislators also encouraged the recruitment and training of bilingual social workers, medical and administrative personnel, as well as interpreters and translators. The need to inform immigrants about the working of the Swedish medical system was also emphasized. Health checks were not compulsory, but these would be discretionary upon, for example, joining the population registry or the social insurance system.661

The fourth area was education. The bill endorsed the conclusions of previous commissions of enquiry into Swedish language courses for immigrants, SOU 1971:51, and the training of interpreters and translators, SOU 1972:83. Based on research findings affirming the positive effects of bilingualism, it introduced voluntary home language classes for immigrant children from the nursery to high school. Municipal councils were entrusted with the implementation of these courses and received state financial support to that end.

In the fifth area, associations and religious groups, lawmakers introduced state support for immigrant organizations. Local councils were enjoined to give financial support to immigrant associations operating within their constituencies. Associations of a national character and with at least 3000 members were entitled to financial assistance from the government.662 However, these associations were required to function according to democratic principles, limit their activities within Sweden and use state financial help to complement rather than substitute their own financial means. However, as Carl Dahlström has demonstrated, there has been a decoupling between rhetoric and action.663

Thus, while Swedish policymakers primarily sought to tackle employment issues, they also ensured the equal treatment of immigrants on a wide range of social issues. This was, as described in Chapter Three, a continuation of the rights accrued to immigrants since 1850

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659 Ibid.
660 Ibid., p. 19.
661 Ibid, p. 20.
662 Ibid., pp. 21-22.
thanks to the struggles of activists such as Eliel Löfgren and postwar international human rights instruments. On the other hand, it was in conformity with the trilateral pact entered with LO and employers in 1946 and 1947. As Jesper Johansson reports “[d]uring the second half of the 1960s and the 1970s, LO repeatedly argued that the scale of immigration should be weighted against factors such as access to work, housing, social services, education and language teaching.”

Regarding the controversial “freedom of choice”, from 1980 to 1984, IPOK, *Invandrarpolitiska Kommittén* (Commission on Immigration Policy), while evaluating Prop. 1975:26 following a policy making convention in which each policy is reviewed in its second decade, sought to clarify the three policy goals. In its report, SOU 1984:58 “*Invandrar- och minoritetspolitiken*” (Integration and Minority Policy), IPOK stated—regarding freedom of choice—that, in its opinion, the goal was neutral. It was neither multiculturalist nor assimilationist. It observed that where a relativist interpretation was made, it will generate conflict situations in schools. For example, where some immigrants’ cultural beliefs (Islamic) about gender equality are at odds with those of the mainstream society. It wondered whether it was not preferable to remove this goal of freedom of choice.

In the end, it formulated a new definition of the concept referred to simply as immigrants’ own language and culture. However, the government rejected the Commission’s interpretation and defined freedom of choice as the preservation of the individual’s identity and personal integrity as well as the means of enjoying and developing one’s cultural activities within the norms of Swedish society. But in another reversal the government concluded in 1991, Prop. 1990/91:195, that neither native Swedes nor immigrants could attain full freedom of choice. Finally, in SOU 1996:55, “*Sverige, framtiden och mångfalden*” (Sweden, the Future and Diversity), the preliminary report of the second policy bill, the government dealt almost exclusively with socioeconomic issues and referred issues concerning immigrants’ cultures to SOU 1995:84, “*Kulturpolitikens inriktning*” (Cultural Policy Orientation), the preliminary report of the second Cultural Policy bill, Prop. 1996/1997:3. This gives credibility to the idea that the concept of “freedom of choice” was, as described in the general introduction—and as I show in the next chapter—a case of concept stretching.

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665 Swedish policy bills are ritually evaluated at the end of their second decade unless a crisis occurs in the meantime.
666 SOU 1984:58 *Invandrare och minoritetspolitiken*, p. 44.
667 Ibid., p. 48.
669 Prop. 1985/86:98 *om invandrarpolitiken*.
4.1.2 Betænkning nr. 589, the 1971 Danish Report on the Situation of Guest Workers

Owing to the fact that Denmark’s post-war economic boom started later than in neighbouring Sweden and Germany, and that its labour migration was stopped almost at the same time, in 1973, the problems stemming from the presence of foreign workers in the Danish workplace were less acute. Also, at the onset of the boom, most foreign workers arrived on tourist visas and, once inside the country, sought employment in a phenomenon called “tourist immigration” which resulted in a tightening of immigration rules in neighbouring Sweden and Germany. As Karen Andersen writes, as doors closed on migrants from Turkey then on those from the former Yugoslavia in Germany and Sweden, the next stop became Copenhagen Central Station.671

By 1964, labour shortages had become acute and politicians launched a public debate on the recruitment of foreign labour.672 The first official guest workers started to arrive in Denmark in 1967, mostly from Turkey, Yugoslavia and Pakistan. According to the 1972 census, 29% of workers originated from Turkey, 22% from Yugoslavia, 10% from Pakistan and 19% from the rest of Europe.673 However, as the economy started to slow down at the end of the 1960s, and a series of restrictions were introduced, the government was adamant that immigrant workers should be given the same treatment as Danish workers.

As such, by virtue of Law 203 of 27 May 1970, all foreign workers were required to be in possession of health and unemployment insurances.674 In 1969 the Ministry of Labour set up a commission, led by Niels Elkær-Hansen, an administration official who had also served as secretary for the drafting committee of the 1953 Constitution, to enquire into the guest workers’ situation. The Commission included members of Landsorganisationen i Denmark, the Confederation of Trade Unions, Dansk Arbejdsgiverforening, the Confederation of Danish Employers, the Ministry of Labour, the Ministry in charge of Housing, the Ministry of Justice, the Ministry of Social Affairs and the Ministry of Foreign Affairs.

In May 1970, the Commission was, in addition, given the task of investigating the needs of the labour market for foreign workers and of making an assessment of its advantages and disadvantages. The Commission published its conclusions, Betænkning nr. 589 om

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672 Jensen, Bent (2001) Foreigners in the Danish Newspaper Debate from the 1870s to the 1990s, Copenhagen: The Rockwool Foundation Research Unit, p. 33.
673 Andersen, Karen (1979) Gastearbejder, p. 33.
674 Justitsministeriets lov nr. 203 af 27 maj 1970, § 1, pkt. 2.
udenlandske arbejderes forhold i Danmark, (Report No 589 on the Situation of Guest Workers in Denmark) the year after.

The report made ten recommendations and proposed various policy guidelines which, as in Sweden, dealt with workplace issues.

- The first recommendation, about counseling “rådgivning”, was to designate a facilitator in dealings between guest workers and the administration. On 1 September 1970, the idea became effective with the creation of the post of counselor within the Ministry of Labour and Social Affairs.

- The second recommendation concerned housing “boligforhold”, with the report stating that employers wishing to recruit large numbers of workers should be awarded a license only if they showed that they have the capacity to provide them with adequate housing. This resolution was enacted gradually between 1970 and 1973 through a series of decisions by the Ministry of Labour.675

- The third recommendation concerned leisure activities, “fritidsforanstaltninger” and advised local councils to pay attention to immigrants’ needs namely by providing support for the creation of clubs and associations for which 50% of the costs could be requested from the state.676

- The fourth recommendation dealt with education and emphasized the teaching of the Danish language with a special focus on children. In 1974, the government appointed a consultant to that effect within the Directorate for Early Childhood Education in the Ministry of Education.677

- The fifth recommendation tackled workers’ training. The commission determined that training programmes offered by employers to immigrant workers should help them attain parity with their native counterparts. The Ministry of Labour issued Circular nr. 394/70 to that effect on 23 November 1970.

- The sixth recommendation advised the government to supply more information to the public. The government designated the Integration Consultant appointed on 1 September 1970 in the Ministry of Labour to take on this additional task.678

- The seventh recommendation examined health care and proposed that a tuberculosis

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676 Ibid., p. 30.
677 Ibid., p. 31.
678 Ibid., p. 32.
test be conducted on immigrants upon their arrival in the country. This became effective with a circular of the Interior Minister signed on 24 August 1973.

• The eighth recommendation concerned safety in the workplace. The main problems identified were the linguistic barriers encountered by foreign workers and their limited knowledge of safety practices. The commission advised the government to translate many documents and signs into foreign languages. For instance, the booklet “Lad os arbejde sammen mod ulykkerne” (Let Us Prevent Workplace Accidents) was translated into English, Serbo-Croat and Turkish.679

• The ninth recommendation was the launching of an investigation into the purchasing power and spending habits of immigrants. In 1972 the State Socioeconomic Council, Statens Husholdningsråd produced two reports to that effect, “Indkøbstolk” and “Kostvejledning”, which were also translated into Serbo-Croat, Turkish and Urdu. It recommended the extension of social protection “børnetilskud” to the children of immigrants who have resided in the country for at least six months. This provision was not applied until 26 June 1975 (Lov nr 310) when the period of residency required to qualify for social protection was reduced from three years to only one year.680

• The tenth recommendation dealt with the creation of a central registry for immigrant workers – except for those engaged in home help – who have resided in the country for less than four and a half years. The reason was to exert a better control over the labour market. While the report was not elevated to a fully-fledged policy like the Swedish national policy of 1975, it was no less important when judged by its content and the wide application made of it by the government. However, as in Sweden, labour migration had then been stopped and the nature of immigration was changing; bringing a different set of challenges and expectations.

4.1.3 Different Regimes of Incorporation. A State Agency, the Swedish Integration Board, vs a Private Organization, the Danish Refugee Council

With regard to Yasemin Soysal’s incorporation regimes, the two neighbours resorted to different models. Swedish policymakers applied a corporatist model where policy is driven by associations with the support of the state and implementation follows a ‘top-down’ approach.

679 Ibid.
680 Ibid. P. 33.
Danish policymakers opted for a model that approximates Soysal’s neo-liberal model in which private associations or street-level actors are in the driving seat.

In 1969, a central organization, *Statens Invandrarverk* (SIV) was created in order to oversee integration matters. SIV also took over the functions carried out by *Statens utlänningskommission* (State Commission on Foreigners) regarding immigration issues and the Ministry of Justice concerning naturalization issues. The Task Force on Integration was dissolved and Immigrant bureaus came under the authority of SIV as well. More bureaus were created under its administration and it is not until 1985 that these bureaus were subsequently replaced by reception centers. SIV itself would be dissolved in 1998 and replaced by a new autonomous administrative entity, *Integrationsverket* (Integration Board).

Concerning citizenship or political rights, the most important policies initiated during this phase were the right to vote and to be eligible to stand in council elections after three years of residence, both introduced in 1976. A first in any western country, this decision was passed unanimously by the parliament and was motivated by the desire to give to immigrants a say in the decision making process. As taxpayers and active members of the society, it was also seen as legitimate that immigrants’ voices be heard. However, a similar attempt to extend this right to stand in national elections was rebuffed by parliamentarians, mostly Conservatives. Other measures passed were the relaxation of criteria for naturalization, namely the reduction of the period of residency and the financial requirement, and the abolition of a language test.

In Denmark, the new immigration not only diminished the saliency of the 1971 Report on the Situation of Guest Workers but also the welfare laws of 1976 “*bistandslov, forsorgsloven*”, which had hitherto been applied equally well to both guest workers and native workers. By contrast, it bolstered the role of the Danish Refugee Council, the umbrella non-governmental organization which had been formed in 1956 to help Hungarian refugees and support the 1951 Geneva Convention. As the number of refugees increased over the years, the reach of the DRC expanded to include refugee camps, temporary housing, language schools, judicial help for asylum seekers, job searches, public information, research and development, and even contracting to international organizations and foreign governments, notably that of Sweden in the 2000s.

The DRC projects were financed almost exclusively through fund raising activities until 1978 when the Danish parliament decided to allocate a yearly allowance for the integration

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682 Ibid.
activities of about 500 refugees over a period of 18 months and reimbursed the Council for part of the administrative costs and all the expenses it incurred in its actions in support of refugees. By doing so, the State retroactively claimed its involvement in the integration of refugees. In 1992 a detailed agreement was signed between the two parties.

According to Lærke K. Holm, the long absence of such a national policy or state involvement can be explained by the intractable debates which took place in the Danish parliament in the 1970s over the need for a new immigration law to replace the 1953 Alien Act. However, this state of affairs is not unique to Denmark. In Sweden, integration policy making played “second fiddle” to immigration policy making as well. Nonetheless, a national integration policy was passed as early as 1975 and Danish policymakers were not impervious to policy development in neighbouring Sweden.

It is more likely that successive governments did not want to formulate a national socioeconomic policy on integration. This explains why the government acted upon the recommendations of the 1971 report without formulating a policy and also the fact that the first serious attempt at formulating such a policy was prompted by a crisis, the Martinez Affair.

4.2 Mid-1980s—2000: Job Activation Measures and Anti-Discrimination Policies

In the mid-1980s immigration had risen strongly and showed no sign of abating. On 13 December 1989, following a surge in the numbers of Turkish-Bulgarian asylum seekers, the Swedish government, painting an apocalyptic picture of the situation, used for the first time the so-called “exception clause” of the 1947 Alien Act to rescind the grounds of acquisition for refugee status.

In Denmark, a new Alien Act considered as the most generous in the West

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685 See section on Sweden.
686 Not only are both countries closely integrated through the Nordic Council (the concept of “nordicity”) but also they first looked at each other in terms of lesson learning.
688 See Johansson, Christina (2006) Välkomma till Sverige?
689 From then on, only Convention refugees and asylum seekers who could show a strong need of protection would be given protection while de facto refugees and war objectors would be disqualified. The decision—popularized as Lucia Decision (Luciabeslutet) because it was taken on the day of a popular Saint—was in accordance with the so-called “exception clause” of the 1947 Alien Act, which allowed the government to unilaterally restrict any immigration if it deemed it would negatively affect the country or overwhelm its structures
was passed in 1983 before being rescinded in 1985 amid controversy amongst cabinet members.

Paradoxically as a measure of the “gap hypothesis”,690 two years later, the outbreak of war in Yugoslavia triggered an even larger influx of de facto refugees, approximately 200,000 people. Although not an EU member like Denmark, Sweden followed in the footsteps of EU member states to temporarily award blanket asylum to these refugees.691

As they have done since the 19th century, policymakers in Denmark and Sweden emphasized self-reliance through employment. However, non-Western immigrants were the principal disadvantaged group, with the lowest employment rate, the lowest median salary and the highest rate of dependency on social welfare in both countries.692 The two governments devised specific legislation for increasing the labour market participation of immigrants: the 1999 Danish Integration Act and its Integration Programme “Introduktionsprogram” and Prop. 1997/1998:16, the New Swedish Bill on Integration and Immigration.

They also upheld old civil rights, and formulated new anti-discrimination and human rights measures: equal opportunity and equal treatment. Some of these measures were intended to facilitate the employment of immigrants. Other measures, paradoxically, were the consequences of high profile hate crimes such as the reign of terror against foreigners unleashed by John Ausonius, a sniper nicknamed “lasermannen” (The Laser Man) between August 1991 and January 1992,693 or human rights and ethics violations by the two governments themselves such as the Martinez Affair in Denmark in 1986.
4.2.1 The 1999 Danish Integration Act and its Integration Programme
“Introduktionsprogram”

Precisely the first step toward a socioeconomic integration policy was the result of a crisis: the Martinez Affair. This was named after a Mexican citizen who was expelled at the order of the Minister of Justice, Erik Ninn-Hansen, under suspicion of involvement in terrorist activities and an attempted hijacking. The arbitrariness and extra-judiciary nature of the decision caused public outcry, after which the Minister was compelled to set up a taskforce on immigration and integration.

The taskforce’s report on integration, "Dokumentation om indvandrere, særskrift nr. 3",694 formed the basis of a first report introduced by the Social Democratic government in parliament. In 1983, the government presented a more substantial report, “Redegørelse af 12/4 83 om indvandrerpolitikken”, which laid out three integration policy goals aimed specifically at non-Western immigrants695:

- The integration of immigrants into society.
- The prevention of the formation of ethnic ghettos or separate minorities.
- The attainment of real equality between immigrants and native Danes.696

The taskforce also submitted a proposal for a new Alien Act. The Act hailed as one of the most generous in the world, broadened the concept of refugees to include de facto refugees, those who did not sensu stricto conform to the definition of refugee as per the Geneva Convention but who were considered to be in need of protection. The Act was also one of the first in the West to give legal grounds for family reunification.

However, this outcome was based only on the view of a slim majority of the members of the taskforce. Its work had been marred by deep divisions between restrictionists and non-restrictionists. In 1985 many of the Act’s generous provisions were rescinded. When 1200 Tamils applied for family reunification, Ninn-Hansen instructed ministry officials to stall the

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696 Redegørelse af 12/4 83 om indvandrerpolitikken.
process. The revelation of his action by the media provoked a public outcry and led to a
criminal investigation.  

In 1986, Søren Krarup, a priest, journalist and prolific author on Christianism and
Danishness, started his action against immigration and multiculturalism in a dramatic way.
Taking advantage of a charity event in favour of refugees organized by the Danish Refugee
Council, he constrained the D.R.C. to a defensive posture. On 5 October, the day before the
Danish leg of “Flygtingning 86” (Refugee 86), a Nordic-wide donation campaign in favour of
refugees, Krarup had published a one-page article entitled “Nej, ikke en krone!” (No, not one
cent!) in the *Jyllands-Posten* in which he invited Danes to abstain from making any
donation.

He considered the refusal a form of protest against the corrupting influence of the
Danish Refugee Council in the country and the government’s refugee policy. Thereafter, he
co-founded *Den danske forening* (The Danish Association), a nationalist think-tank and
pressure group and became a parliamentarian and a major ideologue for the far-right Danish
People’s Party.

As the consequence of the numerous problems encountered by the government during
the mass arrival of refugees from Yugoslavia in the early 1990s, the parliament created a
committee on integration policy in December 1994. In May 1997, a commission of enquiry
on integration “*Integrationsbetænkningen*” was set up and it drafted its first policy in the
course of the same year. Contrary to usual lawmaking procedure, various social stakeholders
such as the UNHCR and the Danish Refugee Council were not consulted during its
formulation. Upon the publication of the draft act in the summer of 1998, at the urging of many
human rights organisations, the UNHCR claimed that the government had violated the
provisions of Article 23 of the Geneva Convention, which mandates the same treatment of
refugees and citizens. Therefore the integration allowance provided to immigrants was inferior
to the minimum welfare allowance received by Danish citizens.

Interior Minister Thorkild Simonsen was irritated by the criticism of the UNHCR
regional office in Stockholm, accusing it of turning a technical problem into a political issue.
Although he pledged to look into some aspects of the law, the introduction allowance

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697 Investigations continued until 1995 when Ninn-Hansen was compelled to stand down as speaker of the
Folketing and later received a suspended prison sentence of four months. For a deeper account, see Christensen,
698 For a detailed analysis, see Tawat, Mahama (2006) *Multiculturalism and Policymaking*, pp. 54-56.
“kontanthjælp” remained lower than the basic social allowance offered to native Danes when the final bill, Lov Nr. 474 was published on 1 July 1998. The Act specified as exhaustively as possible the rules for the application of the country's integration policy. The government expressed its pride about what it considered the first “integration act” of its kind in the world. The law specifically targeted refugees from a non-Western background at the expense of all other categories of immigrants.

The Act’s overarching goal, summing up the resolutions of the 1983 government’s report and bearing similarities to the 1971 Report on the Situation of Guest Workers, was to give to newly arrived immigrants the possibility of reaching their potential and contributing on an equal footing with Danish citizens to the development of the society. While the Act wished for such development in almost every domain of society - e.g. social, political, economic, religious and cultural areas - it singled out employment as its main mechanism alongside religion and culture. Immigrants, it stated, should become self-reliant through employment and by acquiring knowledge of local norms and values.

As in Sweden, the Integration Programme “introduktionsprogram” was the cornerstone of this employment policy. Restricted to refugees and their family members above 18 and fewer than 25 years of age, it replaced the 18 month-period of assistance provided by the Danish Refugee Council and funded by the government since 1978. Its new duration was three years and it was billed to start at the latest a month after the arrival of the immigrant in the community. The programme consisted of an integration allowance “introduktionsydelse” and courses on Danish language “danskundervisning” and society “samfundsforståelse.” An activation component “aktivering” was also included. Thus, refugees who refused to take part in the integration programme, under normal conditions would be stripped of the Integration Allowance but not of the opportunity to take the course on Danish language and society.

This provision was intended to punish bad behavior. However, proficiency in the Danish language was considered too important in the integration process in general and the employment policy in particular to be withheld. Without a proper knowledge of the national language, an individual’s opportunities would be severely limited. Policymakers also theorized an interaction between employment and language called “samspil” (synergy). Without Danish language skills, refugees’ job prospects would be bleak, and without employment, there would be little chance that they would attain the same living conditions as native Danes. This

701 Ejrnaes, Morten (2001) “Integrationsloven”.
702 The law accepted exceptions. For example if the person suffers from a physical or intellectual disability which undermines his or her participation in the programme.
led to the enacting of a fully-fledged Act on Danish language teaching alongside the Integration Act on 1 January 1999

4.2.2 Prop. 1997/1998:16, the New Swedish Bill on Integration and Immigration

In Sweden, IPOK, the Commission which was directed to examine the concept of “freedom of choice,” was also asked to prepare a blueprint for new immigration and integration policies. In its conclusions, SOU 1984:58, “Invandrar- och minoritetspolitiken: slutbetänkande” (Immigrants and Minority Policy: Final Report), it claimed that discrimination was the principal obstacle faced by immigrants in the integration process and their attempts to gain a foothold on the job market. In 1986, upon the recommendations of the government-established commission of enquiry on discrimination, a new Anti-Discrimination Office, Ombudsmannen mot etnisk diskriminering was created.

The formulation of an integration policy was relaunched with the return to power of the Social Democrats in 1994. However, formulating an integration policy was now seen more as a matter of necessity than as a policy making tradition or a means of compensation after the previous failure of the Social Democrats in 1976 to expand the right to vote in national elections to immigrants. The parliament appointed in 1994 a Committee to investigate the issue: Kommitt Dir: 1994:130. In its first report, “Arbete till invandrare” (Work for all Immigrants), SOU 1995:76 issued in July 1995 and which soon after became a bill (Prop. 1995/96:22), the Committee proposed to halve unemployment among immigrants (defined as those who have at least one parent as an immigrant), especially non-Western immigrants, by the year 2000.

Following on from this, the government established a task force, “Promemoriam introduktionersätting - tre alternativer”, (Integration Allowance: Three Alternatives), Ds 1997:47, to study the sustainability of an integration allowance and to set up a commission of enquiry into immigrants’ labour market participation. The Committee submitted its report, “Lika möjligheter” (Equal Opportunity) SOU 1997:82, the same year and the findings of all these documents were gathered into a new general policy: Sweden, the Future and Diversity -

705 The functions of the organisation were detailed in Lag 1994:134 mot etnisk diskriminering.
from Immigration Policy to Integration Policy, Prop. 1997/98:16.

The title of the new law was changed from immigrant policy “Invandrarpolitik” to integration policy “Integrationspolitik”, thereby denoting a new policy framework, namely the recognition that Sweden had become ethnically diverse and a country of immigration. But the most important characteristic of this policy when compared with the 1975 bill was the introduction of the Integration Allowance as the main means of welfare support for immigrants. Valid for a two-year period, it included a basic allowance amounting to SEK 5,000 (NZD 500) per month from the state, a means-tested allowance and a tax deductible additional amount. The municipality’s assistance, hitherto limited to refugees and asylum seekers, was extended to other types of immigrants and their families and the state would share up to 50% of the total cost of these provisions with local councils.

As with the 1975 policy, the provision of equal rights, “Lika rättigheter,” irrespective of ethnic and cultural background was the main goal. This was also expanded however to include the notion of equal opportunities, “Lika möjligheter,” and the state was enjoined to make these equal opportunities a reality through the promotion of gender equality and by fighting against racism, discrimination and xenophobia. Meanwhile, the two previous goals of freedom of choice and cooperation were removed, although reference to “cooperation” could still be found in the main text e.g. mutual respect and tolerance. The removal of these earlier goals can be seen as the logical conclusion of the 1991 report which claimed that freedom of choice could not be attained either by immigrants or native Swedes.

The new policy also targeted specific policy areas and unveiled new courses of action. Here too, employment ranked as the highest priority. In a section called “Arbete och försörjning” (work and making a living), the government acknowledged the influence of both external factors such as the structure of the job market and new job profiles, and individual factors such as the immigrant’s level of education, professional experience, length of residence, Swedish language skills and access to support networks. Within the framework of its general policy for economic growth, the government set as a goal halving unemployment among immigrants (those who have at least one parent who is immigrant, especially non-Western immigrants) by year 2000.

709 Ibid.
710 Ibid.
711 Ibid.
711 To that effect, a 5 year-project was set up in order to lengthen the period of education of immigrants among whom a study found that about half lacked any basic primary or secondary school education. Particular attention was to be given to the involvement of immigrants, women in particular, in a two-year training programme of 10,000 IT specialists. The maximum period of professional internship “arbetsplatsintroduktion” (API) whose
Unlike in 1975 when guest workers’ practical problems were at the top of the agenda, the second policy area singled out was not housing but instead language and education, which were now seen as important instruments in achieving equality of opportunity. Policymakers specified measures such as the recognition of immigrants’ foreign qualifications or the provision of complementary education for those requiring it as pre-conditions for attaining equal opportunities.\textsuperscript{712} The mastery of Swedish, the main language of communication, was identified as necessary for both smoothing the social and cultural integration of immigrants and their children into Swedish society and increasing their chances of obtaining gainful employment.\textsuperscript{713}

As in Denmark, the opportunity to learn the national language was unhindered. The term home language “hemspråk” which had hitherto been used to designate the teaching of immigrants’ first language was changed to mother tongue “modersmål” in order to give full significance to the practice. The previous measures taken by the government (Prop. 1996/97:110)\textsuperscript{714} were strengthened to include children for whom only one parent had an immigrant background, adopted children, and Saami, Tornedalians and Roma children. Even if both parents in the family spoke only Swedish, they were given the opportunity to receive mother tongue classes outside the school’s timetable. Lastly, it required the government to pay attention to nursery school level, given that that adherence to the practice had decreased from 50\% in 1994 to 20\% in 1996 and in private schools with a foreign orientation like French, Jewish or Arabic.\textsuperscript{715}

In a new section entitled, “Kultur och religion” (Culture and Religion) referring to Prop. 1996/97:3, the second national cultural policy, lawmakers stated that the government should give support to ethnic organizations, as cultural identity is meaningful for immigrants.\textsuperscript{716} It also urged public institutions to organize thematic exhibitions against racism goal was to give a foothold into the labour market to immigrants lacking experience was extended from 6 to 12 months. AMS offices in areas of high immigrant concentration were allocated more funding and staffs. The government also brought its financial support to Sverige 2000-institutet, a think-tank gathering employers and state agencies with a name alluring the government employment goal for year 2000. Their task was to find ways and means of increasing diversity or immigrants’ representation in the industry. Plans were made to facilitate self-employment among immigrants and recommendations were given to set up a special fund by the government to encourage original solutions, “otraditionella insatser,” to social issues in the budget of that year and the following year. Ibid., p. 48.\textsuperscript{717} Ibid., p. 8.\textsuperscript{717} The knowledge of the Swedish language was said to promote tolerance and mutual respect, help immigrants understand society’s cultural codes and their involvement in the education of their children. Ibid., p. 55. Parliamentarians recommended a strengthening of the curriculum and teaching methods, and expressed their support of the government’s decision in May of that year to designate the Teachers’ Training School in Stockholm as the national centre for the Swedish language learning programme (Svenska för undervisning), SFI\textsuperscript{717} Prop. 1996/97:110 Vissa skolfrågor m.m\textsuperscript{717} Prop. 1998/97:16, p. 62.\textsuperscript{717} Parliamentarians stated that Sweden’s new-found cultural diversity should be manifest in the country’s cultural
and discrimination. Regarding religion, the policy bill affirmed that the country’s religious diversity warranted respect for religions other than the Swedish Lutheran Church and reaffirmed its support for the governance ordinance of 1989 (1989:271) giving state financial support to other religious congregations.\footnote{Prop. 1998/97: 16, p. 69.} This section, given its reference to the cultural policy bill, is, in the words of Favell, a “trace” rather than a new policy initiative. Regarding housing, Swedish policymakers observed that spatial segregation had increased and encouraged a synergy between municipal councils and the central government in their actions to combat this.

\subsection*{4.2.3 The “Double Movement” of Incorporation Regimes: Decentralization in Sweden, Institutionalization in Denmark}

In the late 1990s, in regard to Soysal’s incorporation regimes, a double movement occurred through which, Danish socioeconomic integration policies became gradually more “statist” and Swedish ones more “liberal”. In the new Integration Act, the responsibility fell upon the Danish government to settle refugees a month after their admission into the population registry, \textit{Det Centrale Personregister} (CPR). This meant a reduced role for the DRC and an increased involvement of the state.

However, the law also encouraged synergy with associations, foundations and state agencies and over the years the DRC developed a particularly fruitful partnership with some local councils.\footnote{Interview with Andrea Kamm, Secretary General of the Danish Refugee Council, 4 February 2009, Copenhagen.} Just as the number of refugees allocated each year to each municipality was negotiated between the state and the regional council, the same actors shared the financial burden.

While in Denmark the same situation prompted policymakers to formulate a comprehensive integration policy, in Sweden where such a policy had been in place since 1975, the government sought instead to shift down more responsibilities to regions and local councils. Day-to-day action was still carried out by local councils, but the central government co-financed the councils’ projects aiming at increasing employment among immigrants through productions and institutions. In order to promote tolerance and understanding of immigrants, it was important both to produce a body of knowledge on diversity and allow these immigrants to have pride in and knowledge of their cultural heritage. They endorsed the conclusions of the report \textit{Forum for World Culture} \textit{(Forum för Världskultur)} (SOU 1997: 95), a blueprint for increasing cultural diversity in the cultural world suggested by the 1996 National Cultural Policy, and the government’s decision in June 1997 requesting all the major museums (Statens Historiska museer, Naturhistoriska Riksmuseet, Statens Konstmuseum, Folkens Museum and Nordiska Museet), the Swedish National Heritage Board, the National Archives and the Swedish Exhibition Agency to undertake activities promoting ethnocultural diversity.
education and language and could monitor and help spread good practices among local councils: “uppföljning, utvärdering och erfarenhetsspridning”.

Implementation followed immediately. In the first phase, eight local councils with high concentrations of immigrants were chosen: Botkyrka, Göteborg, Haninge, Huddinge, Malmö, Solna, Stockholm and Södertälje. In May 1997, a further four local councils were added: Eskilstuna, Landskrona, Norrköping and Trollhättan.

The creation of a new government institution focusing exclusively on integration, the Integration Board, Integrationsverket, was proposed in place of SIV, Statens Invandrarverk, which had hitherto handled immigration, integration and refugees. It became operational on 1 June 1998 and lasted until 2006 when it was discontinued by the new right-wing coalition. Although the Integration Board was abolished, its role was performed by another service within the Swedish Ministry of Integration and Equality.

Like in Denmark, as Michael Williams, a former chairman and Emelia Frennmark, a member of FARR, Flyktinggruppernas och Asylkommittéernas Riksråd (Swedish Network of Asylum and Refugees Support Groups) revealed, charity organizations in Sweden have been seeking a greater voice and scope of action, namely through a change of legislation.

In 2005, the Integration Service was created in Denmark on the model of the defunct Swedish Integration board. It aims to monitor and coordinate the integration activities of local councils. It is made up of 5 regional councillors and one coordinator, and is part of the Ministry of Immigration Integration and Refugees.

### 4.3 Year 2000s: Shock Therapy against Joblessness

In November 2001, in a context marked by continued anti-immigrant sentiment, increased immigration and the September 11 terrorist attacks in the USA, the SDP lost the Danish general election to the centre-right government alliance comprised of Venstre (Liberal) and Konservative (Conservative) with the staunchly anti-immigrant far-right Dansk Folkeparti (Danish People’s Party) as a support party. Almost all parties across the political spectrum including the SDP had campaigned for a restrictive immigration policy and a more fruitful integration policy.

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720 Interviews with Emelia Frennmark and Michael Williams, 01 February 2011, Stockholm.
However, the right-wing coalition had been more successful in convincing the Danish electorate that the ruling Social Democrats had had “their chance” and they were the only parties capable of implementing such policy intentions. On 17 January 2002, barely three months after coming to power, the coalition presented its new immigration policy, “En ny udlændingepolitik”. The new bill was touted as exceedingly restrictive, if not the most restrictive in the West and augured a radical change in their integration policy.

In Sweden the mood was as grim. In its mid-way report on the job activation policies introduced in the 1990s, (Integration Policy for the 21st Century), the government stated that:

despite extensive initiatives to give everyone the same opportunities in society, the disparities between immigrants and Swedish-born citizens remain large. This applies mainly to working life, but there are also clear differences within the educational and housing sectors... One of the most important reasons for the feeling of some immigrants that they are excluded is that they lack employment and a role in their new society.721

The situation was made even more urgent by the upcoming accession of ten Eastern European countries to the EU and the fear that this might create what Göran Persson, then Prime Minister, called “social tourism”, an influx of citizens of these countries attracted by Sweden’s generous welfare system.722 Sweden, with Ireland and Great Britain, was the only member state which agreed to open its labour market to the ten countries. Both Nordic countries decided a new course of action. However, while Danish authorities applied pressure on immigrants, their Swedish counterparts by contrast, put the onus on employers.

4.3.1 Pressure on Immigrants: the 2005 Danish Integration Plan, “A New Chance for Every One”

In March 2002, the government White Paper, “På vej mod en ny integrationspolitik” (On the Path toward a New Integration policy), concluded that the situation of immigrants in Denmark was bleak. The White Paper stated that 60,000 persons of working age with an immigrant background were missing from the labour market. This was a waste of resources because these immigrants were, in general, in possession of skills and knowledge needed by the Danish economy and society.723 Like the 1971 Report on the Situation of Foreign Workers and the 1999 Integration Act, the overarching goal of the White Paper was to put immigrants

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721 Ds 2001/02:129 Integration för 2000-talet
on an equal footing, “på lige fod”, with native Danes. Employment was again seen as the key to successful integration.724

However, in contrast to previous policies, the new government claimed to be more pragmatic and action oriented in its approach than the former Social Democratic government, and purported to reach all categories of non-Western immigrants, not only refugees. It intended to wield both carrot and stick towards immigrants by evaluating and benchmarking progress in a plan akin to public management. Immigrants who had steady employment and had completed their language programmes would be rewarded by the early granting of permanent residency. Those who had not followed suit were not to become permanent residents. The introduction allowance was further reduced.

These outlines were furthered detailed in a new White Paper “Regeringens vision og strategier for bedre integration” (The Government’s Vision and Strategies for Better Integration) produced by an inter-ministerial working group of experts on migration in June 2003.725 The document proposed 144 courses of action along three axes:

1. Measures to ensure a coherent and open society “Indsats for at sikre et sammenhængende og åbent demokratisk samfund”. That is, a society where diversity and personal freedom, “mangfoldighed og personlig frihed,” are safeguarded and where the society reacts forcefully to any infringement of common values. The pre-requisite to the realization of such a society was equal opportunity for all.726

2. Measures to increase the labour participation “Indsats for at sikre, at personer med anden etnisk baggrund end dansk klarer sig i uddannelsessystemet”.727 This was described as essential not only for better chances of employment but also for a democratic society to function well.728

3. Increased labour participation of immigrants “Indsats for at flere udlændinge kan komme i arbejde.” It was seen as not only important for immigrants’ self-

724 Ibid.
726 Ibid.
727 Ibid.
728 Ibid
reliance, and the economic benefit of the society and the welfare system, but also as a source of respect and recognition for immigrants.\footnote{Ibid}

A year later the government drew up another programme intended to prevent the growing ghetto-isation of immigrants whose spatial, cultural and social isolation was considered an obstacle to better integration. The programme was to target five to ten so-called ghettos and identified three main strategies in so doing: (1) giving municipal councils the power to refuse housing to welfare recipients in precarious zones, (2) the creation of steering committees comprised of representatives of all social actors to oversee diverse projects. (3) special initiatives for the prevention of crime and the promotion of school tutoring and voluntary actions. Finally, on the 17 June 2005 the government introduced an integration plan, “En ny chance till alle” (A New Chance for Every One), encompassing and fleshing out previous policies since 2002. While it did not reject the policy orientations of the 1999 Integration Act, it sought to tackle joblessness among immigrants in a more forceful way.

The plan enjoyed cross-party support as illustrated by the agreement signed with the Social Democrats on 17 June 2005.\footnote{En ny chance till alle, p. 2.} Its strategy was, on the one hand, to make welfare benefits less attractive than employment. Thus the Integration Allowance was further reduced. The acquisition of an unlimited permanent residency permit, among other rules, was tied to a minimum period of two years of continuous employment. On the other hand, the plan introduced a series of anti-discrimination measures. Unlike in the past services were to be customized as much as possible to each immigrant’s situation.\footnote{See Jørgensen, Martin, B. (2006) “Dansk realisme og svensk naivitet?” p. 271. For a deeper account of the work of the Danish Refugee Council, see Ellegaard, Mette; Rothstein, Klaus and Iversen, Morten (1997) (eds.) Flugt og eksil. Den humanitære udfordring, København: Dansk Flygtningehjælp.}

An Integration Service with five integration counsellors for each region of the country was created to monitor progress in the local councils and help spread good practice. Theoretically, the Integration Plan introduced more variety into the efforts of Danish governments to successfully incorporate immigrants. The creation of the Integration Service inserted a new actor into proceedings, an integration council was created, but immigrants’ associations were given little public recognition or status.\footnote{Hammer, Ole and Bruun, Inger (2000) “Etniske minoriteters indflydelseskanaler”, Magtudredningen, Århus: Institut for Statskundskab.}

\subsection*{4.3.2 Pressure on Employers: the Swedish “Step-In” Programme}

Like its Danish counterpart, the Swedish government introduced a new package of
reforms, mostly activation and anti-discrimination policies. The government launched a new program for immigrants called “Instegsjobb” as part of its labour market reforms, “Ytterligare reformer inom arbetsmarknadspolitiken, m.m.,”\textsuperscript{733} to encourage employers to hire immigrants who could learn Swedish while gaining workplace experience. The state vouched to pay 75\% of the wage, or a maximum of SEK 750 (NZD 150) per day for any newly landed immigrant\textsuperscript{734} recruited by an employer for a period of six months each (a maximum of twenty-four months in total) provided the immigrant was attending a Swedish Language Course for Immigrants (SFI) and making satisfactory progress. Discrimination, xenophobia and racism were designated as “issues of high priority.” The concept of “tolerance” was replaced by that of “respect.” Respect meant an active and reciprocal engagement of immigrants and ethnic Swedes, unlike in the Danish context where it amounted to having a job.

A new commission of enquiry into discrimination, “Diskrimineringsutredningen 2001,” was then appointed to find ways and means of expanding the provisions of the 1999 Act Concerning Measures to Counteract Ethnic Discrimination in Working Life (1999:130). In its report, “Ett utvidgat skydd mot diskriminering” (Extended Protection against Discrimination), the commission proposed a special law against discrimination which was implemented in 2003.

On 22 April 2004, the government launched another enquiry named “Makt, integration och strukturell diskriminering” (Power, Integration and Structural Discrimination), whose aim was to uncover the mechanisms behind structural discrimination based on ethnic and religious grounds, to examine the impact of these types of discrimination on the democratic and integration processes, and to devise prospective solutions to these issues. Its conclusions were published in a voluminous seven-part report between 2005 and 2006. The following aspects of enquiry were considered in a chronological order in each volume: the state of academic knowledge on the issue,\textsuperscript{735} testimonies from immigrants,\textsuperscript{736} the political participation of immigrants,\textsuperscript{737} the treatment of immigrants by the media,\textsuperscript{738} the experiences of immigrants within the justice system,\textsuperscript{739} the contribution of immigrants to the welfare system,\textsuperscript{740} and

\begin{itemize}
\item \textsuperscript{733} Prop. 2006/07:89 Ytterligare reformer inom arbetsmarknadspolitiken, m.m..
\item \textsuperscript{734} Those who had received a resident permit within 36 months.
\item \textsuperscript{735} SOU 2005:41 Bortom vi och dom - Teoretiska reflektioner om makt, integration och strukturell diskriminering.
\item \textsuperscript{736} SOU 2005:69 Sverige inför - röster om etnisk diskriminering.
\item \textsuperscript{737} SOU 2005:112 Demokrati på svenska? Om strukturell diskriminering och politiskt deltagande.
\item \textsuperscript{738} SOU 2006:21 Mediernas vi och dom - mediernas betydelse för den strukturella diskrimineringen.
\item \textsuperscript{739} SOU 2006:30 År rättvisa rättvis? Tio perspektiv på diskriminering av etniska och religiösa minoriteter inom rättssystemet.
\item \textsuperscript{740} SOU 2006:37 Om välfärdens gränser och det villkorade medborgarskapet.
\end{itemize}
At the end of year 2006, the Swedish government was considering further measures for the integration of immigrants on the job market.

However, during the same period, the actions of the government were marred by the “deported Egyptians” affair. Like the Martinez affair which occurred in the 1970s in Denmark, in December 2001 the Social Democratic Foreign Affairs Minister, Anna Lindh, ordered the deportation of two Egyptian asylum seekers, Mohammed Alzery and Ahmed Agiza, to their country of origin where they were being sought for their suspected involvement in terrorist activities. According to human rights organizations, these men were allegedly tortured by the Egyptian police during their custody. Alzery was released in 2003 without charges but kept under house arrest, while Agiza was sentenced to 15 years in prison.

More than anything, it is the arbitrariness and illegality of their rendition, without a migration court ruling and to a country where they would face torture, which provoked the ire of human rights organizations, although the Social Democratic government argued that it had obtained from the Egyptian government the promise that the deportees would not be subject to torture or the death penalty. Nonetheless the new right wing government consented to an arrangement out of court, and re-examine the resident permit applications of both men. Thus, like in Denmark, any violations of immigrants’ civil rights, for which activists such as the lawyer Eliel Löfgren had fought passionately earlier in the century, were prevented.

4.3.3 The Danish and Swedish Duel over Dual Nationality

The dichotomy, that was observed in the processes of naturalization in Denmark and Sweden since the 18th century with the citizenship restrictions of 1898, 1935 and 1999, culminated in a controversy between the two countries over the issue of dual nationality. With more than 100,000 Swedish citizens holding citizenship from a second country at that time, it had become praxis to “tolerate” dual citizenship but this was nonetheless the source of numerous administrative conundrums.
The task of the commission of enquiry\textsuperscript{748} set up by the Citizenship Committee, Medborgarskapskommitten, of the Swedish parliament was to find out if the instauration of a system of dual nationality was beneficial for both the individual and the state, and more precisely, whether it facilitated the political participation of permanent residents, their integration, and in helping them to preserve links with their countries. The committee’s report “Dubbelt medborgarskap” (Dual Nationality)\textsuperscript{749} released in 1986 pronounced favourably on these matters.\textsuperscript{750}

However, no further action was taken following the defeat of its main proponent, the SAP government, at the hands of the right wing coalition led by the Swedish Conservatives in 1990.\textsuperscript{751} After the return of Social Democrats to power, a new commission of enquiry named the 1997 Citizenship Committee was put in place on 16 January 1997,\textsuperscript{752} with the task of reassessing the Citizenship Law of 1950 (1950:382) - the first such attempt in 47 years - and of finding ways of strengthening citizenship. On 17 June 1998, the Committee was given the additional task of assessing, without bias, the pros and cons of a system of dual nationality. Its conclusions were published in the preliminary report SOU 1997:162, “Delbetänkandet medborgarskap och identitet” (Citizenship and Identity), and the final report SOU 1999:34 “Slutbetänkande svenskt medborgarskap” (Swedish citizenship). Both reports were accepted without major changes by the government (Prop. 1999/2000:147) despite the opposition of the Conservatives, and dual citizenship became law in 2001 through the new Citizenship Act, “Medborgarskalslag 2001:82”.

The adoption of dual nationality in Sweden but also in Norway, or rather the refusal of Denmark, Finland and Iceland to adopt it, put an end to the consensus which had prevailed among Nordic countries. As part of their efforts to promote the free movement of their citizens, a common labour market, and the deepening of their integration, Nordic countries had abolished any visa restriction and agreed to avoid any unilateral change of legislation about citizenship as this would affect their respective citizenship laws. The Swedish Prime Minister accused Denmark of undermining Nordic solidarity with its new migration policy.\textsuperscript{753}

\textsuperscript{748} SOU 1999:34 Svenskt medborgarskap.  
\textsuperscript{749} SOU 1986:6 Dubbelt medborgarskap.  
\textsuperscript{750} For a good account of the debates, see Spång Michael (2007) “Pragmatism all the Way Down?” p.109.  
\textsuperscript{752} Ibid.  
Throughout this period of study, Danish and Swedish policymakers maintained the same credo of employment and equality like in the period 1850-1960, although a new logic emerged around the low labour participation of immigrants. They sought above all to fulfil their regalian functions, accumulation and fairness. They devised integration programmes with the goal of increasing employment among immigrants and heightening their socioeconomic status, notwithstanding their contribution to the economic growth of the country and the sustainability of its welfare system. These programmes, as illustrated by the 1999 Danish Integration Act and the 1997 Swedish Bill (Prop. 1997/1998:16), basically comprised of on-the-job training schemes and Danish or Swedish language courses.

From the year 2000 onwards, because of the failure of previous programmes to reduce joblessness among immigrants, both governments adopted a more pro-active approach including targets, policy evaluation/benchmarks and combining a “stealth” or “lean” integration programme with incentives to work and anti-discriminatory measures. In Denmark, the government set the target of reaching 25,000 immigrants on the job market by 2010 through its “A New Chance for Every One” policy. Integration programmes were individualized. The basic allowance for refugees, “kontanthjælp” was further reduced and would be cancelled if a refugee desisted from the Integration Programme. Furthermore, the acquisition of a permanent residence permit was linked to at least two years of continuous employment.

Swedish policies presented the same basic characteristics: a leaner integration programme, Instegsjobb, which combined language acquisition with on-the-job training. But while in Denmark the right wing government directed incentives and the threat of negative sanctions toward immigrants, in Sweden the Social Democratic government geared their policies toward employers. Incentives included tax deductions and subsidies toward the wages of newly employed immigrants, while the package of anti-discriminatory laws passed during that period was intended to deter employers from discriminatory practices.

Therefore these policies were incorporated in various ways at various times. They trumped any attempt at making a typology with staying power. Despite a similar social welfare system both countries’ incorporation regimes diverged. Moreover, each regime varied “individually”. In Denmark this policy development was unusually complex. The government left the management of integration to the Danish Refugee Council until 1978 when it retroactively paid most of the expenses incurred by the organization. Then, like in Sweden, when it formulated its first fully-fledged policy, the Integration Act of 1999, the bulk of responsibility was given to the local councils.

In Sweden until 1985, integration matters were driven by the state, which exerted action at the national level through the Swedish Labour Market Board (Arbetsförmedlingen) and
ethnic associations. Then a considerable amount of responsibility was shifted down to local
councils and the National Immigration Board (SIV). Finally, an autonomous state agency was
created out of the latter in 1998 only to be disbanded in 2006. Today services are provided
directly to individuals according to their particular needs and abilities, and charity
organizations\textsuperscript{754} increasingly are in the driving seat,\textsuperscript{755} while ethnic associations are more
concerned with the valorisation of immigrants’ cultural activities.\textsuperscript{756}

Regarding citizenship and political rights, both countries maintained the same
citizenship principle: \textit{jus soli}, which deflects arguments like that of Brubaker based on
citizenship traditions. However, conversely to Sweden, Denmark rejected dual nationality in
the 1990s and implemented a citizenship test in the 2000s. This confirms the finding in Chapter
Three that the process of naturalisation has always been more restrictive in Denmark than in
Sweden, and the claim that criteria of naturalization rather than citizenship principles, \textit{jus soli}
and \textit{jus sanguinis} as argued by Brubaker, may better explain states’ citizenship policies. Yet
although naturalization is sometimes touted as an instrument of integration, it deals mostly with
immigration - who gets unlimited access to the nation state -\textsuperscript{757} rather than the nature of
integration policies.

Immigrants’ civil rights, namely the right to due and fair procedure during orders of
expulsion and deportation to countries where they could be tortured or face the death penalty,
were safeguarded as illustrated by the Martinez and Tamil affairs in Denmark and the
“deported Egyptians” affair in Sweden. They were even consolidated through the creation of
migration courts. Political rights advanced significantly but not to the point to which one might
perhaps aim. Immigrants were given the right to vote in regional and council elections for the
first time in Sweden in 1975 and in Denmark in 1981, but not in national elections.

\textsuperscript{754} Flyktinggruppernas och Asylkommittéernas Riksråd (Swedish Network of Asylum and Refugees Support
Groups). Organizations such as FARR, Caritas Sweden, Save the Children, the Swedish Red Cross and the
Swedish Refugee Aid are routinely invited at debates and meetings preceding instances of lawmaking.

\textsuperscript{755} Interview with Michael Williams, vice-chairman, and Emelia Frennmark, members of FARR, 20 January 2008.
For a description of these organizations see European Council on Refugees and Exiles “Working together to
Protect and Respect refugees” available at http://www.ecre.org/members/sweden, last accessed 16 December
2008. For a protocol list of such a meeting, see Riksdagen Socialförsäkringsutskottet, Protokoll
28, last accessed 20 December 2008.

\textsuperscript{756} Mats Wingborg came to the latter conclusion in a study of the integration activities of 30 of 150 registered
ethnic organisations in the region of Stockholm, Wingborg, Mats (1999) \textit{Invandrarföreningarna och
integrationen. Utvärdering av Föreningarnas Verksamhet i Stockholm}, Integrationsförvaltningen i Stockholms
Stad.

\textsuperscript{757} Citizens, unlike foreign residents, have the indefinite right to stay in the country. They also have exclusive
access to certain professions like the military, and eligibility to certain functions like the presidency.
Regarding the “freedom of choice”, attempts by successive governments to clarify it were inconclusive. It was probably a case of “concept stretching” as discussed in the Introduction, and as I show in the next chapter. Defined as “choice”, it fell short of the definition of a truly multicultural policy which, as we have seen in Chapter Two of this dissertation, requires substantive actions on the part of a government in favor of the celebration of difference. On the contrary, the freedom of choice goal put the onus on the individual. The word “choice” itself meant that multiculturalism was just one option.
Chapter 5: The Birth of Danish and Swedish Cultural Integration Policies: The Impact of Ideas from Policy Legacy and Olof Palme

As the review of Denmark and Sweden’s integration policies from the mid-19th century until the end of the 1950s in Chapter Three has shown, prior to the arrival of non-Nordic and non-Western immigrants in the 1960s, both countries had a similar background in terms of socioeconomic, political and cultural integration policies. They had practised assimilation toward immigrants and made two major demands: employment and self-sufficiency. They had equally imparted civic rights to fair procedure and socioeconomic rights to these immigrants but no political rights.\textsuperscript{758} In the period which followed (1960-2006), both states consolidated these socioeconomic rights and maintained the same emphasis on work and self-help as demonstrated in Chapter Four. But unlike in the previous period, they allowed permanent residents to take part and be eligible in local elections. However, regarding their cultural integration policies, as I hypothesized in the introduction, while Denmark maintained assimilation, Sweden adopted multiculturalism.

The aim of this chapter is to give a theoretically informed account of the determinants of this policy divergence through a study of the policy making phase. I apply to this effect the “truth table” designed in Chapter Two with the help of the Configurational Comparative Method and the selected theories: John W. Kingdon’s policy streams model on agenda setting, Sheri E. Berman’s and Erik Bleich’s respective models on the nature of gatekeepers and their role on policy adoption, and Ellen M. Immergut’s model on the impact of structural veto points on policy outcome.

Concretely, I answer two sets of questions in relation to the truth table. A first set relates to agenda setting or the way an issue such as multiculturalism may find its way onto the table of policymakers defined as members of governments, parliaments and committees of enquiry. The first question of the first set of questions deals with the politicisation of the issue

\textsuperscript{758} While it can be argued that non-policy is policy too, in this case it was rather the natural order of things than a policy intention.
or problem recognition. That is whether the valorisation of immigrants’ cultures became a public and controversial issue. I show that in Denmark, policymakers, the civil society in general and advocacy groups in particular, were silent on the issue. In my view, the late onset of labour migration, the adoption of a guest worker’s system and the lack of a charismatic figure, explain this absence. By contrast, in Sweden, multiculturalism became the object of a controversial and acrimonious debate pitting advocates and opponents. I show that a policy entrepreneur, David Schwarz, was at the origin of this politicisation.

The second question deals with change in the politics stream. It investigates whether a contingent event such as an election, government reshuffling, political scandal or crisis, led to a change in the political landscape that facilitated or hindered the birth of a policy. I demonstrate that government re-shuffles respectively in 1968 in Denmark and in 1967 in Sweden, and the appointments of Kristen Helveg Petersen and Olof Palme as Ministers in charge of Culture, constitute such events. Both Ministers went on to establish commissions for the elaboration of national cultural policies. The third question in this first set is connected to the availability of policy solutions: concrete policy proposals regarding the valorization of immigrants’ cultures. I show, in this regard, that pluralist policies were available both in Denmark and in Sweden. They were contained in sections devoted to immigrants in White Paper 517 and SOU 1972:66 produced respectively by the Danish and Swedish working commissions. However, the former did not include immigrants’ culture unlike the latter.

The second set of questions relates to the way policy was formulated and adopted during this critical juncture. I enquire firstly about the nature of these gatekeepers, policy actors who have the power to press the ‘accept’ or ‘reject’ button. Who were they? I demonstrate that the Danish gatekeeper in Denmark was Kristen Helveg Petersen who became Minister of Culture in 1968. In Sweden, the activist gatekeeper was Olof Palme, who became Minister of Culture in 1967 and then Prime Minister in 1969. He was an activist gatekeeper because, rather than just sitting at the gate, he was himself a “carrier”, the promoter of this policy.

Then I investigate the origin of these priors. As explained in the theoretical chapter, priors are, following Erik Bleich, idea-frames which affect politicians’ decisions and are present before, during and after policy formulation (implementation and evolution). I argue that the prior of Niels Matthiasen, who had become Minister when the White Paper was published, came from the 1953 agreement on culture, while Olof Palme’s priors stemmed from his personal experience.

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759 The presence of a prior after policy adoption is demonstrated in the next chapter. It is illustrated for instance through path dependence.
Also I study the effect of the arrangement of gatekeepers (spatially or sequentially) on policy outcome for this specific issue. In Denmark, the structure of gatekeepers was single and sequential (in one line) because cultural policy was highly personal. It often consisted of the Minister of Culture’s speech or action. As the “only gate”, a multicultural policy had virtually no chance of emerging with the Minister holding negative priors toward multiculturalism. In Sweden, the arrangement of gatekeepers was multiple but sequential as well. A policy had to go through many gatekeepers, who were aligned one after another. Concretely, although the Minister initiated policy, the policy proposal was drafted by a committee and submitted to social stakeholders for consultation. Thereafter, the government would make changes and submit it to the parliament for final approval.

Finally, I examine the presence of a parliamentary majority and party discipline because owing to the presence of multiple gates, it was not enough for one gatekeeper like Olof Palme to have positive priors toward multiculturalism. The support of the Standing Committee on Culture and the plenary session of the Riksdag were needed, as discussed in Chapter Two. However, I show that only party discipline was crucial and it was achieved through Olof Palme’s influence.

The first section expands on all the arguments presented above in connection with agenda setting. I use for that purpose “more general explanation”, a variant of process tracing. As explained in Chapter Two on theory, it is a less detailed account than analytic (detailed) explanation. I eschew detailed explanation because of parsimony. It is possible to reveal the policy making process of the Swedish 1972 Cultural Policy Enquiry Report without delving into minute details. By contrast, I use analytic explanation in the third section, which traces the decision making process of the bill in the parliamentary arena. Therefore, decision making at that stage was more “high-profile” and theoretically complex. For purposes of clarity, the two cases are cross-referred as necessary.

5.1 The Multicultural Question on the Agendas

As claimed by John W. Kingdon and described in Chapter Two, two conditions must be fulfilled in the problem stream as part of the agenda setting process. An issue must become

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760 Some Danish ministers have followed the same procedure as in Sweden for specific policies albeit not general policy goals.
public and problematic. Yet while a virulent debate occurred in Sweden, immigrant and even immigration issues hardly featured in the public media in Denmark.

### 5.1.1 The Democratization of Culture in the Early 1960s

In the late 1950s and early 1960s, the cultural sector in both countries was on the cusp of change. Despite booming economies and a remarkable improvement in their populations’ economic well-being, there were persistent inequalities in access to cultural goods and services. Culture was seen as the “last frontier”, the sector of the society which the welfare state project had not reached and “doing” cultural policy was fashionable. Policymakers concurred that cultural activities, including those driven by commercial entities, should be disseminated to the entire population regardless of social status and geographical residence. Artists from all sectors should receive material state support from the state but be insulated from pressure from the state and commercial interests. Lastly, art education should be improved. These notions were encapsulated in the concept of a “democratisation of culture.”

In Sweden, where there was little institutional legacy, a new cultural policy had to be engineered. In 1961, the Swedish government tabled a bill providing guidelines for short-term reform: Prop. 1961:56, “Kulturpolitiska handlingsprogrammet” (Cultural Policy Programme of Action). The programme consisted of a step-by-step and methodical investigation of each cultural policy sector. The film reform was launched in 1963 and MUS 65 “musei- och utställningssakkunniga”, the enquiry about museums and exhibitions and a basis for future cultural policy, launched in 1965. The restructuring of radio and television was undertaken in 1966 (Prop. 1966:136).

In Denmark, development was at first slow. While the Danish cultural sector had witnessed early policy developments prior to the 1960s, the new Ministry of Cultural Affairs established in 1961, was aimless and in need of development. An accidental creation - the

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763 For example, in Denmark, state support for cultural activities was limited to performing artists, and policy officials were undecided about which course of action to take regarding creative artists. Bakke, Marit (1987) “Government and the Arts in Denmark”, p. 98.

During the process of establishment, the Ministry of Ecclesiastical Affairs had become too large and the object of a turf war.\textsuperscript{765} It had not been assigned specific objectives at its birth. But Danish officials were aware of this situation and the progress made in Sweden. Henning Rohde, who was in charge of implementing the new ministry, led a study visit there.\textsuperscript{766}

While Julius Bomholt, an advocate of a strong cultural policy, was appointed at the head of the Ministry, Jens Otto Krag, who had replaced Viggo Kampmann in 1962 as Prime Minister after he suffered a heart attack, had little interest in cultural affairs. In addition, his relationship with Bomholt was conflictual.\textsuperscript{767}

Nevertheless, in 1964 Bomholt accomplished the tour-de-force of having some bill proposals written within a period of three weeks and the Folketing passed five government bills “back-to-back” between March and April 1964: Bill 55 of 4 March 1964 on music conservatories; Bill 118 of 15 April 1964 on state financial support to arts museum, Bill 169 of 27 May 1964 on state support to Sjælland (Zealand) regional orchestra; Bill 171 of 27 May 1964 on public libraries and Bill 170 of 27 May 1964 on the State Arts Foundation.\textsuperscript{768} In the same year, the Ministry of Culture extended state funding to music and literature.\textsuperscript{769}

However, the ‘top-down’ nature of these policies immediately created opposition. The publication of the State Arts Foundation’s list of grantees and its bid to educate the population through abstract art stirred controversy in the Folketing and gave rise to a populist movement called Rindalism.\textsuperscript{770} The movement asked for a careful management of public funds, non-interference of the state in artistic creations, needs-based support to artists and the production of arts that can be understood by grassroots people. This reaction was rooted in the feelings of estrangement of the rural and industrial working classes created by rapid urbanization.\textsuperscript{771}

Following these protests, the Minister, Bodil Koch, abandoned the project of creation of cultural houses in cities stating that it was “too ‘top-down’ and limited to the dissemination of arts” and the subject of cultural policy became taboo because the rest of the Danish political
In Sweden, most policy initiatives were centered on the state’s own actions with regard to the diffusion of arts rather than geared at the population’s own needs. Prop. 1961:56, *Kulturpolitiska handlingsprogrammet*, the Ministry’s first policy project established in 1961, was only a short-term plan of action. In both countries, there were no overarching cultural policy goals.

5.1.2 Discord in Sweden

The debate on multiculturalism in Sweden opened with a salvo. On 21 October 1964, in a lengthy article titled “*Utlänningsproblemet i Sverige*” (The Alien Problem in Sweden) in *Dagens Nyheter*, David Schwarz, an intellectual and Polish-born Holocaust survivor urged the Social Democratic government of Tage Erlander to deal with the dismal situation of immigrants. Schwarz stated that while most of the 400,000 immigrants who arrived after the Second World War had attained a level of economic achievement on par with native Swedes, they still lagged behind on the social and emotional planes due to discrimination, difficulties with Swedish language acquisition, lack of social services adapted to their needs, and even differences with the native population in degree of religiosity, temperament and patriotism. For example, the eagerness shown by Catholics and Jews in preserving their religion or national traditions was often misinterpreted by natives as discontent with the Swedish way of life and refusal to pledge allegiance to the country.

Schwarz named three imperatives which according to him compelled the government, in the country’s own interests, to help minorities preserve their cultures. The first was humanitarian or moral. Minorities’ religious congregations, he claimed, lacked sufficient financial resources, parents faced numerous difficulties to inculcate their home culture in their children and, without government support, their spiritual death was certain. The second was economic. He warned that Sweden could see an exodus of its foreign-born population of

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774 Ibid., p. 107. Interestingly, the document reports on both the situation in Denmark and in Sweden.
775 One of Sweden’s main daily newspapers.
778 Schwarz, David (1964) “Utlänningsproblemet i Sverige”, *Dagens Nyheter*, 21 October
working age if it felt estranged and this would undercut the country’s economic vitality. The third was security. Schwarz wrote that if the country continued to receive immigrants at the same rate (10,000 per year) without setting the conditions for their proper integration into the society, they would create untold problems. For example, the fierce ideological battles raging within many immigrants’ associations and the radicalization of some immigrants who, upon arrival in Sweden, were apolitical but now had become hardcore communists and fascists.

In Schwarz’s opinion, the country’s actions on the international scene, in favor of Third World countries and oppressed minorities in dictatorships and in the USA, would only be credible in the eyes of its own minority groups if it showed similar concern for their problems. He recommended a series of measures among which the creation of an independent commission of enquiry on the situation of immigrants, a professorship or ministry for integration issues, the training of immigrant social workers and youth mentors, the equal recognition and financial support for immigrant schools, subsidies to immigrants’ newspapers and churches, and the appropriation of assembly halls for immigrants’ meetings.

Schwarz’s article triggered a virulent reaction among intellectuals opposed to multiculturalism, most notably Michael Wächter. In an article entitled “Låt minoriterna assimileras” (Let Minorities be Assimilated), Wächter came to the defence of assimilation. While he acknowledged that the adoption of new values and norms, and integration in a new society can be challenging and the source of anguish for immigrants, he claimed that no immigrant group had been prevented from practising its cultural traditions as long as these did not infringe the law.

They had freely erected churches and communal associations. But the government could not combat ethnocentrist tendencies such as chauvinism, racism, and religious intolerance within the main stream population, and support them among immigrants. It could tolerate but not encourage such pre-modern religious practices as that which forbade marriage between a Catholic and a Protestant or a Muslim and a Jew, and thereby “build a Berlin Wall” between communities.

Together with Count Claes A. Wachtmeister who would later become the leader of Ny Demokrati (New Democracy), the first Swedish far-right party to enter parliament in 1991, 779

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779 Ibid.
780 Ibid. Schwarz’s first article is representative of his arguments and those of other advocates of multiculturalism in following articles. However, occasionally new arguments were put forth. He claimed for example that Sweden, as a small state and a prospective member of the then European Economic Community (E.E.C) within which it will become a “minority state”, was “putting itself in a corner” by treating its minority groups in that way. Schwarz, David (1966) “Invandrarna och svenskheten”, Dagens Nyheter, 25 February.
they argued in another article, that assimilation was the right policy but *forced assimilation* of the colonial time should be avoided. The government should “stick” to non-policy even though it would be still acceptable if it decided to implement an assimilationist policy. They stated that existing social institutions were totally suitable for the task. Assimilation was a question of suitability and not a moral issue.

Wächter instead advocated *increased assimilation*. This concept, according to him, meant increased equal opportunity for immigrants. It went beyond the mere provision of Swedish language courses to require a real and reciprocal effort of accommodation from both immigrants and natives. In January 1966, in its first official reaction, the government set up a Working Group on Integration Issues, *Arbetsgrupp för invandrarfrågor* which was tasked to investigate immigrants’ overall situation including their cultural situation. However, to the disappointment of partisans of multiculturalism and David Schwarz, who branded it “a Trojan horse for assimilation,” the group tackled only a few socioeconomic issues concerning immigrants such as translation and information newsletters in their most common languages and geared most of its focus at companies, state agencies and associations.\(^{782}\) The following table gives a sense of the virulence of the debate and its content. It is not a full sample of all the articles published then. However, it denotes the various arguments and issues used by proponents and opponents of multiculturalism.

This debate brought the multicultural question to the attention of Swedish policymakers but did not directly engineer policy change. It was heated and divided as the table above illustrates, and the configuration of power itself was tilted against advocates of multiculturalism. At a talk at Stockholm University a few months before the creation of the Working Group, Torsten Nilsson, then Minister of Foreign Affairs in charge of Immigration, had bluntly stated in response to a question by David Schwarz on the situation of immigrants that those who do not want to become Swedes should move to another country.\textsuperscript{783}

\textsuperscript{783} Ibid., p. 130.
When the Riksdag met in 1968 over the Enquiry on the Primary Education of Swedish Children Abroad, boarding school and Immigrant Children “Utlands- och internatskoleutredningen”784, the debates quickly turned into a bitter confrontation over multiculturalism. The incumbent Social Democrats were opposed to it, while right-wing parties lent their support to such a policy. The former were led by Åke Fältheim, one of the country’s foremost experts on primary education, and a board member of Skolöverstyrelsen, the Swedish National Agency for Education,785 and more significantly Alva and Gunnar Myrdal. These were two of the most influential figures in Sweden and perhaps the most renowned academic couple in the world. Alva was a staunch feminist, reputable sociologist, expert on children’s and family issues, and later the winner of the 1993 Nobel Peace Prize for her work on disarmament.786 Together with her husband, Gunnar, a sitting Social Democratic member of the Upper House and the winner of the 1974 Nobel Economics Prize, they had co-authored the landmark “Kris i befolkningsfrågan” (Crisis in the Population Question) which became an ideological foundation of the welfare state project.787 Gunnar was also the author of the seminal An American Dilemma: The Negro Problem and Modern Democracy,788 a 1944 study which he had conducted on the conditions of African-Americans, at the invitation of the Carnegie Foundation.

The book became a bestseller and is credited for inspiring the programme of affirmative action and cultural recognition which was implemented in the following decades by various US educational and state institutions. Charles Taylor, as I mention in Chapter One, also drew inspiration from the book. Paradoxically, the Myrdals were opposed to the idea of multiculturalism in Sweden.

In the Lower House, Andra Kammaren, Åke Fältheim and Alva Myrdal defeated a motion against state funding to St-Eriks Katolska Skolan, a Catholic school and agreed that

785 The agency was then called Skolöverstyrelsen (SÖ). It became Skolverket in 1991.
787 Myrdal, Alva and Myrdal, Gunnar (1934) Kris i befolkningsfrågan. The book warned of the negative effects of the decline in the Swedish population birthrate on its society and economy. It proposed key measures such as children’s and housing allowances, free access to nursery schools and health care, and so on.
funding be provided to Hilel Skola, a Jewish school, for a transitional period of time. With other Social Democrats, they argued that multiculturalism was a threat against the assimilation of minorities\(^789\) and thus the unifying equality of the welfare state project.\(^790\) Ideally, all pupils in the country should attend public school and any religious or language education provided to a minority group with state funding should take place within this framework. State support for these schools would exact a tremendous cost on public finances.\(^791\) Some even suggested that the real aim of right-wing parties was to undermine the SAP school policy.\(^792\) The same year, the SAP refused to recognize immigrants as national minorities—a status which would give to the multiculturalist cause more weight—but as pressure groups.\(^793\)

Right-wing parliamentarians argued that Hilel School did not exact a greater cost to the taxpayer than public schools and almost every West European country, including Denmark and Finland, had granted funding to such schools. Sweden as a signatory of the UNESCO Convention against Discrimination in Education was compelled to allow the existence of ethnic and religious schools. Lastly, parliamentarians Ove Nordstrand and Folke Bjorkmann maintained respectively that the majority of immigrants wanted to preserve their cultures and authorizing communal schools would help them transmit their cultures to their children. Sweden had become an ethnoculturally diverse country and would remain so in the future.\(^794\)

The support of these parliamentarians can also be explained by their conservative values on religion and the export orientation and political internationalism of their main electoral constituents, the transnational corporations. As Niels Elvander has shown, these corporations had lobbied at any opportunity for Sweden to open up to international influences.\(^795\) Whether state funding for private schools constitutes a defining or accompanying characteristic of multiculturalism, is still the object of debate among scholars. While multiculturalism was adopted in the 1970s, parties continued to fight along the same lines on school funding in the following decades. In that sense, Palme could have opposed these provisions and remained


\(^{792}\) Ibid., p. 104. In the Upper Chamber Gunnel Olsson, the leader of Social Democrats, claimed that state support for Hilel School would only be possible on the basis that Jewish children had been traumatized in the Nazi camps and needed special help. It was not necessary to have such a school for the sake of preserving Jewish culture given that Jews had lived and integrated well into Swedish society while retaining their culture over 200 years. If state support to Jewish and Catholic schools was authorized, the state would have to extend the same right to other ethnic and religious groups, including the growing group of Muslims whose cultures are even more different than that of Swedes. Ibid., p. 101.


deeply committed to multiculturalism. The reverse is also true.

5.1.3 Silence in Denmark

Such a debate was absent in Denmark. The underlying question is thus: why did the issue became problematic in Sweden and not in Denmark? As discussed in Chapter Two, for an issue to become problematic, two conditions must be met: the presence of an immigrant group with grievances, and a policy entrepreneur like Schwarz who wants to devote time and resources, for the issue to become salient. In Denmark, even a few years after the beginning of labour migration, no leader of his caliber had emerged. Schwarz did not only “trigger” the debate in Sweden but he was also its most prolific contributor. He authored or co-authored 30 articles on the topic between 1964 and 1967.\textsuperscript{796} If one includes replies to his articles, the total number of articles rises to 115.\textsuperscript{797}

In a biography of Schwarz entitled “En invandrarpolitisk oppositionell” (An Immigrant Policy Dissident), Henrik Román writes that almost all Schwarz’s articles were confrontational and replete with worst-case scenarios because he wanted above all to create a debate.\textsuperscript{798} He remarks that, before 1964 the absence of an integration policy went unnoticed and many agree that Schwarz’s article was the “wake-up call.”\textsuperscript{799} It is, however, important to note that Schwarz was not a carrier in Berman’s sense. He did not have any authority except for his role in publicising the issue. There was even a mutual aversion between him and the reigning Social Democrats whom he compared unfavourably to the Conservatives.\textsuperscript{800}

While a social cleavage (deprivation) is the source of motivation of a policy entrepreneur like Schwarz, the existence of a social or interest group itself is a prerequisite for the formation of a social cleavage. Unlike in Sweden, immigrants were not numerous enough to constitute, properly speaking, a community in Denmark. When Schwarz opened the debate on multiculturalism in October 1964, Danish opinion leaders were still debating the possibility of importing foreign workers. Four months earlier, on 29 June 1964, Hilmar Baunsgaard, then

\textsuperscript{797} He founded in 1974 a magazine on immigration and integration, \textit{Nordisk minoritetsforskning} (Scandinavian Migration and Ethnic Minority Review) which was renamed in 1975 \textit{i&m}, \textit{(Immigrants & Minorities)}. He edited the magazine until 1996, writing with the same poise and making regular appearances in the media. He died in 2008- a month before his 80\textsuperscript{th} birthday. For an exhaustive list of newspapers articles, interviews and appearances in radio and television related to Schwarz, see Román Henrik (1994) \textit{En invandrarpolitisk oppositionell}, pp. 65-97. For a comprehensive index of the articles written between 1964 and 1968, see Schwarz, David (1971) \textit{Svensk invandrar- och minoritetspolitik 1945-1968}, pp. 111-113.
\textsuperscript{798} Román, Henrik (1994) \textit{En invandrarpolitisk oppositionell}, p. 9
\textsuperscript{799} Ibid., p. 15.
Minister of Trade, had published an explorative article titled “Foreign Labour?” in the newspaper Aktuell.  

In this article, he advocated the use of labour immigration to fill labour shortages which had started to appear and threatened to slow the country’s economic growth; citing Switzerland, Germany and Sweden as successful examples. Indeed, whilst between 1951 and 1960, Nordic workers made more than 60% of all foreign workers in Sweden, by the end of the 1960s, they constituted less than 50%. Labourers from the former Yugoslavia, Greece and Turkey had become major components of the workforce. It is not until 1967 that non-Nordic guest workers started to arrive in Denmark mainly from Turkey, former Yugoslavia and Pakistan. Most did not even come as recruits but officially on tourist visas and once inside the country sought employment.

The second major difference is the adoption of a guest worker system in Denmark which didn’t happen in Sweden. While the guest worker’s system had no significant impact on immigration policy, as—in practice—both governments behaved similarly toward foreign labour, it was an important institutional difference in terms of integration because it made the idea of a settlement policy in Denmark obsolete. Yet the majority of these guest workers remained in the country after judicial courts adjudicated in their favour. Swedish policymakers had predicted that a small proportion of foreign workers and their families would stay in the country and relaxed residency permits rules.

These immigrants belonged to the Swedish society and were entitled as such to rights and to make claims about these rights. This claim making right, so to say, together with the existence of a social cleavage (the alleged deprivation of immigrants), provided the political opportunity structure (POS), that a policy entrepreneur like Schwarz used, to mobilize the issue.

Without such a POS, even in the presence of a charismatic policy entrepreneur similar to Schwarz, multiculturalism would have never been politicized in Denmark. That said - politicization was only one condition. Following Kingdon’s theory, two other conditions were

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801 Jensen, Bent (2001) Foreigners in the Danish Newspaper Debate from the 1870s to the 1990s, p. 33.
802 Ibid.
804 This phenomenon called “tourist immigration” was the consequence of the tightening of immigration rules in neighbouring Sweden and Germany following the slow down of their economies. Andersen, Karen (1979) “Gæstearbejder – Udlænding – Indvandrer - Dansker !”, p. 13.
807 Hammar, Tomas (1985) “Sweden” in European Immigration Policy, p. 28
necessary. The first was a contingency or a sudden change in the political environment. There was seemingly a need for such a change in Denmark since, as mentioned before, politicians had avoided cultural policymaking after the Rindalist uprising in the mid-1960s. Second was the availability of a policy solution. One of the Rindalist protesters’ grievances was the formulation of a cultural policy which took into account their own values and norms: in other words, a policy which deals with the anthropological aspects of culture.

5.2 Two Contingent Events: The Government Reshuffles of 1967 in Sweden, and 1968 in Denmark

Kingdon predicates that a random event must occur in the political environment, making this environment more favourable for a policy idea to be adopted. The relevant question thus is: did a contingent event modify the political landscape, allowing a new cultural policy in general, and a multicultural policy in particular, to take root? In Denmark, as described previously in this chapter, after strong reactions from artists and the Rindalist movement against the government’s action to “democratize culture” in the mid-1960s, no politician wanted to test the waters again. Hans Sølvhøj, who was Minister in charge of Culture from 26 September 1964 to 28 November 1966, and Bodil Koch, from 28 November 1966 to 2 February 1968, did not show much enthusiasm either. Sølvhøj’s key policy signature was the Report to the Parliament on the Situation and Prospects of Radio Denmark which he had directed before becoming Minister. Koch was more concerned with the creation of cultural centres, a burning issue in the public media. In Sweden Ragnar Edenman, the Minister in charge of Culture of the time, was lukewarm to this idea. His main interest lay in educational reform per se rather than cultural reform and he was more inclined to the preservation of high culture. Two contingent events would soon affect this status quo.

5.2.1 The Appointment of Olof Palme in Sweden

In August 1967, Sweden’s Prime Minister, Tage Erlander, undertook a government reshuffle in which he appointed Olof Palme, the Minister for Communications in the previous government (1965-1967) as Minister in charge of Culture in lieu of Ragnar Edenman. Coincidentally, it was Edenman who had introduced a young Palme to Erlander, 14 years

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810 He was Minister in charge of Culture from 1957 to 1967.
earlier when he was avidly looking for an efficient aide. Palme had quickly gained Erlander’s trust and admiration, and in the waning days of Erlander’s long reign had become his heir-apparent.

In January 1968, Palme held his first meeting with the Ministry’s “Kulturrådet” (Cultural Council), an unofficial group of eight cultural experts whose opinions were requested occasionally by the Minister. During the meeting, discussions centered on whether the Ministry should set up a commission of enquiry into the formulation of a state cultural policy, or run pilot experiments in municipal councils. Harry Schein, a trusted friend of Palme, proposed the formulation of a long-term policy with overarching goals, but another member, Sven Moberg, advised that such a project would be difficult to implement. Schein won the day.

On 29 November 1968, Palme issued a ministerial decree creating a commission of enquiry, also called “Kulturrådet,” in lieu of the old Council. Three main goals were assigned to the New Cultural Council in its terms of reference: the formulation of (1) a long-term state programme of action in the cultural sector, (2) a framework of cooperation between various levels of governments (central, regional and municipal) and other stakeholders, and (3) state measures in favour of workers in the cultural sector.

Paradoxically, despite the new Council proclaiming neutrality, many members of the ministerial advisory group who attended the initial meeting were included and, together with other ministry officials, became the dominant faction. Its president, Carl-Johan Kleberg was an official of the Ministry as well as Bengt Lindroth. Roland Pålsson, the chief of the Cultural Division, and Harry Schein, both friends and tennis partners of Palme were members. Schein and Palme had been tennis partners for over 20 years and as Schein discloses in his


813 He resigned 2 years later in 1969 after being in power for 23 years.


815 The Council was set up in 1962 by Ragnar Edelman as a consultative board and for selecting artists who would become recipients of state financial support. It was made up of Torsten Eliasson, an educator; Karl-Birger Blomdahl, head of the music department at Swedish Radio; Karl Vennberg, editor of the cultural section of the newspaper *Aftonbladet*; Sigurd Persson, a silversmith; Harry Schein, a journalist and intellectual; Lennart Holm, an architect; Lage Lindell, a painter, and Sif Ruud, an actress.


818 Hereafter I use the terms “old” and “new” in order to differentiate both councils.


autobiography, no one outside Palme’s family circle had been closer to Palme than him, although he admits that his influence on policy making was limited to the film sector.

The Council’s work on these policy goals was divided into three sections: Political Parties’ Cultural Policies, Policy Goals, and Academic Literature Review. Each section was drafted by an expert. Erik Gamby, a journalist with Upsala Nya Tidning, the newspaper of a university town situated 70 km from Stockholm, reviewed political parties’ manifestos, Bengt Lindroth, an official of the Ministry, drafted the policy goals, and Sven Nilsson, then writing a doctoral thesis, reviewed the academic literature.

5.2.2 The Appointment of Kristen Helveg Petersen in Denmark

In Denmark, on 2 February 1968, the Social Democrats were defeated in the general election. Kristen Helveg Petersen, a Radical Liberal, was appointed the new Minister of Cultural Affairs in the new government coalition headed by a fellow Radical Liberal, Hilmar Baunsgaard. In April 1968, barely two months into office, Petersen initiated the drafting of the White Paper which was intended, according to him, to provide the basis for a comprehensive “fyldig” debate on cultural policy.

The project was divided into two parts. The first consisted of a review of the sectors of activities falling under the responsibility of the Ministry of Cultural Affairs: the preservation of historical buildings and natural sites, artistic education, support to artists’ activities and matters relating to media of cultural expressions such as museums, libraries, cinemas, archives, and so on. It was drafted by teams of the Ministry’s bureaucrats with occasional help from external consultants. The second part cast a look into the future and considered possible policy goals. Investigations for this part were undertaken by outside experts appointed by the Minister.

Like Olof Palme, Kristen Helveg Petersen had a sustained interest in the formulation of a new cultural policy. Even if they employed different policy making modes (a commission of enquiry as against a White Paper), these differences were not substantial. For example, both Commissions relied on outside experts and bureaucrats and fell ultimately under the influence of their Minister. Petersen was even anxious about cultural policy renewal. In the preface of the

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821 Ibid., p. 136.
822 Ibid., p. 203.
824 Ibid., pp. 143-147.
825 He was also in charge of Technical Cooperation with Developing Countries and Disarmament.
827 Ibid.
828 Ibid.
White Paper, he wrote “Time has been short. Work started in April 1968 and the main objective has been to put in a platform as soon as possible which can give way to a broad debate.”

Petersen’s sense of urgency can be explained by different but non-exclusive factors: The Cultural Revolution was raging throughout Europe and Denmark. Youth were protesting against the establishment and asking for more freedoms. There was as such an added pressure for policymakers to act. Perhaps more importantly, Petersen was the first Radical Liberal Minister to become Minister of Cultural Affairs. Since the Historic Compromise on Culture which the party had helped usher in, it had viewed itself and been viewed by the rest of the society as the torch-bearer of cultural policy in Denmark. Thus, no one was better positioned than a Radical Liberal Minister of Culture and a Radical Liberal Prime Minister to start such a reform programme.


According to Kingdon, the third determinant of agenda setting is the availability of a policy solution. As discussed in Chapter Two and in the introduction to this chapter, the relevant question is whether a multicultural policy was available to policymakers. Two similar cultural policy projects were begun almost simultaneously in 1968: the Danish White Paper 517 and the Swedish SOU 1972:66. In both countries, policy drafters agreed to avoid an academic definition of the word culture, indicating that it was difficult to arrive at a consensus, and trying to do so would lead to controversy. However, they substituted:

the narrow concept of culture in the policy of the 1960s, in which culture was synonymous with art, with an inclusive concept of culture… defined as anthropological, pluralist and proactive, ‘a process in which we all take part’.

This new approach was embodied in the concept of “cultural democracy” which went beyond culture as aesthetics (drama, music, museum, film, literature and so on) to encompass beliefs, norms, values, practices and other emanations from the society. This was a solution to the previously decried ‘top-down’ paternalist approach of the early 1960s which consisted in

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829 Ibid., p. 4.
830 Interview with Hanne Sanders, 1 July 2008.
the dissemination of arts (high culture) to lower classes through the democratization of culture.\textsuperscript{832}

Both countries introduced similar policy goals: international cultural cooperation, independence of artists from commercialism, equal access to cultural goods, preservation of cultural heritage and cultural renewal.\textsuperscript{833} Their mechanisms of implementation were quality, decentralisation, and the “arm’s length principle”, a new funding principle by which the State was allowed to “fund but not intervene” in cultural projects in order to safeguard the independence of artists. Yet while immigrants’ cultures featured prominently in the Swedish policy document, they were conspicuously absent in the Danish policy document.

5.3.1 The Paradox of White Paper 517: Yes to International Cultural Exchanges, No to Immigrants’ Cultures

When dealing with foreign cultures, the Danish White Paper 517 stated that foreign cultural and artistic expressions would inspire national artists and entertain the local public, while representations of Danish cultural productions abroad would subject them to comparison, discussion and evaluation.\textsuperscript{834} It reflected that this occurrence was only natural considering the fact that other cultures such as English, French, German and American had left their mark on Danish culture throughout time. The country had signed multilateral agreements on cooperation with the Nordic Council, the European Council and UNESCO, and bilateral agreements with countries such as Czechoslovakia (1937 and 1964), Italy (1956), Belgium (1957), Poland (1960), the Soviet Union (1962), France (1967) and Romania (1967).\textsuperscript{835}

The objective was rather to expand these cultural exchanges to Third World countries whose cultures were considered inferior. The White Paper lamented for example that an Indian movie is systematically rated as less artistic and entertaining than a French or American movie.\textsuperscript{836} Yet it did not give consideration to immigrants’ cultures. While one could explain this absence as being in the problem stream by the non-existence of a large community of immigrants, the absence of a policy entrepreneur and Denmark’s application of a guest worker’s system, these factors do not explain the paradox that Danish policymakers...
wanted so much to strengthen international cultural exchanges but—even as immigrants’ numbers grew—they continued to sideline their cultures within Denmark.

For instance, after the return of the Social Democrats to power in 1971\textsuperscript{837}, Niels Matthiasen\textsuperscript{838} the new Minister of Culture made no reference to immigrants’ cultures in his policy speech to the Folketing\textsuperscript{839}, even though labour immigration stopped in 1973 during his term as the economic recession and the global oil crisis unfolded.\textsuperscript{840} A more convincing explanation is that Danish policymakers bore negative priors toward multiculturalism. First, Matthiasen and his collaborators were aware of the debate over multiculturalism and its development in Sweden. White Paper 517 and SOU 1972:66 cross-referenced each other.\textsuperscript{841} Cultural policy officials in both countries were in regular contact and by law were required to consult each other.\textsuperscript{842} Thus to paraphrase Kingdon, multicultural policy floated around.\textsuperscript{843}

Second, there was a non-ideological consensus among parties on the cultural integration of immigrants as illustrated by the similar positions held by the Social Democrats and Radical Liberal ministers. In fact, Petersen, although a member of the Radical Liberal Party, had been Minister of Education in preceding government coalitions led by the Social Democrats.\textsuperscript{844} In the Radical Liberal Party’s programme published in 1969, the same year as the White Paper 517, one finds no mention of the support for minority groups’ cultures.

In the cultural policy section of the programme, the Party purports to foster socioeconomic equality in order to attain cultural equality.\textsuperscript{845} Then it aims to provide to foreign spouses of Danish women the same civil and social rights afforded to the foreign spouses of

\textsuperscript{837} The third government of Jens Otto Krag.
\textsuperscript{838} He stayed on when Anker Jørgensen replaced Krag in 1973.
\textsuperscript{839} He took up this mode of policy making again.
\textsuperscript{840} This is contrary to Sweden, where the trade unions pressured the government and it moved to put an end to labour immigration.
\textsuperscript{841} The Swedish drafters of SOU 1972:66 opined that the Danish White Paper had mapped out problems within several cultural sectors but failed to propose overarching policy goals. They were appreciative of the progress made in that sense in Norway. SOU 1972:66, p. 107. They mentioned that they had consulted Danish, Finnish, Norwegian and French officials. See SOU 1972:66, p. 23.
\textsuperscript{842} In the 1960s, they operated a common investigative and advisory arm, the Nordiska Kulturkommissionen (NKK). It was replaced by an agreement on cultural cooperation in 1971 which required Nordic governments to share information and experiences in the execution of their national cultural policy goals, cultural education, research funding and policy development. To that effect, a Secretariat for Cultural Cooperation was instituted in 1972. The agreement was even incorporated in a Swedish Government bill, Prop. 1971:54. For details see SOU 1972:66, p. 105.
\textsuperscript{844} The second government of Viggo Kampmann (1960-1962) and Jens Otto Krag’s first government (1962-1964).
Danish men. It also seeks to give support to the inhabitants of South Schleswig\textsuperscript{846} so that they can continue to enjoy Danish cultural and religious life. Lastly, it also seeks to increase cultural cooperation between Denmark and underdeveloped countries.\textsuperscript{847} These policy lines were shared by other political parties.\textsuperscript{848} As Hanne Sanders explains, the main policy difference between the Radical Liberals and other mainstream parties on cultural policy has been the acceptance by the former that minority cultures coexist side-by-side with a dominant national culture. They draw their political inspiration from Grundtvig’s neo-Herderian acceptance of plural but exclusive cultures.\textsuperscript{849}

5.3.2. SOU 1972:66, the Section on “Disadvantaged Groups”

The Swedish policy report SOU 1972: 66 which became the foundation of Prop. 1974:28 was produced in two parts: SOU 1972:66 “Ny kulturpolitik Del 1: Nuläge och förslag”, the main document; and SOU 1972:67 “Ny kulturpolitik Del 2: Sammanfattning”, the summary of the first document. SOU 1972:66 dealt with the arts including film, libraries and museums as in previous policy documents (MUS 1965), but, more remarkably, it also examined overarching policy goals and the situation of immigrants.

It disclosed that the cultural situation of immigrants was grim. Immigrants were socially and culturally isolated from the society because of their poor Swedish language skills and their lack of knowledge of the way the Swedish society functioned. They also lacked the means of preserving their own cultural traditions. The country’s previous initiatives had been geared toward state cultural institutions and had ignored the numerous communal associations whose activities helped to sustain cultural life in these disadvantaged groups. Finally, the previous policy provisions did not offer to immigrants and other disadvantaged social groups, the opportunity to enjoy their culture.\textsuperscript{850}

As such, the report proposed—in two sections called “Insatser för eftersatta grupper” (Measures for disadvantaged groups) and “Gemenskap och aktivitet” (Community and Activity)—a set of solutions which, it said, was drawn from the experiences of immigrants and other disadvantaged groups (the mentally impaired, people suffering from disabilities and those

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\textsuperscript{846} The southern part of Schleswig, a former Danish territory populated by both German and Danish speakers which remained under German jurisdiction, as opposed to Northern Schleswig, following the referendum of 1922.

\textsuperscript{847} Ibid.


\textsuperscript{849} Interview with Hanne Sanders, 1 July 2008. This aspect is examined in depth in the next chapter on the nature of Denmark’s cultural integration policy; namely the section on “Mutual Toleration.”

\textsuperscript{850} SOU 1972:66, p. 293.
living in rural areas).\textsuperscript{851} The bill proposed the “systematic” monitoring of immigrants’ cultural situation\textsuperscript{852} and stated that any future policy, as a priority, shall provide to immigrants and, for that matter, to other disadvantaged groups, the means of carrying out their own cultural activities. Practically this meant providing financial support to cultural associations which, in light of their close links and wealth of experience with immigrants, were considered as the most effective channels or mechanisms of implementation.\textsuperscript{853} In the mean time, state institutions were advised to give to these associations as much autonomy as possible in the management of their affairs.\textsuperscript{854}

In 1972, the New Cultural Council submitted the Report, SOU 1972:66 to Ingvar Carlsson, who had replaced Palme in 1969 as the Minister in charge of Culture when Palme had become Prime Minister. Carlsson became Palme’s closest collaborator and his future successor.\textsuperscript{855} But he was more interested in school policy rather than cultural policy which he said “took too much of his time.”\textsuperscript{856} As such, there had been no real change to the ongoing enquiry carried out by the New Cultural Council. The report recommended government support and recognition of minorities’ cultures. Minorities were included among disadvantaged groups alongside the unemployed, handicapped persons and women.\textsuperscript{857} Carl-Johan Kleberg who headed the Commission disclosed that it was Palme himself who asked experts to include immigrants among disadvantaged groups.\textsuperscript{858}

Thereafter the Report was submitted for consultation, “remissomgång,” to 450 key organizations from churches to cooperatives and workers organizations which in turn consulted their member organizations. The opinions emanating from the civil society covered about 5000 pages.\textsuperscript{859} With regard to immigrant groups, most respondents agreed with the government’s aims but pressed it for concrete measures.\textsuperscript{860} *Skolöverstyrelsen* (Swedish National Agency for

\textsuperscript{851} Ibid., p. 299.
\textsuperscript{852} Ibid, pp. 299-300.
\textsuperscript{853} Ibid., p. 297.
\textsuperscript{854} Ibid., p. 300.
\textsuperscript{855} In October 1969, Olof Palme replaced Tage Erlander as Prime Minister. Carlsson was replaced by Bertil Zachrisson in 1973. Carlsson became Deputy Prime Minister from 1982 and Prime Minister after Palme’s assassination in 1986, until 1991.
\textsuperscript{858} Telephone interview 11 July 2006. Kleberg is arguably the most resourceful person alive on Swedish cultural policy. A longtime high official of the Ministry of Culture, he was active for many decades at the national and international level, namely UNESCO, to the point of becoming the eponymous face of Swedish cultural policy. An insightful *festschrift* was published on the occasion of his 80th birthday by Sevëus, Valentin; Kleberg, Olof and Vahlquist, Gudrun (2009) (eds.) *Carl-Johan Kleberg*, Stockholm: Sevëus & Co.
\textsuperscript{860} Prop. 1974:28, p. 41.
Education), *Statens invandrarverk* (Swedish Immigration Board), and *Författarcentrum* (the Writers’ Centre) even claimed that it had not dealt properly with immigrants’ problems.\(^{861}\) SÖ expressed the wish that the state ensures immigrants’ opportunities to enjoy their culture as well as promote shared activities with Swedes and national minorities in order to overcome barriers between groups.\(^{862}\)

The Swedish Immigration Board recommended that the government provide help to immigrants for the preservation of immigrants’ cultures as soon as they arrive in the country in order to prevent any cultural loss. To that effect, the government should ensure the representation of immigrants in any new institution it plans to create and provides a stronger support to the cultural activities of immigrants’ associations.\(^{863}\) The Enquiry of Integration, *Invandrar Utredningen* which led to Prop.1975:26 advised that all immigrants’ cultural problems could not be resolved within the cultural sector. For example, if the state wanted to facilitate immigrants’ access to cultural services and goods, it would first need to address their problems with Swedish language acquisition and their own national languages.\(^{864}\)

*Invandrarnas kulturcentrum* (Immigrants Cultural Centre) requested the creation of a cultural fund in support of linguistic minorities as well as a portion of the state’s cultural investments for the implementation of policy goals according to the percentage of immigrants at the national, regional and communal levels.\(^{865}\) The belief that immigrants were among the truly disadvantaged and needed a thriving culture of their own for their well-being is a defining characteristic of multiculturalism as discussed in Chapter One on the theories of assimilation and multiculturalism. And this was mentioned unequivocally in the very first paragraph of the government bill, Prop.1974:28 submitted on 8 March 1974 to the Riksdag by Bertil Zachrisson:

The following goals are proposed. Cultural policy shall give as much as possible consideration to the needs of disadvantaged groups. Cultural political initiatives shall aim to protect freedom of expression, the negative impact of commercialism in the cultural sector and give to the public the means to practise their own creative activity. The Bill establishes shared responsibility between the State, the municipal councils, the regions and associations. The active role of these associations is highlighted. An innovation is the recognition given to creative artists.

\(^{861}\) Ibid., p. 40.
\(^{862}\) Ibid., p.p. 40-41.
\(^{863}\) Ibid., p. 41
\(^{864}\) Ibid., p. 40-41.
\(^{865}\) Ibid.
Altogether in Sweden, the three streams (problem, contingency, and solution) enunciated by Kingdon, were effectively present. However, they did not function in conformity to Kingdon’s prediction. One stream was independent (problem) while the two others were interdependent (contingency and solution). The politicization of multiculturalism in Sweden started by David Schwarz had no impact on contingency and solution except for calling on policymakers’ attention. Change did not occur until four years later with the appointments of Olof Palme and Kristen Helveg Petersen. Without their presence, none of the policies produced at that time would have emerged.

This is evidence which shows that there is even more flexibility in the way the three streams function. They are not exclusively independent as Kingdon suggested or dependent as his critics argued. As the Swedish case illustrates, one or two streams can be independent while the rest are dependent. Following this, it appears also that a policy entrepreneur is not necessarily the vital link between the three streams as suggested by Kingdon. Other kinds of agents and their ideational assumptions can influence developments especially in the solution and contingency streams. The behaviours of Olof Palme and Kristen Helveg Petersen in fact lend support to arguments about the role of agents and ideas in policy change.

5.4 The Impact of Priors: The 1953 Historic Compromise on Culture in Denmark and Olof Palme’s Beliefs

The reason why Petersen and Palme made different cultural integration policy choices, despite formulating similar cultural policies, resides in their contrasted priors. Priors as discussed in Chapter Two are moral maps which guide policymakers through the decision making process. Olof Palme held priors which were positive to multiculturalism before and during the formulation of the policy. In Denmark, these priors were negative and so widely shared that they had become norms. Indeed, they were steeped into history, the 1953 Historic Compromise on Culture whose ideological thread as shown in Chapter Three goes back to Grundtvig and even Herder.

5.4.1 From Policy Legacy to Ideas-Frames: The 1953 Danish Historic Compromise on Culture

As described in Chapter Three, the 1953 Historic Compromise on Culture was a fusion between the SDP’s international worker’s culture and the Radical Liberal’s nationalist and atomistic views on culture. However, the nationalist and individualistic dimensions became prevalent, while the old international worker’s culture was “reincarnated” by the new concept
of international cultural exchanges. By the late 1960s, this nationally-oriented aspect of the Danish cultural policy, which Peter Duelund described as pluralism within the national “strait-jacket,” had become a frame that guided Danish policymakers’ actions.

In the Radical Liberal Party’s programme published in 1969, the same year as the White Paper 517, one finds no mention of support for minority groups’ cultures. Although the cultural policy section of the Party’s programme purports to foster socioeconomic equality in order to attain cultural equality, to provide to foreign spouses of Danish women the same civil and social rights afforded to those of Danish men, give support to the inhabitants of South Schleswig, so that they can continue to enjoy Danish cultural and religious life, and increase cultural cooperation with underdeveloped countries.

These policy lines were similar to those of other political parties’ programmes across the political board. This remained true even with the return of Social Democrats to power in 1971 under the leadership of Jens Otto Krag and with Petersen’s successor, the Social Democrat, Niels Matthiasen’s switch to a new “mode” of policy making: policy speech to the parliament. Yet he omitted immigrants’ cultures too, even though it is during his term in 1973 that the government (now led by Anker Jørgensen) stopped labour immigration as the economic recession and the global oil crisis unfolded.

These omissions were deliberate. Even as conditions changed in the policy streams, actors continued to avoid multiculturalism and hold to their priors. Therefore these priors were adverse to multiculturalism. First, Kristen Helveg Petersen and his collaborators were aware of the debate over multiculturalism in Sweden and its policy development in Canada. Second, there was a non-ideological consensus among parties on the cultural integration of immigrants as illustrated by the similar positions held by Social Democrats and Radical Liberal ministers. In fact, Petersen, although a member of the Radical Liberal Party, had been Minister of Education in previous Social Democrat-led government coalitions.

From 1973 to 1993, none of the successive Ministers of Culture who presented their policy goals to the parliament took up immigrants’ cultures. It is only in 1996, 20 years after

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866 The Radical Liberal Party was on the left in the 1960s. Today it has mutated into a centre-left party. But it was founded in 1905 as a splinter group from the Current Danish Liberal Party (venstre).
869 Ibid.
871 This is contrary to Sweden, where the trade unions pressured the government and it moved to put an end to labour immigration.
the end of labour migration and 27 years after a fully fledged national policy was introduced in Sweden, that Jytte Hilden then Minister of Culture formulated an ethnocultural policy.

Despite his exceptional contribution to the development of Danish Cultural Policy and indeed renouncing the Workers’ Culture which he had authored in the early 1930s, Julius Bomholt was never forgiven. For the rest of his life, he was associated with the bad type of cultural policy as Henning Rhode recounts:

As for how the Social Democratic leadership and the party saw Bomholt efforts as Minister of Culture, I saw further evidence a few years later when Bomholt, then the Speaker of the Folketing celebrated his 70th birthday on 11 June 1966. Social Democrats have held a banquet honouring him at Christianborg. Krag [the Prime Minister] spoke of his achievements as the Chairman of Radio Denmark, as Minister of Education and now as Speaker of the Folketing. Thereafter, the President of the Socialist Democratic Group in the Folketing Carl Petersen heaped the same praise but no one said a word about Bomholt’s achievements in the cultural sector… Bomholt had invited me and my wife to the party. I wondered, since we were right into the dessert, how strange it was that none of the speakers had said a word about what he should be remembered for: his great work in the cultural domain. If today we have a live theatre, a growing film industry… we should thank Bomholt who was the driving force behind those legislations.

We have not had a politician so involved in cultural policy such as Bomholt in Denmark during this century. A few years later, on 2 January 1969, Bomholt died and was buried in Sonderho in Fanø where he spent his last years. I went to his funeral, which was attended by many representatives of the government and a group of his former parliamentary colleagues. At the reception in Sonderho Hotel, Jens Otto Krag held a eulogy for Bomholt but again, nothing was said about his work in cultural policy. For me, it was such a shame that I repeated the speech I gave at his birthday.

While Rohde mentioned the legislations that Bomholt had initiated, he could not bring himself to mention his worker’s culture. However, with these negative priors and even if the issue was problematized, the structure of gatekeepers based on a single gatekeeper aligned sequentially (the central role played by the Minister of Culture and his exclusive power over the formulation of policy goals) made the likelihood of the adoption of multiculturalism extremely difficult.

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5.4.2 Olof Palme in Sweden: An Activist Gatekeeper

“What would have cultural policy in Sweden been without Olof Palme?” asked Harry Schein. Indeed, Olof Palme was—among all Swedish Ministers in charge of Culture in the 1970s—the most enthusiastic about cultural policy. In his capacity as Minister in charge of Culture, he initiated the policy bill and as head of government was ultimately responsible for its submission to the Riksdag. Until he asked the New Cultural Council to include immigrants among disadvantaged groups, they were virtually absent from any existing literature on cultural policy. Multiculturalism is mentioned in the cultural policy section of Social Democratic Party’s manifesto for the first time in 1969. That is a year after the appointment of Olof Palme as Minister in charge of Culture.

However, Palme was not a policy entrepreneur like David Schwarz who, in the words of Kingdon, would be “willing to invest [their] resources - time, energy, reputation, money - to promote a position in return for anticipated future gain in the form of material, purposive, or solidarity benefits.” Schwarz ushered in the idea of multiculturalism but had no authority to implement it. Olof Palme adopted it after the beginning of the debate and saw it materialize when he became Minister. While immigrants’ integration issues were the focus of Schwarz’s life struggle, these were only a small part of the 480-page Cultural Policy Bill formulated by Palme and would not be fully implemented until the 1990s.

Palme’s role can be described more accurately as that of a gatekeeper albeit an active one: an activist gatekeeper. When he was appointed Minister in charge of Culture in 1967, he became a gatekeeper with the authority to accept or reject the policy idea. He chose to implement it as illustrated by his decision to formulate a general cultural policy during his first official meeting with the Old Cultural Council in January 1968. But he was more than a simple gatekeeper sitting at the entrance gate and waiting for a policy to come as defined by Bleich. More like Berman’s carrier, he was mobile and active. He personally asked the New Cultural Council to include immigrants among disadvantaged groups in their report, SOU 1972:66. And as we will see, he loomed large over the Social Democrats’ support for multiculturalism in the Riksdag in 1974.

The reason why he adopted multiculturalism is to be found in his priors. These priors were favourable to multiculturalism and as predicted by Bleich, were present before, during, and after the passage of the policy. They came from his personal and social experience. He was

descended from immigrants. His mother was of German Balt ancestry and came to Sweden as a 
refugee, and his father was descended from a Dutch ancestor who gave his name to the clan.  
More importantly, although he was born into a wealthy family, he had been saddened by the 
racial segregation which he witnessed as a student in the USA, the socioeconomic cleavage 
he observed between the USA and Mexico during a visit in the latter in 1948, and colonization 
during a tour of India, Ceylon (current Sri Lanka), Burma, Siam, Malaya (current Malaysia) 
and Indonesia in 1953.

According to Bertil Östergren, his conversion to social democracy or radicalization 
holds from this period. In 1949, he married a Czech student only for the purpose of helping 
her to emigrate. Lisbet Palme, his widow, affirmed that if he was alive today, the one cause 
that he would be championing would be refugees’ rights. Already in 1965, as the newly-
appointed Minister of Communications, he broke with tradition by using his first address to 
Swedes abroad on Christmas Day to talk about immigrants in the country. This was barely a 
year after David Schwarz had started the debate on the immigrants’ situation in the daily 
Dagens Nyheter and in direct contradiction with the stances held by most Social Democrats 
in the government and the parliament at the time. Palme’s speech was a sterling analysis of 
the issues surrounding the situation of immigrants.

First, he provided a background to the situation. He cited the push and pull factors 
behind immigration such as persecution, strife, the search for better education and work. He 
also provided the number of immigrants (400,000), its share of naturalized citizens (150,000) 
and discussed its growing diversification (from Nordic to southern European, Africans, South 
Americans and Asians). Then he exposed the problems faced by immigrants due to prejudices 
and their sources, racism, the blame game and most of all, isolation and loneliness. He 
encouraged Swedes to practise internationalism not just abroad but at home, by opening the

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878 He writes that he sat in a place reserved for coloured people in a bus during a trip in Laurel, Mississipi, and 
refused to leave in 1948, long before the civil rights movement was triggered by Rosa Parks’ refusal to leave her 
‘whites-only’ seat in a segregated bus. Ibid., p. 177.
879 Ibid., pp. 57-58.
880 Some authors affirm that his engagement started during his school days under the influence of his mother. 
accessed 3 March 2010.
884 The opposition of Social Democrats to state funding of ethnic and religious schools.
doors of their houses to immigrants. This was two years before the publication of Schwarz’s article “Internationalism at Home Too” on the same topic in the newspaper Aftonbladet.\footnote{Palme, Olof (1965) Tal till utlandssvenskar Juldagen 1965 i radion, Arbetarrörelsens arkiv och bibliotek, pp. 1-4.}

Concerning their cultural integration in particular, he declared that while it is legitimate for Swedes to expect immigrants to adjust to the society, “anpassning”, they should not expect the latter to be “like” them. Therefore, even as these immigrants try to become full and active members of the society, many will seek to preserve their roots and will end up being a different kind of Swede. “Is it presumptuous?” he asked.\footnote{Ibid., p. 5.} Then comparing the pride that Swedes feel over the achievements of Swedish-Americans in their new land and with the efforts of these Swedish-Americans to maintain ties with the home country, he argued that immigrants to Sweden should be given the same opportunity to preserve their cultures.

Remarkably, he asserted that the values instilled by immigrants would “enrich” the country and their cultures would provide a much needed stimulus for culture diversity.\footnote{Ibid.} This idea conforms to the definition of the celebration of difference as mentioned in Chapter One, and was later incorporated in the policy bill, Prop. 1974:28.

Social Democrats’ opposition to the authorization of state funding for ethnic and religious schools was certainly a cruel dilemma for him. On the one hand, he had to commit to government solidarity which his mentor Tage Erlander cultivated.\footnote{Ruin, Olof (1990) Tage Erlander: Serving the Welfare State, p. 116.} On the other hand, he was also a true believer for whom “socialism was concerned with social levelling and equality... [his] vision of society was that the society should do everything necessary to achieve its goals.”\footnote{Nilsson, Macke (1972) Samtal med Olof Palme. Det gäller våra jobb och vår miljö i alla delar av landet, p. 23.} Having to choose between opening the Pandora box that Social Democrats in the parliament claimed the provision of state funding to private schools represented\footnote{See the previous section on the politicization of the issue.} and giving to immigrants their cultural rights, he chose the latter. During the formulation of the cultural policy, among all influential personalities, Palme was the most concerned by equality.\footnote{Roland Pålsson and Harry Schein were the two other personalities. Hoogland, Rikard (2005) Spelet om teaterpolitiken, p. 38.}

After becoming Prime Minister and while the enquiry was still under way, Palme continued to garner public support for multiculturalism. Immigrants’ issues were the highlight of his May Day address in 1971, the second only as Prime Minister. He devoted the first four pages to immigrants.\footnote{The rest of speech dealt with well-rehearsed themes: social and economic equality, suffering and war in Cambodia, Vietnam, apartheid in South Africa, dictatorship in Greece, and the labour market situation.} Similarly to his 1965 “Address to Swedes Abroad” and using words
which resonate well with today’s situation, he called on Swedes not to succumb to xenophobia
despite the acts of terrorism and violence which were committed around the world.\textsuperscript{893} Despite
the problems caused by immigration, he said that the country’s institutions, the society and
each Swede had the duty of easing the integration of immigrants.\textsuperscript{894} Lastly, he affirmed that
immigrants should feel welcome and from that May Day, know that Sweden “can be\textsuperscript{895} their
home”.\textsuperscript{896}

The year after the adoption of the bill, at the 22nd Congress of the SAP in 1975, issues
concerning immigrants were included for the first time in the Party’s plan of action. In point
No 24, it was stated among other provisions of a more socioeconomic nature that:

\begin{quote}
Immigrants should be provided education in the mother tongue in preschool and
compulsory school. Linguistic barriers to participation in education shall be
eliminated. Support shall be given to immigrants’ own cultural activities as well
as the exchange of cultural activities between Swedes and immigrants.\textsuperscript{897}
\end{quote}

According to Enn Kokk, who was the Congress’ General Secretary from 1975 to 2000,
it was the most far-reaching and democratic congress from the Party’s inception in the late 19\textsuperscript{th}
century to 2000, and Olof Palme’s shadow loomed large over it. He presided over the Party’s
Commission on Future Policy which drafted the 1975 policy platform. The latter was written in
the spirit of the time. It was more reformist and innovative than previous ones and cemented
freedom, equality, and solidarity as social democracy's core values.\textsuperscript{898} These core values, as
one observes, resemble the three integration policy goals but differ as well, regarding the
freedom goal.

\section*{5.5 The Passage of the Swedish Bill (Prop. 1974:28) in the
Parliament: A “Curious” Veto Point}

Owing to the sequential nature of the decision making structure in Sweden, a government bill
needed to obtain approval from the parliament. Following Ellen M. Immergut’s veto point

\begin{itemize}
\item \textsuperscript{893} Palme, Olof (1971) \textit{Första maj-tal i Finspång och Norrköping}, Arbetarrörelsens Arkiv och Bibliotek, pp. 2-3.
\item \textsuperscript{894} Ibid., p. 4.
\item \textsuperscript{895} Ibid. In the first draft, the speech was even more assertive. It is written “is”. In a subsequent revision, the
word was struck and replaced by “can”.
\item \textsuperscript{896} Ibid., p. 4.
\item \textsuperscript{897} Misgeld, Klaus (2001) (ed.) \textit{Socialdemokratsprogram 1897 till 1990}, p. 99.
\item \textsuperscript{898} Ibid., p. 71.
\end{itemize}
analysis of the Riksdag decision making process, two specific conditions needed normally to be met: party majority and party discipline. However, as demonstrated in the previous section, Social Democrats—in contrast to right-wing parties—had opposed multiculturalism earlier. They feared that it would undermine the egalitarian nature of their welfare state project. Thus, party discipline rather than party majority was the critical factor. It was a veto point unlike the one predicted by Immergut. Any threat to the government bill would come from its own party ranks

5.5.1 Virtual Unanimity in the Standing Committee on Culture

The Riksdag’s structure had changed in 1970 from a bicameral to a monocameral system. Following Helen Immergut, a veto point was possible between the executive and the legislative arenas because the parliament could block, modify, or give assent to, a government bill depending on whether this government enjoyed a stable majority and parliamentary discipline. After the general election of 16 September 1973, Social Democrats held a simple majority in the Riksdag (156 seats out of 350) and in theory, needed to win over parliamentarians from across the floor, or enter into an alliance with another party, in order to garner enough votes to ensure the passage of the multicultural provision of the bill.

The bill, Prop. 1974:28, reached the Riksdag in March 1974. Surprisingly, during its handling by the Standing Committee on Culture, there was no opposition on the provision on immigrants. Among the 79 motions issued on the bill in general, only one, Motion 1974:1721 in its paragraph 5 “Yttrande 5” targeted immigrants. It was tabled by Lars Werner, an ombudsman by profession and a VKP-Left Communist party parliamentarian from Tyresö, a municipality south-east of Stockholm. Werner, with the support of other communist parliamentarians, asked the government to take specific measures to support immigrants’ cultures.

As one observes, the difference between communists and other parties was not ideological, but related to the strength of the decision. The most pertinent question perhaps is: what explains the Social Democrats’ change of heart? The answer again is the influence of Olof Palme. Unlike the bill on the authorization of state funding for private religious schools, the cultural policy bill was an initiative of their Prime Minister. As shown above, Palme launched and oversaw the bill project as Minister in charge of Culture and upon becoming head of government had the final word on it. Social Democrat parliamentarians could not challenge

900 KrU 1974:15, p. 14
the bill without undermining the stance and credibility of their own party on a policy which had the backing of both their Prime Minister and the opposition.

This means that, in general, only right-wing parliamentarians voted in its favour because they held priors favourable to multiculturalism. They had supported the provision of state funding to ethnic and religious schools. The Social Democrats support for the bill was more motivated by party discipline.

In reply to Werner’s motion, Bertil Zachrisson, the Minister in charge of Culture, reiterated the promise of the government to provide immigrants with the means and opportunities for taking part in Swedish cultural life as well as preserving their own identity through the practice of their own cultures. He added that the 1968 Enquiry on Integration, “Invandrarutredningen”, which was to release its conclusions later that year as well as the Enquiry on Literature about linguistic minorities, would propose detailed policy actions.901 The committee rejected Werner’s motion, arguing that the forthcoming results of the two enquiries named by the government, constituted a sufficient basis for the evaluation of the cultural needs of immigrants and other ethnic groups. The Committee also underlined the similarity between Werner’s motion and the promise made by the government to give a central role to immigrants’ organisations on their cultural affairs.902

5.5.2 Reservation 10: The Communists’ Request for Concrete Financial Measures in Favour of Multiculturalism

However, the Communists “dug in”. Gunvor Ryding, a factory worker from the region of Gothenburg, tabled a reservation (No 10) during the Parliament’s plenary session.903 Ryding declared that, similarly to children and adolescents, immigrants were more likely to be affected by the negative effects of cultural commercialism than other social groups. She argued that the existence of ongoing enquiries did not prevent the award of special grants to respective regional organizations, so that national organizations can support immigrants’ cultural activities.904

In the ensuing response, the Centre Party’s parliamentarian, Lennart Mattsson, a school principal from the same region, agreed on the need to follow up immigrants’ situation and giving them the means of practising their cultures. But he argued that, while for some groups

903 When disagreement persists within the committee, the minority writes an opinion, “reservation” which together with the majority opinion is subject to the vote of the entire chamber during the plenary session “arbetsplenum.”Sverige Riksdag (2007) Riksdagensfaktablad, Arbetsplenum-Beslutsplenum 5, Stockholm: Riksdagen Tricksexpedition.
904 Riksdagens Protokoll 1974, Nr 88, p. 44.
like disabled people, the Standing Committee was able to allocate specific means, for others like immigrants, it was not possible because another Commission of Enquiry was investigating the issue. In addition, *Studieförbund*, as the main organiser of cultural events could reach them through their networks. “Does the State really need to go into so much detail?” he lamented.905

Ryding replied that there was no doubt any decision could be revised in the future. And she was satisfied that Mattsson shared her concern for immigrants. But she emphasized that concrete financial proposals and measures were needed more than wishful thinking, if immigrants were going to receive the economic support necessary to preserve and practise their cultures.906 Mattsson retorted that the Enquiry on Integration was drawing toward its end and it would be wiser to wait for its conclusions. It was preferable not to make decisions that appear well-grounded but would reveal themselves to be mistakes later on. He declared:

> I am fully aware of the need to monitor the cultural situation of immigrants. We can learn a lot from them if they are given the opportunity to practise their cultures here. We should integrate them in our activities but also give them the possibility to take part in activities from their homelands. In that vein, immigrants will be able to maintain their cultural situation. It is so important and essential, and it bears upon many issues. For example local issues, library services, language, radio, theatre and music. All these areas assuredly must be monitored, but the Standing Committee has made it clear that it cannot do as Mrs. Ryding recommends now. However, there is consideration of it."907

Ryding said that she understood Mattsson’s latest arguments but added:

> I cannot understand how if we earmark financial resources now that will hurt immigrants and their cultural activities. After all, how the future will be, is determined by the resources we put in. Therefore, I think it is right to take a decision today.908

In his intervention, the Minister in charge of Culture, Bertil Zachrisson, declared that children and immigrants will continue to have a special place in future policy. Regarding immigrants, he said that:

> We now have a large number of immigrants in Sweden, and we must give them active support in their efforts to maintain and develop the culture they brought with them. I agree with what Mr. Mattsson from Lane-Herrestad said previously namely that their cultures enrich and inspire our own cultural development. We know that the encounter between Swedes and immigrants have led many times to conflicts - the mutual foreignness increases feelings of estrangement and the

905 Ibid., p. 46.
906 Ibid., p. 48.
907 Ibid.
908 Ibid.
difficulty to communicate with one another makes it difficult to understand each other at a deeper level… for a longtime, countries of immigration have thought that it was better to obliterate immigrants’ cultures as soon as possible and assimilate them as much as possible. Today, we understand that for people’s sake and the two cultures, a richer and differentiated cultural policy is beneficial. This does not mean that every problem has found a solution. Politics is like any other domain, the art of what is possible. But we have tried by all means here in Sweden to give the best opportunities to immigrants particularly their children. One cannot stress enough that it is a question of social solidarity and a society which does not take such a step, is undermining its own existence.  

However, Ryding pressed for a vote in plenary session which resulted in 295 votes against and 18 votes in favour of Reservationen 10. Therefore, the Standing Committee’s refusal to specify means for the cultural support of immigrants prevailed. The figure below depicts the process of adoption of Prop. 1974:28 in the Riksdag.

**Figure 8: The passage of Prop. 1974:28 in the Swedish parliament**

<table>
<thead>
<tr>
<th>Arenas</th>
<th>Moves</th>
<th>Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive</td>
<td>Stable Parliamentary Majority</td>
<td>No Veto Point</td>
</tr>
<tr>
<td></td>
<td>Right-Wing opposition is in favour of the Multicultural provision</td>
<td>The Bill was adopted</td>
</tr>
<tr>
<td>SOU 1972:66</td>
<td>Party Discipline</td>
<td></td>
</tr>
<tr>
<td>Commission of Enquiry</td>
<td>Prop. 1974:28</td>
<td>Social Democrats support such a Provision for the first time</td>
</tr>
<tr>
<td></td>
<td>Government Bill</td>
<td></td>
</tr>
</tbody>
</table>

5.5.3 Prop. 1975:26: The Controversial Freedom of Choice Goal and the Financial Measures that Never Came

History ultimately sided with Ryding. As she had predicted and as I showed in the previous chapter, the Enquiry on Integration of 1968 and its resulting bill, Prop. 1975:26, *Riklinjer för invandrarpolitik* (Guideline for an Integration Policy) dealt mostly with

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909 Ibid., p. 61.
910 Ibid., p. 121.
socioeconomic issues. It failed to take concrete measures for the cultural integration of immigrants. Meanwhile two bills containing concrete measures respectively on the film/literature sectors, Prop. 1975:20 “Regeringens proposition om den statliga kulturpolitiken 2”, and on artists’ provisions, Prop. 1975/76:135 “Om den statliga kulturpolitiken 3”, were passed in 1975 by the Riksdag. Prop. 1975:26 dealt instead with the labour situation of immigrants as shown previously in Chapter Four. State support for immigrants’ cultures remained diffused and mainstreamed into the general cultural policies of the Ministry in charge of Education and Culture and decentralized administrations (regions and municipal councils).

Concrete measures would not be implemented until the 1990s by the Ministry of Culture at the urging of artists, most of them with an immigrant background.911 This demonstrates again that the freedom of choice goal of Prop.1975:26 is not Sweden’s multicultural bill contrary to the assumptions made by many authors and observers. Even so, it would not be chronologically the first policy given that Prop. 1974:28 as described above, already contained both provisions: state support to minorities’ cultures, and freedom of choice.

The freedom of expression goal of Prop. 1974.28 is described in almost identical terms as the freedom of choice goal of Prop. 1975:26. In the former it is stated that: Cultural freedom is something more than just freedom of expression. It consists for example in guaranteeing the freedom of citizens to choose between different cultural activities including the right to choose between a cultural activity and a non-cultural one. Even decentralisation which consists in giving to local councils more responsibility in cultural management was seen as a means of stimulating freedom and freedom of choice.

In the latter, freedom of choice entails that minorities be given the possibility to choose themselves “själv välja” to what extent they want to preserve and develop their cultural and linguistic identities.912 The difference is that in the cultural policy for the general society, ordinary citizens were given the right to choose between cultural activities in the mainstream culture. Regarding immigrants, they were given the right to choose between the mainstream culture and their own culture.

Rather, the way the concept was used, indicates that it had suffered from conceptual stretching. As revealed by Sartori, and described in this general introduction, conceptual stretching occurs when a concept loses its original meaning as it travels (it is applied to various

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situations). My investigation suggests that the term “freedom of choice” originated in the cultural sector. It was mentioned arguably for the first time in Sweden in 1963 by Harry Schein in his influential book “Har vi råd med kultur?” (Can We Afford Culture?)\(^{913}\) in which he suggested that cultural policy should be characterized by quality. In particular, he emphasized freedom of choice between viable alternatives and freedom from bad art which is obtained when an artist receives financial support but is immune to external pressure.\(^{914}\)

It probably crossed over from there to the field of integration during the debate on multiculturalism. In an article published in 1967 in the newspaper “Expressen”, Sven Alur Reinans exhorted the government to give to immigrants the means of both adopting the Swedish culture and retaining their own. However Reinans was an Assimilationist.\(^{915}\) He reportedly said that the three goals were:

invented by those (probably the main secretary) writing the proposition at the very last moment, and were not at all discussed, or even known by the others in the committee. But they sounded so well - you know, the French Revolution - so they were accepted in the final text.\(^{916}\)

In the same year, Thomas Hammarberg and Olle Wästberg used the term in the title of their article “Valfrihet åt invandrare!” (Freedom of choice to immigrants!) in which they argued that Sweden inevitably would become a country of immigration and immigrants’ cultures could enrich the society.\(^{917}\)

The word appeared for the first time in a government document in the Swedish Immigration Board’s feedback concerning SOU 1972:66. SIV then recommended that immigrants be given the means to choose between preserving their cultures and adopting the Swedish culture. During the plenary session debates of the cultural policy bill, Prop. 1974:28, the Conservative Mågard declared that cultural policy should be based on freedom and freedom of choice with the aim of creating a rich and diverse cultural life which makes enough room for personal initiative and invites every social group to take part in the cultural life.\(^{918}\)


\(^{914}\) SOU 1972: 66, p. 144.

\(^{915}\) He arrived in Sweden as a child refugee from neighbouring Estonia and stayed active in immigration issues and politics all his life. He was a parliamentarian for the Swedish Liberals, Folkpartiet. He died in 2010.

\(^{916}\) Email correspondence with Pr Ingegerd Municio-Larsson, Södertorn University College, June 2011. The main secretary was Kjell Öberg.

\(^{917}\) Hammarberg, Thomas and Wästberg, Olle (1967) “Valfrihet åt invandrare” *Expressen.*

\(^{918}\) Riksdagens Protokoll 1974. Nr 88, pp. 32- 34.
Tellingly, the Danish Minister of Cultural affairs, Niels Matthiassen used the same concept in his policy speech to the Folketing in 1977 in an assimilationist context.\textsuperscript{919}

IPOK, the Commission on Immigration which examined the three goals in 1984, concluded in its report: SOU 1984:58 “Invandrar- och minoritetspolitiken” (Immigrant and Minority Policy), that the freedom of choice goal was neither multiculturalism nor assimilation. The government rejected the Commission’s suggestion to define freedom of choice as immigrants’ own language and culture\textsuperscript{920} and later reneged on its own definition: the preservation of individuals’ identity and personal integrity as well giving them the means of enjoying and developing their cultural activities within the norms of the Swedish society.\textsuperscript{921}

Thus, the state’s support for freedom of choice in the circumstances described above does not constitute multiculturalism. Nor does state support for the adoption of Swedish culture, which is assimilation. Only active state support for immigrants’ cultures, the celebration of ethnocultural diversity, is multiculturalism as argued in Chapter One and stated in clear terms in Prop. 1974:28. Freedom of choice itself is only the freedom to choose of the artist or the citizen between alternatives as the review above has shown. The same concept is used in cross-cultural psychology to describe immigrants’ strategies of acculturation. As defined by John W. Berry, a leading cultural psychologist, immigrants are faced with three choices: joining the majority culture (assimilation), remaining entrenched in their community (segregation), or straddling both.\textsuperscript{922}

The truth tables below reproduce the process of birth of a multicultural policy in Sweden, and its abortion in Denmark.

\textsuperscript{921} Prop. 1985/86:98
Table 4: Configurational Comparative Method with theoretical typology: truth table (bis)

<table>
<thead>
<tr>
<th>Case</th>
<th>Problem Stream</th>
<th>Politics Stream</th>
<th>Policy Stream</th>
<th>Gatekeeper Stream</th>
<th>Party Majority</th>
<th>Party Discipline</th>
<th>Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dk</td>
<td>A₀</td>
<td>x</td>
<td>B₀</td>
<td>x</td>
<td>C₁</td>
<td>+ D₀</td>
<td>+ E₀</td>
</tr>
<tr>
<td>Swe</td>
<td>A₁</td>
<td>x</td>
<td>B₁</td>
<td>x</td>
<td>C₁</td>
<td>+ D₁</td>
<td>+ E₁</td>
</tr>
</tbody>
</table>

Table 5: Truth table of the origins of Danish and Swedish cultural integration policies, 1968-1974

<table>
<thead>
<tr>
<th>Agenda setting</th>
<th>Policy Choice and Formulation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Problem Stream</strong></td>
<td><strong>Politics Stream</strong></td>
</tr>
<tr>
<td>Sweden</td>
<td>Yes</td>
</tr>
<tr>
<td>Denmark</td>
<td>N/A</td>
</tr>
</tbody>
</table>

In Sweden, in contrast to Denmark, all the necessary conditions were met for multiculturalism’s time to come on the agenda setting. Firstly, the idea of multiculturalism was brought to the attention of the public and policymakers through long-running and confrontational debates in the media between 1964 and 1968, and between opponents and partisans of multiculturalism (problem stream). This was the consequence of two factors that were absent in Denmark: a large community of guest workers and a charismatic policy entrepreneur, David Schwarz.
Secondly, while similar changes took place in the political landscape of both countries in 1968 with, namely, the appointments of Olof Palme and Kristen Helveg Petersen as Ministers in charge of Culture (politics stream), and the giving way to cultural policy projects dealing with cultural norms and values, the two actors held different priors or ideational assumptions about multiculturalism. Olof Palme’s priors were positive. He saw multiculturalism as unavoidable, fair, a prerequisite to the well-being of immigrants and a source of strength for the country’s own cultural dynamism.

This engagement with the down-trodden stemmed from his formative experiences as a student during racial segregation in the USA, and travelling in the Third World. He did not conceive multiculturalism and did not just stand at the gate, but he used his authority to allow and foster a multicultural policy line against his own party’s position. His role was both that of an activist gatekeeper and a carrier. In Denmark, Kristen Helveg Petersen, despite adopting a pluralist definition of culture as in Sweden, held priors opposed to multiculturalism. These originated in a policy legacy: the party agreement on cultural policy reached between the Radical Liberal Party and the Social Democratic Party in the 1953 which promoted a nationalist culture. As a consequence, while White Paper 517 touted the benefits of international cultural exchanges, it deliberately omitted immigrants’ cultures.

In both cases, the structure of decision making was similar: a sequential alignment rather than a spatial arrangement although there was just one gatekeeper in Denmark, (the Minister) and many gates in Sweden: the Minister, the Prime Minister, the Parliament’s Standing Committee on Culture, and the Parliament in plenary; requiring as such party majority and party discipline in the parliament. Interestingly, party discipline among Social Democrats was a greater threat to the bill than party majority. While Social Democrats did not hold an absolute majority, they had—unlike other parties, notably right-wing parties—staunchly opposed multiculturalism before.

However, because the bill was promoted by Olof Palme, their sitting Prime Minister, Social Democrats were compelled to follow the new policy line. Ultimately, political parties differed only on the strength of the measure. While the Communists wanted the government to give more teeth to the idea by adding concrete measures, the remaining parties advised to wait for the conclusions of the ongoing Enquiry on Integration. However, the Enquiry and the ensuing policy bill, Prop. 1975:26 failed to formulate such measures as is shown in the previous chapter.

From theoretical and epistemological viewpoints, the study contributes new insights. One observes that contrary to the perspectives given by both Kingdon and his critics, streams are not exclusively independent or interdependent but various combinations can lead to agenda
setting. As the case of Sweden illustrates, the problem stream was independent whereas the politics (contingency) and the solution streams were interdependent. Then the controversy which appeared over the freedom of choice goal was a case of concept stretching. The concept was transposed from general cultural policy to integration policy and then assigned a new meaning. While this strengthens the thesis that Swedish multicultural policy is anchored in Prop. 1974:28, it is misleading as to the real meaning of multiculturalism: state support for immigrants’ culture for the benefits it brings to them and to the country rather than immigrants’ own strategies of acculturation.
Chapter 6: Toleration in Denmark and the Celebration of Difference in Sweden, Late 1960s-2006

Although, as mentioned in the literature review, most students of Danish cultural integration policy today agree that this policy is “assimilationist”, it was not until after 2000 that such a consensus appeared. Moreover, there has been a persistent controversy over the nature of this assimilation. On the other hand, Sweden, as shown in the previous chapter, despite an early consensus on its multicultural policy orientation, has been beset with controversy and doubts about where this multiculturalism lies, and thus its nature. We have seen that these situations are partly due to the fact that assimilation and multiculturalism as concepts are often fuzzy and become “stretched” as they travel. This chapter uses the two concepts as articulated in Chapter One and shows that, in essence, Danish assimilation amounts to toleration and Swedish multiculturalism can be equated to the celebration of difference.

Toleration is conceived as putting up with, or accepting, what is disapproved.\textsuperscript{923} It means, first, that toleration is not necessarily neutral toward different conceptions of what constitutes a good life, but has a marked preference for the majority culture. A marker of toleration is that the one who exercises toleration is more powerful than the one who is tolerated, but any form of constraint would be intolerance.\textsuperscript{924} If the state puts up with and refuses to exercise constraint, it is not because it does not have the means to do so but because it wants to use rational argument to persuade immigrants to give up some of their cultural practices and beliefs.

Second, only a subtle pressure is put on minorities to adopt the dominant culture. If immigrants do not want to adopt the majority culture, they are allowed to practise their culture in the private sphere. It is the “strategy of privatization.”\textsuperscript{925} However, they are requested to accept the lifestyles of the majority group and renounce any practice or belief which the majority culture rejects. As in the 17\textsuperscript{th} century, toleration helps to maintain social cohesion and peace which may be undermined if minorities were not allowed to practise their cultures.

\textsuperscript{923} Galeotti, Anna, E. (2002) Toleration as Recognition, p. 25.
The celebration of difference entails, on the one hand, recognition that immigrants’ well-being depends on the existence of a thriving cultural environment of their own, cultural embeddedness. The state, which is bound in its role to provide the good life to each citizen and person residing legally on its territory, must ensure that these immigrants enjoy their cultures. On the other hand, the celebration of difference imparts the view that ethnocultural diversity is beneficial also to the majority. While some aspects of immigrants’ cultures may not be acceptable and the state may require these immigrants to observe a “liberal minimum” based on the harm principle, the advantages brought by multiculturalism to the society are seen to outweigh disadvantages.

Toleration and the celebration of difference are conceived as middle range concepts or empirical universals as defined by Sartori. As explained in the introductory chapter, a middle range concept is neither as broad as a grand theory—which would seek to explain a phenomenon in all its aspects—nor as narrow as empirical observations. However, it dissects a phenomenon, “extracts” the most important aspects (defining characteristics) and leave out ancillary ones (accompanying characteristics).

In order to show how toleration and multiculturalism apply respectively to Danish and Swedish policies, and how they were maintained under the period of study, I will first conduct a content analysis of policies or aspects of policy documents which dealt with the concept of culture in the anthropological sense (social norms and values) as opposed to culture as aesthetics or symbolic culture (theatre, cinema, sculpture).


In conjunction, I use path dependence in order to show continuity in these policy orientations. Specifically, I use the historical analysis form of process tracing to establish patterns and sequences and to show that policy was maintained through negative feedback in

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Sweden and a reactive sequence in Denmark, as the figure below illustrates. After the short-lived period of multiculturalism under Jytte Hilden between 1993 and 1996, there was a strong reactive sequence aiming at consolidating Danish language and culture. In Sweden, Prop. 1996/1997:3 concluded in its evaluation of Prop. 1974:28 that it had barely been implemented and sought to remedy this situation. The Agenda for Multiculturalism of the years 2003-2006 was part of a renewed effort to implement this multiculturalism.

This chapter is divided according to the strength of movement of the countries’ policies rather than according to their contents, therefore these contents were divergent. There are three sections. The first section deals with the period of passive policies which stretches from the launch of these policies in 1968 to the mid-1990s. In Denmark, it was a period of “non-policy” stemming from the aversion of policymakers for ethnocultural pluralism. In Sweden, the primary policy idea was “cultural embeddedness” but this policy was not implemented.

The second section covers the period of consolidation from the mid-1990s to 2006. It shows how Danish policymakers reinforced the national culture and language after the failed attempt to introduce multiculturalism by Jytte Hilden, and how their Swedish counterparts redefined multiculturalism equating it to diversity; and as a source of benefit for the country’s cultural development; and as a means of tackling racism and xenophobia. The figure below illustrates the evolution of the countries’ respective cultural integration policies.

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Figure 9: Path dependence in Danish and Swedish Cultural Integration Policies

Several Possible Alternatives at t0  
- Multiculturalism
- Assimilation

Critical Juncture: Contingent events  
Select a path at t1-t2

Constraints keep Actors to Selected Paths at t2-ln through Negative Feedback.

- *End of labour immigration in Denmark (1973) and in Sweden (1972).
- *Appointment of new Ministers of Culture; Olof Palme in Sweden and Kristen Helveg Petersen in Denmark.
- *Launch of Enquiries on cultural policy - Adoption of a pluralist concept of culture (cultural democracy)

Toleration (DK)  
Celebration of difference (SWE)


6.1 Late 1960s-Early 1990s: Passive Cultural Integration Policies

The dominant theme in Swedish cultural integration policy between 1968 and 1993 was cultural embeddedness, or the obligation of the state to give to immigrants the opportunity to enjoy their culture as a necessary condition of their well-being. This policy line was embodied in Prop. 1974:28. Yet this policy was never implemented by the state. By contrast, Danish policymakers avoided any reference to immigrants’ cultures even as non-Nordic and non-Western immigrants became a sizeable demographic group, and they adopted the concept of “cultural pluralism” like their Swedish counterparts.

The Danes’ refusal marked their disapproval for ethnocultural diversity therefore, as Tomas Hammar pointed out, “non-policy [is] also a type of policy.”928 As discussed in Chapter Two, Peter Bachrach and Morton Baratz explain that politicians practise non-policy through indirect pressure, co-option, violence, and the promotion of opposite values. Steven

928 The emphasis is mine. Hammar, Tomas (1985) “Sweden”, p. 44.
Lukes indicates that politicians can also try to shape people’s preference through covert and subtle methods. However in the Danish case, no action was taken; the issue was simply ignored or taboo.

### 6.1.1 Non-Policy as Opposition to Ethnocultural Diversity in Denmark

Denmark’s White Paper 517 never gave way to the debate that its promoter, Kristen Helveg Petersen, had wanted. Nor did it become policy. Until 1993, while all successive Ministers of Culture adopted a pluralistic conception of culture that gave consideration to all social groups’ cultural expressions and values, they avoided any reference to immigrants’ cultures. Their policies only varied through their understanding and approach to the “non-ethnic” concept of cultural diversity.

Some, such as Niels Matthiasen and Oleg Vic Jensen, framed diversity as reaching to and incorporating the practices and beliefs of various socioeconomic groups. Matthiasen, a Social Democrat who became Minister from 1 October 1971 to 19 December 1973 and again from 13 February 1975 to 16 February 1980, cast himself as an agent of change. In his 1977 policy speech he narrated the story of Albert Einstein who was asked by his secretary why he had changed the answer to an exam question he had formulated the day before. He replied that the answer is not the same today (1977).  

Concretely, on the one hand, Matthiasen wanted state cultural policy to match population needs and expectations because of the increase in leisure time and tastes of the population, but also more aesthetic diversity in order to be attuned to the new trends and developments in the society (Ibid). The first dimension was reflected in the goals of freedom of expression, decentralization and quality (Ibid). The second dimension was embodied in the goal of cultural democracy that entailed that cultural policy reflects each individual’s general situation, and his or her relationship with other members of the society. According to Matthiasen, the culture of each sizeable group of the population should be given a platform of expression as well as the means of sustaining itself on par with other groups in the society.

Yet he maintained that this cultural democracy should be based on the behavioural patterns, practices and beliefs of the majority group: “The overall pattern of behavior [sic], habits and ideas [that] a group or society shares that determines behavior and attitudes of individual members of the group or society (Ibid).”  

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930 Ibid.
931 Ibid.
932 Ibid.
Matthiasen named regional folksong and youth groups. However, he failed to include immigrant groups despite the fact that most guest workers had been allowed to stay in the country after the end of labour migration and the arrival of many refugees from Vietnam and Chile (ibid).^933

Similarly, Ole Vig Jensen, a Radical Liberal who was Minister in charge of Culture from 3 June 1988 to 18 December 1990, declared in his 1989 policy speech that “to define cultural policy in a broad way is a Danish tradition.”^934 Citing the novelist Knud Hansen, he affirmed that culture is the way Danes see reality, what surrounds them, the way they build their houses, cook food, dress, tend their flower pots, etc. Then, he introduced a new agenda called the Cultural Policy Ideational Programme. This policy was meant to bridge the gap between the cultural establishment (museum, theatres, libraries, painters and composers) and folk culture which he described as the culture emanating from the local community and reproduced by this community over many generations. Like Matthiasen, Vig Jensen did not include immigrants among these groups.

Other Ministers of Culture equated cultural diversity to ethnocultural diversity but it was limited to international cultural cooperation and excluded immigrants’ cultures. Lise Østergaard, a Social Democrat, who was the Minister of Culture from 28 February 1980 to 10 September 1982, and who had the ambition of formulating a new cultural policy befiting the 1980s, asserted in her policy speech to the Folketing in 1981, that culture should be more than art, literature, photography, literature and music. It should also strengthen the population’s identity as Dane and Nordic and members of the world community. The latter, however, referred to international cooperation and development rather than the valorisation of immigrants’ cultures.

Mimi Stilling Jacobsen, a Christian Democrat, who led the Ministry of Culture between 10 September 1982 and 12 March 1986, affirmed in her policy report to the Parliament in 1984 that: “freedom of choice must ring everywhere. No one should determine what people should do, hear or see [...] Quality, diversity and freedom of choice are the key words of [her] cultural policy.” Her frame of reference was the recurrent debate on the concepts of a “finkultur”

^933 Ibid.
^935 Ibid.
(high culture) and “folkelig kultur” (popular culture) and “græsrodsbevægelser” (grassroots movements). She did not refer at any time to immigrants.

However, she devoted a section of her report to international cultural cooperation which she termed as a supplement to the national cultural life, citing agreements between the country and UNESCO, the European Council and the Nordic Cultural Treaty. Ethnocultural diversity was considered good as long as it was controlled and limited to exchanges across borders. No space would be allowed within the national borders for cultures so different as the ones of non-Western immigrants. Because of the highly personal nature of Danish cultural policy making and, as demonstrated in the previous chapter, the policy legacy of the Historic Compromise on Culture, none of the Ministers named above resorted to any of the strategies mentioned by Bachrach, Baratz and Lukes: co-option, violence, promotion of opposite values, covert pressure or psychological manipulation. There were no direct threats that warranted a reaction like globalization, the introduction of a multicultural policy and increased immigration from the late 1990s onwards. This reinforces the argument I made in the previous chapter that the negative priors held toward multiculturalism and embodied by a policy legacy, the Historic Compromise on Culture of 1953, had become norms or expected behaviours.

6.1.2. Immigrants’ Cultural Embeddedness and Implementation Inertia in Sweden

Sweden’s founding cultural policy, Prop.1974:28 was expected to guide policy actions over the next two decades. They chose to investigate each cultural policy domain and then specify a course of action. Nevertheless, their conception of culture was pluralistic as demonstrated in the previous chapter. Except for its provisions for immigrants’ cultures, the overarching goals of Prop. 1974:28 were similar to Danish assimilationist policies: freedom of expression, equal access to cultural goods, independence of artists from commercialism, preservation of cultural heritage and promotion of international cultural exchanges.

However, as opposed to their Danish counterparts, who until 1993 avoided dealing with immigrants’ culture and thereafter practised toleration, Swedish policymakers encouraged multiculturalism: the celebration of difference. From the passage of Prop.1974:28 in 1974 to the mid-1990s, a period during which immigration was not a burning issue, the main policy line stated that immigrants’ well-being is tied to the existence of a thriving cultural community of their own: cultural embeddedness.

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938 Ibid.
939 Ibid.
As mentioned in the previous chapter, the government report SOU 1972: 66, which laid the ground for Prop. 1974:28, claimed that the situation of immigrants was distressing.\footnote{SOU 1972:66, p. 293.} As such, the Bill proposed in two sections called “Insatser för eftersatta grupper” (Measures for disadvantaged groups), and “Gemenskap och aktivitet” (Community and Activity). This was a set of solutions which, he report said, was drawn from the experiences of immigrants and other disadvantaged groups such as the mentally impaired, people suffering for disability and those living in rural areas.\footnote{Ibid., p. 299.} The Bill proposed the “systematic” monitoring of the cultural situation of immigrants\footnote{Ibid, pp. 299-300.} and stated that any future policy, as a priority, should provide immigrants and for that matter, other disadvantaged groups, the means of carrying out their own cultural activities. Practically, this meant providing financial support to cultural associations which, in light of their close links to, and wealth of experience with, immigrants, were considered the most effective channel or mechanism of implementation.\footnote{Ibid., p. 300.} In the mean-time, state institutions were advised to give to these associations as much autonomy as possible in the management of their affairs.\footnote{Ibid.}

However, the implementation of this policy proved more difficult and led to stagnation. The provisions which had been made for aesthetic culture did not materialize. As Tor Larsson writes:

> The innovations contained in the 1974 decision on cultural policy - the proposal to broaden the scope of cultural policy support to include professional activities outside the area of established cultural activities, and in various ways to stimulate amateur culture and the development of popular public cultural institutions and events that appeal to a broad public [gave] way to a traditional art policy.\footnote{Larsson, Tor (2003) “Cultural Policy in Sweden”, p. 208.}

While as we have seen in the previous chapter, Danish policymakers’ avoided multiculturalism because of their negative priors, the failure of their Swedish counterparts to implement their policies lies principally in the deteriorating economic situation at that time or, in theoretical terms, the accumulative function of the state. Following the 1973 oil crisis, the government imposed severe cuts on the cultural policy budget and in other government sectors.\footnote{Ibid.}
The burden of policy implementation fell almost entirely on local councils. “With the exception of a few especially successful years at the end of the 1970s” Larsson writes, “the state [showed] weaker growth than the local councils as regards appropriations to culture.”

One owes mostly to local councils and regions the little realizations one can point at during those years, like the funding of immigrant newspapers and cultural activities through the channels of ethnic associations. In the 1980s, the Bill was criticised for being ineffective.

When one looks at this failure through a theoretical lens, it appears that it was primarily a consequence of the state willing to accomplish its regalian functions—namely accumulation as described by Christina Boswell. The Swedish government sought above all to “save money”. However, Charles Lipsky’s perspective, which ascribes implementation failure respectively to the influence of street-level bureaucrats and the absence of implementation details in the planning phase, is also demonstrated.

As shown in the previous chapter, the back-and-forth, between the two commissions involved in the drafting of Prop. 1974:28 and Prop. 1975:26 over the funding of immigrants’ cultural activities, yielded no concrete measure. On the one hand, no parliamentarians, except the Communists, agreed to incorporate detailed financial measures in favour of immigrants in Prop. 1974:28. On the other hand, the parliamentarians involved in Prop. 1975:26 did not examine that issue. In these conditions, even without the economic crisis, one could hardly expect the implementation of the multicultural provisions to be successful.

6.2 Early 1990s-2006: “Taking the Bull by the Horns”

In the early 1990s Sweden was again in the throes of a bad economic crisis and the first cultural policy bill, Prop. 1974:28, at the end of its second decade, had to be evaluated as per the country’s policy making habitus. In 1992, “Kultursutskottet”, the Riksdag’s Standing Committee on Culture, took the initiative of formulating a second cultural policy. In 1993, the Parliament set up a commission of enquiry with that aim, “Kulturutredningen” (The Enquiry on Culture). However, since the mid-1980s the rapid growth in the number of asylum
seekers had not only increased the rate of xenophobia but issued in a debate over the compatibility of non-Western immigrants’ cultures with the Danish and Swedish cultures in particular, and Western cultures in general. This anxiety was perhaps summed up best by Queen Margrethe II of Denmark who, in her New Year’s message in 1985, wrote:

On the one hand, we are proud that refugees choose to come to our little paradise; but when we see them getting confused over our way of living and our language, then feelings of hospitality are forgotten all too quickly, and disappointment sets in both sides.

For the first time, like their Swedish peers, Danish policymakers dealt directly with ethnocultural diversity by formulating a cultural policy. While in Sweden the multiculturalist orientation was continued without any rupture, surprisingly in Denmark a multicultural policy provision was introduced by Jytte Hilden. However, it generated a backlash or a reactive sequence. It was not implemented and was followed by a policy of toleration.

6.2.1 Denmark and the Politics of Toleration

A) 1993-1996: Jytte Hilden’s Failed Multicultural Episode:

The “Old Sisters’ Club,” Ideas and Policy Learning

Jytte Hilden was appointed as Minister of Culture on 25 January 1993 by Poul Nyrup Rasmussen, a fellow Social Democrat, as part of his first centre-left government coalition. She wanted to reiterate the role played by culture in the society. As she asserted:

Culture must be part of the debate and the solution. I stressed the connection between cultural policy, social policy and education policy... It was really my wish to point out directions where we have not been... Get money, get debate in the parliament.

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952 See Introduction chapter for more details.
955 She remained as Minister of Culture in Nyrup Rasmussen’s second coalition government and was appointed as Minister in charge of Scientific Research in Rasmussen’s third government.
956 Personal interview with Jytte Hilden, 23 September 2009, Copenhagen.
Hilden created a think tank within the Ministry called “krystaluglen” (The Crystal Ball) composed partly of friends and led a fact-finding mission around Europe. The trip was intended to learn from other countries and establish links with other policymakers within Scandinavia and Europe. According to her, it targeted “small countries with big minorities like Denmark”. These were Sweden, Norway, and Hungary which hosts a sizeable Gypsy community, but not Germany and England. However, during the course of the trip, she became more acquainted with Åse Kleveland, the Norwegian Minister in charge of Culture, and Margot Wallström, her Swedish counterpart. These latter two also knew each other. Hilden affirmed that she mostly found encouragement and inspiration in her Scandinavian peers. Despite their similar portfolios and political affiliation, they bonded first of all as women for whom the promotion of equality is a central tenet of their idea-frames. The introduction of multiculturalism, according to her, was meant to catch the spirit of the time, “equality”.

Kleveland was born in Stockholm to a Norwegian father and a Swedish mother. She was appointed Norway’s Minister of Culture, Media and Sport from 1990 to 1996 in the government of Gro Harlem Brundtland and from 1999 to 2006 served as Director of the Swedish Film Institute. Today, she is chairperson of the Norwegian Humanist Association, one of the country’s largest human rights organizations. Wallström was Sweden’s Minister of Culture from 1994 to 1996, the period of the relaunching of the country’s multicultural policy. She served as the first Vice-President of the European Commission but also as chair of the Council of Women World Leaders’ Ministerial Initiative, a forum for female Heads of State and Ministers and, since February 2010, as the UN’s Special Representative on Sexual Violence in Conflict.

Hilden made a name for herself as a staunch feminist as early as 1975 with the publication of her book Du spiller en rolle - også en kønsrolle (You play a role – a gender role too). She pioneered numerous initiatives in favour of women among which the Nina Bang Prize in honour of the 75th anniversary of the appointment of the first Danish female minister, and founded the Simone Club named after Simone de Beauvoir within the Kvindeligt Selskab (Women’s Society) in 1999. She also authored a bibliographical book of female ministers in Denmark, 37 Quindeministre på rad og række (37 Female Ministers in Successive Order).

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958 Ibid. See also Danish Ministry of Culture (1996) Politics of Culture in Denmark- A Presentation, p. 10.
959 Ibid.
960 Ibid.
She initiated a programme of radical change which was intended to review the country’s cultural policy from 1961 when the Ministry of Cultural Affairs was created, and renew it. She set up a working commission to that effect. This was the first time an enquiry of that size had been launched since White Paper 517 in 1969. Hilden explained this decision using two factors: Firstly, was the context at the time. “Generally speaking” she declared, “politics took a turn at that time. It was a general approach that new things were set on the agenda.” Secondly, were her personal frames:

Denmark is a multicultural country. Everybody can be part of it. We need to show the difference and learn from each other and also have respect for other people. Culture is broad and is for everybody... Young people, women, people outside of Copenhagen, immigrants.

While, she held priors which were favourable to multiculturalism based on her personal experience, after her fact-finding tour, these priors became actions. Hilden created a working commission within the confines of the Nordic Cultural Council, the pan-Nordic institution of cultural cooperation. She chose the Nordic Council instead of the Ministry of Culture, as one would have normally expected, to stave off the opposition and the rebellion of the Ministry’s bureaucracy. While this move was justified as a progressive step toward the achievement of the noble aim of a Nordic and even European cultural policy, it was in reality a case of policy “shifting”.

Specifically, policy was, in the words of Virginie Guiraudon, “shifted upwards and outwards” as a strategy for Hilden to overcome the opposition of the Ministry’s bureaucracy to her policy ideas. “You don’t want to get trouble in the Ministry”, she disclosed. The Nordic Cultural Policy was a safer institutional arena where she could “shift upwards” her project and shield it from the rebellious and conservative Ministry’s bureaucracy. Consequently, the project was also shifted outwards in the sense that all the members of the

962 However, unlike White Paper 517, the enquiry was made of experts, not bureaucrats, allegedly in order to maintain its independence.
963 Personal interview with Jytte Hilden, 23 September 2009, Copenhagen.
964 Danish Ministry of Culture (1996) Politics of Culture in Denmark- A Presentation , p. 27.
965 Guiraudon states that when governments face stiff opposition to restrictions on immigration, they shift “decision-making - upwards to inter-governmental international forums and downwards to local authorities- as well as outwards by delegating the implementation of policy to private actors.” At the intergovernmental level, these are agreements such as Schengen and Frontex, and working groups situated within the confines of the Justice and Home Affair pillar. The shifting of policy outwards is more a matter of government control of flows and policy implementation. It entails putting the onus on airline companies to ensure that passengers coming into the country are in possession of proper documentation, privatizing the management of detention centers. See Guiraudon, Virginie (1998) “Citizenship Rights for Non-Citizens: France, Germany and the Netherlands” in Joppke, Christian (ed.) Challenge to the Nation-State. Immigration in Western Europe and the United States, Oxford: Oxford University Press, pp. 298-302.
966 Personal interview with Jytte Hilden, 23 September 2009, Copenhagen.
Commission were outside experts. This was an unusual occurrence. No national cultural policy until then had been drafted outside a national institutional framework.

The Danish taskforce which drafted White Paper 517 in 1969 and even the Swedish New Cultural Council of 1968 and Enquiry on Culture of 1993 were all a mix of bureaucrats, experts and politicians, and operated within national institutions. As expected, the appointed head of the commission, the cultural sociologist, Peter Duelund, was a friend of Hilden. “It depends who you put in the committees” Hilden stated, “I have a personal connection with him. I have known him since the 1970s.” According to Duelund himself, he “was the architect, Jytte Hilden was implementing [the policy].”

As expected the outcome of the Commission’s work, an imposing 17-volume collection, “The Politics of Culture” published in 1996, bore a striking resemblance to Sweden’s first National Cultural Policy (Prop. 1974:28), and—to a lesser extent— the Danish White Paper 517. Like the Swedish policy bill, it reviewed each sector of the arts since 1961 and proposed policy solutions. Each review was carried out by one or many authors. However, with each volume running to over 300 pages long on average, the Swedish policy bill and the White Paper looked diminutive in comparison.

In Volume 16 of “The Multicultural Denmark” in which the journalist, Olle Hammer, and cultural sociologist, Charlotte Toft, dealt with culture in the anthropological sense, these authors suggested policy ideas and measures for state institutions to implement in favour of immigrants. However, they were not impervious to the growing scepticism about multiculturalism at that time throughout Europe, and the fact that Denmark was a particularly hostile territory. They were therefore cautious. They acknowledged first that: “the discussion of the multicultural society is often a vehement one, strongly affected by emotions, and there exists no sort of agreement among Denmark’s population concerning the goal or the means.”

Then they conjectured that:

Since the mid-1970s, Danish immigrant and refugee policy has focused on the integration of the ethnic minorities in Danish society. Here, again, we find a passionate exchange of views. Should these efforts toward integration result in “assimilation”, which entails the ethnic minorities’ uniform adaptation to Danish society? Or should we pursue a pluralistic integration, which requires reciprocal adaptation among Danes and the ethnic minorities, with respect for their culturally specific features? How do we avoid the isolation of the

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967 Ibid.
968 Personal interview with Peter Duelund, 24 September 2009, Copenhagen. See also Danish Ministry of Culture (1996) Politics of Culture in Denmark- A Presentation, p. 3.
969 Books are numbered from 1 to 18, However, book no 17 was not published.
970 Danish Ministry of Culture (1996) Politics of Culture in Denmark- A Presentation, p. 3
minorities, with the creation of ghettos and the rise in ignorance and accompanying prejudice? The debate on the multicultural society continues both in Denmark and in the other European societies. Rapid developments leave no time for hesitation. We must think now, and we must act now!971

Finally, they designated the path ahead:

A multicultural Denmark is the objective! A Denmark where one thinks multicultural, makes multicultural decisions and organizes multicultural and acts in accord with this goal.972

Duelund chose Olle Hammer and Charlotte Toft owing to ideational affinity.973 Among mainstream Danish intellectuals, Hammer, the lead-author, was perhaps the most well-disposed to multiculturalism. He had chronicled the immigrant experience since 1976 and edited a handbook on immigrants and refugees in Denmark which was published the year before the Multicultural Denmark. Most contributors to the handbook were of immigrant background themselves—namely Tamil, Turkish and Vietnamese—and described their groups’ experiences in a favourable light.974 In 2002, he became the co-author of a much discussed enquiry on the political participation of immigrants, Etniske Minoriteters Indflydelseskanaler, which concluded that their influence on the political process was marginal.975

Like Kristen Helveg Petersen in 1968, Jytte Hilden wanted “her” report to have a resounding effect in the public opinion. She wrote with emphasis:

You have now in hand a presentation of Politics of Culture in Denmark, the most comprehensive work on Danish cultural policy in the last 27 years... It is my hope that the foregoing presentation will spread rings in the international cultural universe and especially arouse the desire to read and debate in all corners of the world.976

Yet, it was rejected if not ignored. She blamed the conservatism of her own party.977 Indeed, Hilden’s decision to introduce multiculturalism was an act of faith. Since the controversy over the Alien Act of 1983, which had seen the country pass one of the most generous refugees’ laws in the West only to rescind it in 1985 and 1986, opposition to immigration and multiculturalism in the country had only sharpened.

971 Ibid.
973 One should not confuse ideological and ideational affinity as within the ranks of the Danish Social Democratic party, there was a growing division on the multicultural issue.
976 Danish Ministry of Culture (1996) Politics of Culture in Denmark-A presentation, Copenhagen, p. 3.
977 Email correspondence with Jytte Hilden, Danish Minister of Culture 1993-1996, 20 July 2011.
In the public opinion, while “in 1985, 23 percent of voters agreed with the statement ‘immigration is a serious threat against our distinctive national character’. By 1987 the percentage had doubled to 47 percent.”\textsuperscript{978} The arrival of about 20,000, mainly Muslim, Bosnian refugees at the beginning of the 1990s created further tension as illustrated by the demonization of immigrants in the media, and the so-called “mayors’ rebellion” which involved the unilateral decision by a number of mayors to not “deal with any more aliens in their local councils”.\textsuperscript{979} As Jens Rydgren writes:

The Social Democratic Party, for their part, became increasingly divided over the issue of immigration during the 1990s. Originally a defender of refugee immigration and (some sort of) multiculturalism, the party drifted toward a more unsympathetic view of these matters as the Danish People’s Party gained ground in opinion polls.\textsuperscript{980}

One of the most vocal leaders of this opposition was Karen Jespersen, the iron-fisted Minister for Social Affairs (25 January 1993 - 28 January 1994, then 27 September 1994 - 23 February 2000) and Internal Affairs (23 February 2000 - 20 November 2001). As Dorte Skot-Hansen reports, Jespersen claimed during an interview that:

she does not want to live in a multicultural society where the cultures are equal. Soon afterwards, the Minister of Internal Affairs established a think tank that... issued a report declaring Danish attitudes and values which foreigners should respect and adhere to if they seek to integrate into Danish society.\textsuperscript{981}

Lastly, although Hilden increased funding for artists, many of her policies rendered her unpopular among them. Many journalists were asking for her head and speculating if the Prime Minister, Poul Nyrup Rasmussen, had enough courage to sack his “political sister-in-law”. Hilden was then the wife of Mogens Lykketoft, the powerful Minister of Finance and a close ally. The couple was seen as “a package, take it or leave it”.\textsuperscript{982}

Eventually, in 1996 Poul Nyrup Rasmussen gave in. In his third government reshuffle, he replaced her with the Radical Liberal Ebbe Lundgaard, the only new minister and shifted Hilden to the Ministry of Scientific Research. The cultural journalist and keen observer of Danish cultural policy, Kristen “Bjørk” Bjørnkjær, summarizes Hilden’s tenure as follows:

\begin{flushright}
\textsuperscript{979} Jensen, Bent (2001) \textit{Foreigners in the Danish Newspaper Debate from the 1870s to the 1990s}, p. 81.  
\textsuperscript{980} Ibid., p. 64.  
\end{flushright}
If we were to remember something from her time as Minister for Culture, it would be her diligence and her sense of innovation. She challenged the predominant culture and rebelled against conventional thinking. However, most of her policies died at the end of her term. The problem was that too many times, these were headless and not nearly as thoughtful as you might desire. Despite appropriating a lot of money for culture, she was not popular, either with voters or in culture. As a minister you can live with being unpopular with one party, not with both.983

Hilden stated in response that these claims emanated from “middle-aged men from the centre of Copenhagen” not from marginalized voices. She said that:

[she] took power from “the usual suspect” and gave it to other people. Women from outside the capital. That was new and that gave debate. The “krystalkugle” was composed of young people from all over the cultural sector, I wanted to have other opinions around me, Peter Duelund is a very skilled researcher. I had a very good relationship with him, but my role, my job was to find majority in parliament for my proposals, it is two very different jobs. The discussions about multicultural issues are very important but as a Minister of Culture, you got to have support from all other parts in the political landscape. That was difficult in my time in parliament.984

Although this multicultural episode was short-lived, it is particularly illuminating on a theoretical plane. Firstly, it demonstrates once more the “stickiness” of Denmark’s inward-looking cultural policy. There is a strong similarity between Hilden’s fate and the fall in grace of Julius Bomholt, the country’s first Minister of Culture, and the rejection of his Workers’ Culture in the 1930s. As already mentioned in Chapter Three, Bomholt was compelled after a cross-party agreement which issued in a more nationalist-oriented cultural policy, to renege on his own works.985 Hilden and Bomholt tried to graft a policy which was “alien” to the country’s cultural landscape and failed utterly.

Like Bomholt,986 Hilden and her chief architect, Peter Duelund, were disaffected on the personal level by their policy failure and subsequently joined the mainstream political current. During interviews neither Hilden nor Duelund spoke enthusiastically about the policy’s multicultural provisions. They even seemed to disown it. Hilden said laconically: “you know... the policy was not implemented.” Meanwhile she was eager to highlight her role in the creation

983 Ibid.
984 Email Correspondence with Jytte Hilden, 20 July 2011.
985 See previous chapter for more details.
986 Bomholt’s appointment as speaker of the Folketing was seen as an exit door.
of *Den Sorte Diamant* (The Black Diamond), the imposing diamond-shaped royal library in Copenhagen. As for Duelund, he was demure.987

Secondly, this episode highlights the circumstances and conditions under which an activist gatekeeper can successfully perform his or her role. This is most evident when one compares the respective agencies of Olof Palme and Jytte Hilden. The two actors were similar in many respects. They were both born into the upper-class layer of society. They had a strong engagement with equality, the Third World, and multiculturalism, and faced a hostile environment and divisions in the ranks of their party. However, while Palme succeeded, Hilden failed. As argued by Berman, the chance of an idea being adopted and becoming a norm increases with the influence of the carrier.988 In particular if—as asserted by Skocpol and Weir—the system is not receptive to the idea989 or—as claimed by Peter A. Hall—the idea does not match with politicians’ and political parties’ interests990

Indeed, Jytte Hilden wielded influence but not as Palme did, and only just as much to be able to stay in the government after her departure from the Minister of Culture. There was a gatekeeper above her, the Prime Minister, Poul Nyrup Rasmussen, whose decision was motivated by political interests. In contrast to Hilden, Palme—as shown in Chapter Five—became Prime Minister and acquired more power and authority which he successfully used to drive his agenda and convert fellow Social Democrats to his view on multiculturalism. It is unlikely that Palme’s agency would have been as successful if he had not been able to wield such great influence.

**B) 1996-2001: The Radical Liberals’ Form of Toleration: Mutual Toleration**

The two following Ministers of Culture, the Radical Liberals, Ebbe Lundgaard and Elsebeth Gerner Nielsen, reverted to assimilation, or more precisely to toleration despite being members of the same centre-left government coalition. As Bjørnkjær notes about Lundgaard’s term, “it was a period of coolness after the most turbulent period in Danish cultural policy history since the Rindalist movement of the mid-1960s and Lundgaard’s policy statement was a “Danish-Danish identity thing”.991 Lundgaard chose the policy speech mode of policy

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making and, in his statement to the parliament on 4 November 1997, underscored the pre-eminence and the importance of Danish culture.\footnote{992} 

He introduced three constitutive elements of the national culture: the Danish language, “bevidsthed og virketrang” or the respect for the expression of the Danish people’s soul and wills, and the respect for other people and their expressions.\footnote{993} The two first elements embodied the national culture while the respect for other people and their cultures fell within the area of “international cooperation.” Like Lise Østergaard’s and Mimi Stilling Jacobsen’s policy ideas in the 1980s, this diversity was restricted to international cultural exchanges and did not extend to resident foreign populations.

He identified two main mechanisms of implementation. The first was the promotion of the Danish language. He argued that it ought to become a policy goal because language marks the boundary between one culture and another. As the world shrinks due to globalisation and frontiers become blurred, one needed a cultural starting point “kulturelt udgangspunkt”, a yardstick - the Danish culture - against which other cultural currents could be gauged.\footnote{994} For this reason, Danes should not feel culturally inferior compared to other cultures. Danish cultural policy needed to provide to New Danes (immigrants and refugees) the opportunity to learn Danish language and the basic tenets of the country’s culture toward which immigrants in return must demonstrate goodwill.\footnote{995} This dimension of Lundgaard’s policy underscored the first aspect of the policy of cultural toleration, namely the prominence given to the national culture in the public sphere.

Elsebeth Gerner Nielsen, who replaced Lundgaard in March 1998, did not formulate a policy statement.\footnote{996} Peter Duelund combined her policies ideas together. Duelund asserts that:

Elsebeth Gerner Nielsen (1999) based cultural policy on Ole Vig Jensen’s broad anthropological concept from 1989... Gerner’s anthropological bridge building aimed to improve social integration in Danish society by revitalising the sense of “Danishness.” Cultural policy became a matter of protecting the Danish language and identity. The argument was that national culture had been caught off guard by the rapid speed of global change and the multicultural challenge posed by migration from other cultures. As a result the large national cultural institutions were to be strengthened.\footnote{997}

\begin{footnotes}
\footnotetext[993]{Ibid., p. 1.}
\footnotetext[994]{Ibid., p. 4.}
\footnotetext[995]{Ibid.}
\footnotetext[996]{Elsebeth Gerner Nielsen declined to give an interview in the course of this research project.}
\footnotetext[997]{Duelund, Peter (2003) (ed.) \textit{“Cultural Policy in Denmark”}, p. 54.}
\end{footnotes}
However, unlike Lundgaard whose tenure in office lasted only a year and saw little realisations, Nielsen was able to implement some of her policy ideas. In June 2000, she held a conference on Danish language whose purpose was to collect as many views as possible on the formulation of a Danish language policy. Following the conference, a policy proposal was put forth entitled “Det danske sprog skal styrkes - ikke værnes” (The Danish language must be strengthened - not defended). It promoted Danish cultural production as a means of support for Danish language and advocated the increased use of Danish in education, academia, business, the IT sector, international contexts and the public service.

Then as part of an action plan she initiated for the years 2001-2004, DR (Danish radio), the state radio and TV 2, the main public television station, agreed to put in place specific measures in favour of the Danish culture and language. These agreements were later included in an amendment of the Law on Radio and Television Broadcasting. Finally, she launched the project “Herfra min verden går. Dansk identitet i fortid, nutid og fremtid” (From Here My World Starts: Danish Identity Yesterday, Today and Tomorrow) for which DKK 7.5 million (NZD 1.8 million) were allocated. From November 2000, 40 activities of various natures (e.g. exhibitions, presentation, and round-table discussions) were launched within the framework of the project, with the aim of creating a public discussion on how Danish identity and values are expressed in towns and villages.

Despite their preference for predominance of the national culture, the two Danish Radical Liberal Ministers did not coerce immigrants into adopting the majority culture. They did not interfere in immigrants’ cultures. They asked them to keep them in the private sphere (privatize) except in two situations: when some aspects of these cultures seemed unacceptable (the liberal minimum) and when they threaten the ways of the majority and its lifestyles (the harm principle). The liberal minimum is involved for example in cases such as FGM and forced marriages, and the harm principle is illustrated by the Cartoon Controversy which pitted accusations of religious blasphemy levied by Muslim leaders against claims of preservation of the freedom of expression.

Their approach toward immigrants’ cultures was, however, marked by public respect. They held the view that immigrants’ cultures can co-exist in the public sphere with the majority culture - not side-by-side - but in its shadow. This was symbolic but enough to provide immigrants with a sense of self-respect and standing. Ebbe Lundgaard declared that

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998 Ebbe Lundgaard passed away in 2009 after a year-long fight against cancer. He could not be interviewed.
1000 Ibid.
cultural policy must ensure that immigrants and refugees are provided with the means of enjoying their cultures, albeit in the form that invites other Danes to a better knowledge of them.\textsuperscript{1001} Thus arose the concept of mutual toleration.

For Elsebeth Gerner Nielsen, as Duelund notes, “The point, however, was not to return Danish culture to either Grundtvig or other multicultural forms. ‘Danish culture has to be a mixed bouquet, but a bouquet needs a vase or it falls apart.’”\textsuperscript{1002} Like in the allegory of the salad bowl, Danish culture would be the bowl and other cultures, the ingredients which float more or less freely within it.

To highlight her commitment also to give a place to immigrants’ cultures, Nielsen organized the Conference “1+1= 3” from 5 to 7 October 2001 “\textit{Kulturel mangfoldighed och kulturlivets udvikling}” (Cultural Diversity and Cultural Life Development) which was intended to discuss strategies and action plans on diversity. In her speech at the Conference, she stated that:

The question of how we learn to live with cultural diversity is becoming more and more important each passing day. When it comes to creating a dialogue between cultures, we are hopelessly behind in Denmark. We will have to get accustomed to the fact that Denmark is moving toward a multicultural society and urgently find out how we can build new bridges between “them” and “us.”\textsuperscript{1003}

On one occasion, she stirred controversy by donning a headscarf to show her support for the freedom of expression of immigrant women in opposition to the stance of Søren Krarup who had equated the headscarf to a Nazi insignia.\textsuperscript{1004} Not surprisingly, this dimension of their policy was the most difficult to implement for Radical Liberals. As an example, despite Gerner Nielsen’s exhortations, many officials of the Ministry of Culture and other public cultural institutions boycotted the “1+1= 3” Conference.\textsuperscript{1005}

She set up the Cultural Development Fund, \textit{Kulturministeriets Udviklingsfond}, within the Ministry with the aim of supporting amateur and ethnic artists and thus promoting immigrants’ artistic expressions. Yet this aim was only limited to the arts and did not include

\begin{flushright}
\textsuperscript{1004} This controversy occurred outside the period of study of this research but illustrates well Gerner Nielsen’s attitude. See DR Forside (2007) “Khader og Gerner undgår konfrontation”, available at http://www.dr.dk/Nyheder/Politik/2007/05/02/112804.htm, last accessed 4 June 2011.
\end{flushright}
cultural practices and values. However, it was also hardly implemented. As Dorte Skot-Hansen writes:

Only 10% of the fund’s subsidies were actually awarded to the ethnic and cross-cultural sector in 1998-1999, equivalent to about 0.05 % of the Ministry of culture total budget. In 2000 20% of the subsidies went to the ethnic and cross-cultural sector. But still, the Board acknowledges that it has been difficult to identify projects with a sufficiently high-level of quality in this area.\footnote{Skot-Hansen, Dorte (2002) “Danish Cultural Policy - from Monoculture toward Cultural Diversity”, p. 203.}

The Board’s members, all ethnic Danes, alleged in the majority of cases that artistic products authored by immigrants did not meet the high criteria of quality expected. Yet they admitted that they did not have adequate knowledge of immigrants’ cultures and were unsure if their yardstick was universally applicable. These policy practices, more likely, were a way of curtailing this initiative. As mentioned by Jytte Hilden in her interview, and as Hansen-Skot reiterates, “In fact, both the Ministry of Culture and the cultural institutions have been characterised by a degree of inertia from which it has proven difficult to escape.”\footnote{Ibid., p. 199.}

C) The Conservative’s Form of Toleration: Minimal Toleration

Following the VKO victory in the November 2001 general election, the new Prime Minister, Anders Fogh Rasmussen, replaced Gerner Nielsen with Brian Mikkelsen, his fellow Conservative. As with his predecessors, Mikkelsen advocated the “defence of the Danish language” against the English language “invasion” and the preservation of the Danish culture. However, like the new right-wing government’s socioeconomic integration policy, he wanted to give more teeth to the country’s assimilation policy. He criticized previous ministers for having paid lip-service to their policy intentions.\footnote{Interview with Rasmus Nygaard, Integration Consultant, Integrationsservice, Danish Ministry of Refugee, Immigration and Integration Affairs, Copenhagen, 26 November 2009.}

Thus the same year, he set up a ministerial working committee with representatives from the Ministries of Education, Scientific Research, Education, and the High Council for literature, for the purpose of formulating a new Danish language policy. The committee was presided over by Pr Jørn Lund, the director of Det Danske Sprog- og Litteraturselskab, DSL (Society for Danish Language and Literature), and member of the Danish Academy. Lund has been something of a crusader for the Danish language and succeeded Iver Kjær, the great Danish philologist, at the head of the DSL.\footnote{Interview with Henrik Laurentzen, 27 November 2009. Laurentzen replaced Jørn Lund who became unavailable for the interview.} The committee handed back its report “Sprog
The report served as blueprint for the Ordinance on Language Policy “Sprogpolitisk redegørelse” which was issued on 13 September of the same year.

In an opinion piece written in Politiken, a centre-left leaning newspaper on that day, Lund made an impassioned defence of the Danish language and the project:

Let us abolish Danish! The journalist Oliver Clausen wrote in the summer of 1974 in an article in Politiken. He had left his native country, replacing his Danish first name Ole by Oliver and considered in the light of his international experience that the best thing would be to abandon the Danish language, ‘a world of impenetrable veil behind which the Danes show their cultural superiority’.

But the Danish language cannot be abolished. The vast majority speaks and writes Danish and cannot help it. The Danish language expresses a Danish experience to the world and it is for most Danes, the natural tool for thinking, communication and creation. Language policy has been a major concern, both because the Danish language is under pressure from outside, and because its mastery is often inadequate. It is therefore natural that Brian Mikkelsen and his predecessor, Elsebeth Gerner Nielsen, took the initiative to examine linguistic issues... Language is a tool and an expression of culture, it reflects our cultural and material history, expresses what we have, need to verbalize and deal with.

Concretely, the Ordinance contained measures which aimed at improving children’s Danish language learning skills with Danish language teaching in public and popular schools, promoting a correct use of the language in the media, its use in scientific publications, and in economic transactions alongside foreign languages.

This policy can be summarized as the result of a double movement. While many of the measures above concerning language sought to limit the expansion of English and ignored immigrants’ own culture, the Ordinance was bent on promoting Danish as an official language within the EU and beyond, in the name of diversity.

In a globalized world, it is worth emphasizing that the Danish language is a contribution to linguistic diversity. Were we all have the same language and same culture, there would be not much to share. The value of linguistic diversity and rights has been stressed by the UN, UNESCO, and the EU in numerous...
resolutions. Danish is an official language in the EU, and a translation in Danish is mandated for all important EU documents.\(^{1013}\)

This “double movement” is reminiscent in particular of the French cultural integration policy which, as described in Chapter One, sought in the same period of time to limit the influence of English by promoting the EU Convention for the protection of minority languages but withdrew from it when Breton activists used it to request cultural group rights. This “exclusivist” tendency highlights a dimension of toleration that is not often underlined, the protection of the national culture at home and its active promotion abroad.

With regard to the preservation of the Danish culture, one of Mikkelsen’s first actions was to lay down in 2002, the Cultural Development Fund set up by Gerner Nielsen. It was the only cultural public institution that had as an aim the funding of immigrants’ cultural productions. Although as mentioned before, it was largely unsuccessful in this aim. The institution’s budget, DKK 5 million (NZD 1.2 million), was re-allocated.\(^{1014}\)

Then in 2005, Mikkelsen gathered seven committees headed by a lead expert and coordinated again by Pr Jørn Lund with the purpose of formulating a Canon of Danish culture.\(^{1015}\) The Canon was said to represent Danish culture. Its goals were to:

- ‘serve as a compass showing the directions and milestones in Denmark's long and complex cultural history’;
- serve ‘as a platform for discussion and debate’;
- ‘provide reference points and awareness of what is special about Danes and Denmark in an ever more globalised world’; and
- strengthen ‘the sense of community by showing key parts of our common historical possessions’.\(^{1016}\)

Four months later at the Conservative Party Annual Conference, in a speech which amounted to a summary of his policy ideas, Mikkelsen declared that:

A medieval Muslim culture will never be equal in this country to the Danish culture, which has grown up on the old piece of land that lies between Skagen and Gedser and between Dueodde and Blåvandshuk. There are still many

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battles to be cast. One of the battles we face is the refusal of immigrants from Muslim countries to recognize Danish and European cultural norms. In the midst of our own country, a parallel society in which minorities practise their medieval norms and undemocratic ways of thinking is taking root.

We have also begun fighting the multicultural ideology, which says that everything is equally good. Because if everything is equally good, everything is trivial and as Conservatives we can not accept that. One can ask: which role does Conservative culture politics play in this cultural battle? My answer is: a very important role. Because it is Conservative policy to strengthen knowledge of our cultural heritage. What shall we be without knowledge of our past? We would become free floating atoms in a weightless universe not knowing where our home is and where we belong.

Our cultural heritage enriches us, and strengthens our identity as Danes, as Danish citizens in a time marked by globalization and mass migration. A cultural rearmament is the best vaccine against undemocratic currents in society. We have also launched the project of formulation of a national culture canon. This will be a gift to all the citizens of our country. It will showcase the most important, and interesting elements of our cultural history. It is also a gift to immigrants who, with it, will have access to the common frame of reference upon which Danish culture is built.¹⁰¹⁷

The speech stirred strong reactions amongst the public. Lund asked for a clarification and two members of the Canon drafting committee threatened to resign. Professor Erik A. Nielsen, a member of the literary section of the Committee, declared that: “If the hidden plan was to have a canon so that we have something with which we can knock culturally illiterate people with on the head, then we have been given a really disgusting task. And I will certainly not help.”¹⁰¹⁸ Another member of the same section, the author, Mette Winge, said that: “She doesn’t want to be part of a nationalist project.”¹⁰¹⁹

Mikkelsen withdrew his words or sought to clarify them. He said that he had been misunderstood:

Several debates are mixed together. One is about the struggle of values as a bulwark against extremist values. It is about democracy, equality and tolerance. The second debate concerns the cultural canon as a gift to the whole population... It is clear that when we have a cultural canon, it will also be used to tell who we are as Danes, and what is the best of Danish arts and culture. It is a gift that everyone can use as they want and it will also be used in relation to immigrants, and that is why the committee chair has proposed that the future canon be released in several languages. If one views the cultural canon as a part of a cultural battle, then I have either expressed myself in a way that you cannot understand or maybe the nuances have not been well understood. I do not even think I have expressed myself

¹⁰¹⁹ Ibid.
wrongly. The cultural canon project is not a political project. It is a gift that I hardly think one can be opposed to.\textsuperscript{1020}

However \textit{Politiken} quoted him as saying in the same interview that: “Yes, [Danish culture] is better. Yes, I am a declared opponent of value relativism because I think something is better than another.”\textsuperscript{1021} A month later, in an interview to the newspaper \textit{Berlingske Tidende}, he fully reinstated his claim that the Canon was part of the fight to preserve Danish culture.\textsuperscript{1022}

In reality, this confrontation with members of the Committee was less about cultural struggle than the “arm’s-length principle”. By declaring that the Canon project was in support of his cultural policy programme, Mikkelsen had infringed this principle which entails that the State “supports but does not guide.” It has been a sacrosanct principle of cultural policy management in Denmark but also in Sweden and other Nordic countries. One must view in this light the committee members and Lund’s objections to Mikkelsen’s speech. These were attempts at defending their personal integrity and saving face. Lund pleaded for art represented by the Canon to be separated from culture:

I personally disagree with the Minister of Culture, he said, because I believe that if we are to succeed in promoting integration, then one should not begin with art but with culture in the strict sense. The art canon is an artistic expression and we have conceived it in that sense. I really think that one should keep those things separate.\textsuperscript{1023}

He was not opposed to Mikkelsen’s cultural policy if one refers only to his article on language policy published in \textit{Politiken}. The two Committee members did not resign either. Another member of the Committee, Jokum Rohde, stated that “It’s too late. We’ve made it and it cannot be misunderstood. And you can never protect your artistic product against any use.”\textsuperscript{1024}

As far back as one can go, from Helveg-Petersen in 1968 to Jytte Hilden, and even in Sweden as exemplified by Olof Palme’s New Cultural Council in 1968, no commission of enquiry had really enjoyed an acceptable degree of independence from ministers. Perhaps Jytte Hilden was only the most open when she wrote in the preface to the English version of the \textit{Politics of Culture}:

\begin{flushright}
\textsuperscript{1020} Ibid. \\
\textsuperscript{1021} Ibid. \\
\textsuperscript{1023} Ibid. \\
\textsuperscript{1024} Ibid. 
\end{flushright}
Politics of Culture was my personal cultural policy initiative. The Danish cultural sociologist, Peter Duelund, contributed his ideas and writing skills. And together we launched the flagship into the modern cultural policy debate.  

The final Canon project as published in 2006 consisted of 96 works. Each of the following sectors was represented by 12 works: art, architecture, photography, design, sculpture, film, literature and theatre. There were 24 works on music among which 12 were classical music and 12 were popular music. A Canon for children’s culture was unveiled as well. A special website (www.kulturkanon.kum.dk), booklet, and teaching materials on the Canon were made available in schools and public libraries. None of these works was authored by a non-Western immigrant or embodied the immigrant experience. The only work which referred to non-Western culture was “Aladdin, eller den forunderlige lampe” (Aladdin and the Wonderful Lamp), a portrait of Aladdin dating from 1805 and made by the artist Adam Oehlenschläger (1779-1850). 

However, it is the conspicuous absence of women (Karen Blixen was the only female author featured) which provoked the strongest criticisms. Three prominent women, Elisabeth Møller Jensen, the director of KVINFO, the Danish Centre for Gender, Equality and Ethnicity, and the literary experts: Pil Dahlerup and Professor Anne-Marie Mai, wrote a joint letter of protest that included a list of potential women whose works could have been included to the Folketing’s Standing Committee on Education.

In response, Lund acknowledged the existence of many works authored by women but he claimed that these did not meet the requirements to be included in the Canon. As one notes, a similar response was given by the Cultural Development Fund regarding the lack of funding of artistic and cultural projects initiated by non-Western artists. Nevertheless the Canon became a bestseller, nine times topping the best sellers list.

Mikkelsen also took a stronger approach to privatization. This was characterized by restrictive legislation geared at enforcing the liberal minimum such as the ban against FGM in 2003. However, in conformity to the harm principle, while the burqa and other types of veil were unabashedly described as forms of submission and oppression of women, the

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1026 The organization is autonomous but affiliated to the Danish Ministry of Culture. See Kvinfo, available at http://forside.kvinfo.dk/, last accessed 23 June 2011.
1028 See previous sub-section.
Conservatives did not succumb to the pressure exerted by the Danish People’s Party to ban it as had happened in France.\textsuperscript{1030}

The year before the government had passed a new immigration law restricting family reunification in order to avert forced and pro-forma marriages.\textsuperscript{1031} The law raised the minimum age for reunification with a foreign spouse from 18 to 24 years. Despite allegations that the prime motive of this law was the restriction of non-Western immigration, in the frames held by conservative politicians, forced or arranged marriages were seen as despicable and alien to Danish culture.\textsuperscript{1032}

Lastly, following the publication of 12 caricatures of the Prophet Muhammed in \textit{Jyllands-Posten} on 30 September 2005, 10 ambassadors from Muslim countries accused Mikkelsen of having incited “the attack” with his previous controversial speech at his party’s national conference.\textsuperscript{1033} They requested a meeting with the Prime Minister, Anders Fogh Rasmussen, to solve the crisis. The Prime Minister refused, arguing that “freedom of speech has important repercussions on the Danish society, and the government does not have either the right or the means of influencing the press.” While he agreed with the ambassadors that an interfaith and intercultural dialogue was needed, he advised them to seek a solution in the court since religious blasphemy or discrimination was condemned by the law.\textsuperscript{1034}

Indeed, a complaint against the publications was filed by a private individual at a police station in Aarhus, the second largest city in Denmark. The regional (Viborg) public prosecutor found no “reasonable presumption that a punishable offence to be prosecuted by the public has been committed.”\textsuperscript{1035} His decision was confirmed by a decision of the Director of Public Prosecutions.\textsuperscript{1036} While for Muslims the publication of the cartoons was a case of psychological harm that demanded redress, Rasmussen and other public officials considered instead the harm that censorship would inflict on the freedom of expression of the majority.

The situation described above has the same overtones and raises the same theoretical questions as the controversy over the publication of the “Satanic Verses” discussed in Chapter One. What is the appropriate reaction when freedom of expression is pitted against the preservation of religious feelings (freedom of religion)? If one favours freedom of expression, does one have the freedom to be racist? If one condones the accusation of religious blasphemy, does it constitute a case of psychological and/or self-regulating harm?

The debate among scholars on these questions is fairly recent\textsuperscript{1037} and decision makers equally seem to lack solutions. In one of its rulings, the European Court of Human Rights stated that one should give “a wide margin of appreciation to the individual state, because in this area the national authorities also act to safeguard freedom of religion.”\textsuperscript{1038} However as the following table shows, even in the presence of a non-ideological consensus on the general cultural integration policy line (toleration), within policy variations (minimal toleration and mutual toleration) make reaching a consensus difficult to achieve on this issue.


\textsuperscript{1038} Ibid.
Table 6: Danish Ministers of Culture and cultural integration policies, 1968-2006

<table>
<thead>
<tr>
<th>Minister</th>
<th>Party</th>
<th>Coalition</th>
<th>Duration</th>
<th>Policy report</th>
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<td>Brian Mikkelsen</td>
<td>Conservative</td>
<td>C+L+DPP</td>
<td>2001-2008</td>
<td>Minimal Toleration</td>
</tr>
<tr>
<td>Elsebeth Gerner Nielsen</td>
<td>Radical Liberal</td>
<td>SD+RL</td>
<td>1998-2001</td>
<td>Mutual Toleration</td>
</tr>
<tr>
<td>Ebbe Lundgaard</td>
<td>Radical Liberal</td>
<td>SD+RL</td>
<td>1996-1998</td>
<td>Mutual Toleration</td>
</tr>
<tr>
<td>Jytte Hilden</td>
<td>Social Democrat</td>
<td>SD+RL+CHP+CD</td>
<td>1993-1996</td>
<td>Multiculturalism (non-implemented)</td>
</tr>
<tr>
<td>Grethe Røstbøll</td>
<td>Christian Democrat</td>
<td>L+C</td>
<td>1990-1993</td>
<td>Non-policy</td>
</tr>
<tr>
<td>Ole Vig Jensen</td>
<td>Radical Liberal</td>
<td>RL+L+C</td>
<td>1988-1990</td>
<td>Non-Policy</td>
</tr>
<tr>
<td>Mimi Stilling Jacobsen</td>
<td>Christian Democrat</td>
<td>CD</td>
<td>1982-1986</td>
<td>Non-policy</td>
</tr>
<tr>
<td>Lise Østergaard</td>
<td>Social Democrat</td>
<td>SD+L</td>
<td>1980-1982</td>
<td>Non-policy</td>
</tr>
<tr>
<td>Niels Matthiasen</td>
<td>Social Democrat</td>
<td>SD</td>
<td>1975-1980</td>
<td>Non-policy</td>
</tr>
<tr>
<td>Nathalie Lind</td>
<td>Liberal</td>
<td>L</td>
<td>1973-1975</td>
<td>Non-policy</td>
</tr>
<tr>
<td>Niels Matthiasen</td>
<td>Social Democrat</td>
<td>S D</td>
<td>1971-1973</td>
<td>Non-policy</td>
</tr>
<tr>
<td>K. Helveg Petersen</td>
<td>Radical Liberal</td>
<td>RV+L+C</td>
<td>1968-1971</td>
<td>Non-policy</td>
</tr>
</tbody>
</table>


6.2.2 Sweden: The Celebration of Difference

On 23 February 1993, following the Riksdag’s recommendation, Carl Bildt, the Conservative leader of the ruling right-wing coalition, asked Birgit Friggebo, the Liberal Minister in charge of Culture and Immigration, to set up a parliamentary commission on cultural policy. The
Commission named “Kulturutredningen” (Enquiry on Culture) was enjoined not only to evaluate the 1974 policy bill but also to identify the challenges and opportunities lying ahead as well as new overarching goals.\textsuperscript{1039}

On 13 March 1993, Friggebo appointed no less than Ingemar Mundebo, the director of Riksrevisionsverket, the National Audit Bureau, and a Liberal as well. However, on 9 December 1994, following the Social Democrats’ coming to power, the new Minister of Culture, Margot Wallström, and a stalwart of the SAP, replaced Mundebo with a Social Democrat, Gerd Engman. As one notes, like the New Cultural Council of 1968 and many other commissions of enquiry, the composition and leadership of this commission reflected political partisanship.


\begin{itemize}
  \item In a relatively short period of time, it said, the Swedish population’s ethnic composition has changed. There are 1.7 million immigrants\textsuperscript{1040} with a different cultural background. Unfortunately, social segregation, dependency on welfare allowances and unemployment have increased among these immigrants. They are fuelled by the current high general unemployment but also discrimination, ignorance, xenophobia, lack of inter-ethnic contacts, low education, lack of trust in politicians and immigration policy, lack of travel experience, feelings of powerlessness and low self-confidence.\textsuperscript{1041}
  \item Yet, despite this negative feedback, multiculturalism was kept as one of the seven policy goals but redefined as “Mångfald” (diversity).\textsuperscript{1042} “In such a context”, it stated, “an appropriate cultural policy is crucial for the advent of a genuine multicultural society where people with different backgrounds would be able to live peacefully together and enrich each other.”\textsuperscript{1043} Two core ideas were embodied in this concept: \textit{ethnocultural diversity as}
\end{itemize}

\textsuperscript{1039} SOU 1995:84 Kulturpolitikens inriktning, p. 3.
\textsuperscript{1040} This statistic includes people born in Sweden with at least one parent who is an immigrant.
\textsuperscript{1042} Betänkande 1996/97:KrU1 Kulturpolitik, m.m. prop. 1996/97:3 och prop. 1996/97:1 utgiftsområde 17.
\textsuperscript{1043} Tawat, Mahama (2006) Multiculturalism and Policymaking, p. 34.
enrichment for national culture, and as an effective means of combating racism and xenophobia.

While this was a departure from the 1974 Bill which emphasized the cultural embeddedness of immigrants, it still amounted to the celebration of difference. Similarly to its socioeconomic integration policies, and in contrast to the previous policy, the Swedish government was eager to implement them. Despite the raging economic crisis, migration issues had become too important to be left on “the backburner” as in the late 1970s and 1980s. And it was assumed that the benefits of cultural diversity outweighed its disadvantages.

A) 1996-2003: Ethnocultural Diversity as a Stimulus for the National Culture and a Remedy against Racism and Xenophobia

Concretely, the Bill claimed that the injection of new cultural expressions by immigrants would be a stimulus, a source of renewal and improvement for Swedish culture and immigrants themselves. More diversity rather than less was needed to tackle discrimination and xenophobia. Lastly, diversity itself was the essence of life. Consequently, diversity, “mångfald”, was added as a new policy goal and mainstreamed into other policy goals. The “international cultural cooperation” goal took on a whole new meaning. While it was conceived in the first National Cultural Policy and, as in Denmark, as the opportunity for Swedish cultural productions to be shown abroad and vice-versa, there was now a claim that the country would benefit from the ethnocultural diversity which comes with increased globalisation, if one could draw on its positive aspects. In any case, globalisation and ethnic diversity were here to stay and it was better to adopt a positive predisposition toward them.

Thus, in a section and a sub-section respectively named “Vissa övergripande frågor” (Som Wide-Ranging Issues) and “Mångfald and internationellt samarbete” (Diversity and International Cooperation), it was observed that:

during the last decade, Europe’s walls have tumbled down and its borders have opened giving way to confrontations between cultures and groups. Differences in living conditions, soaring crime levels, drug abuse, rising unemployment are fuelling these problems. While some of these differences are irreconcilable, there is hope and there is a will among many people and groups of building a humane society where different cultures can exist and enrich each other.

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During the handling of the Bill, from its arrival on the table of the Riksdag’s Standing Committee on Culture on 18 September 1996 to its final discussion in a plenary session on 19 December 1996, lawmakers, irrespective of political creed, made no objection to its multicultural orientation. On the contrary, they sought to strengthen the government’s policy. During the handling of the Bill in the Standing Committee, the Liberal Lars Leijonborg requested that the government provide more details about the third goal of the policy: “the promotion of cultural diversity, artistic innovation and quality.”\(^{1049}\) The Social Democrats, Pär-Axel Sahlberg and Juan Fonseca, asked for more specifications about the programme of education for the promotion of immigrants’ cultural expressions.\(^{1050}\) The Communist Eva Zetterberg asked for more information on the project of construction of a Kurdish Cultural Centre.\(^{1051}\) The Centrist Olof Johansson requested more explanation about the need expressed by the government for more diversity and a decentralized culture in west Sweden.\(^{1052}\)

During the plenary session, the Social Democrats Lars Stjernkvist, Berndt Ekholm and Lena Larsson asked the government to give priority, as in the previous Bill, to disadvantaged groups including immigrants, persons with disability, women and people living in rural areas.\(^{1053}\) The ecologists Birger Schlaug, Marianne Samuelsson, Ewa Larsson, Per Lager, Elisa Abascal Reyes, Eva Goës, Peter Eriksson, Gudrun Lindvall and Ragnhild Pohanka stated that one needs to safeguard the Swedish and Nordic heritage while the Swedish society opens itself to impulses, ideas and culture from the rest of the world.\(^{1054}\) But this does not mean that there were not problematic issues between political parties. There was debate about the transfer of the central administration of the three museums from Stockholm to Gothenburg and difference of opinion over commercialism and the use of sponsorship.\(^{1055}\)

After the passage of the Bill, the government instituted a working group named *Forum för världskultur* (Forum for World Culture), which was directed to oversee the implementation of 6 specific policy measures:\(^{1056}\)

- The first measure was meant to give assistance to immigrant organisations or institutions dealing with non-Western cultures. For example, the Forum

\(^{1049}\) Motion 1996/97:Kr 17.  
\(^{1050}\) Motion 1996/97:Kr 216.  
\(^{1051}\) Motion 1996/97:Kr 246.  
\(^{1052}\) Motion 1996/97:Kr283 8.  
\(^{1053}\) Motion 1996/97:Kr1.  
\(^{1055}\) An in-depth study of the way policymakers have dealt with national culture in Swedish cultural policy is provided by Harding, Tobias (2007) *Nationalising Culture.*  
initiated in 1999 the project “Världsmusik och dans” (World Music and Dance) in order to assist immigrants’ dance and music groups.

- The second measure was the initiation and implementation of own projects. In the report SOU 1997:95, “Forum för världskultur - Ett rikare kulturliv” (Forum for World Culture - a Richer Cultural Life), the Forum concluded that Södra Teatern, one of Stockholm’s most reputable theatre halls which the government had sought as a hosting space for Världskultur Hus (World Culture House), lacked adequate infrastructures for that purpose. Instead, a Commission, SOU 1998:25\(^{1057}\) was appointed to oversee the promotion of foreign artistic and cultural expressions often ignored because of prejudices in established institutions or for commercial motives.\(^{1058}\) It put forward a more grandiose project; a system of four museums devoted to world cultures: the National Museums of World Culture. Its blueprint was put forth in the report: SOU 1998:125. “Statens museer för världskultur” (National Museums for World Culture) and it started to be implemented in 1999. The four museums devoted to world cultures and governed by a museum authority are: the Museum of Ethnography, the Museum of Mediterranean and Near Eastern Antiquities, the Museum of World Culture and the Museum of Far Eastern Antiquities.\(^{1059}\)

- The third measure was the facilitation of cultural encounters between all the stakeholders (artists and cultural practitioners) involved in the promotion of non-Western cultures. The Forum set up the project, “Världsteaterprojektet” (World Theatre Project) which brought together theatre groups in Sweden with one in each of China, India and Mozambique, through a series of exchange travel studies.

- The fourth measure was the provision of information to the wider public and


\(^{1058}\) SOU 1997:95, pp. 27-32.

\(^{1059}\) As it is, the majority of the museums’ directors have been Danish nationals as well as the co-director of the famous Te Papa, New Zealand’s national museum. It is unclear if this is owing to the good quality of museum administrators produced by Danish educational institutions, or if these directors cannot find work at home because of the assimilationist nature of their country’s policy. See Statens Museer för Världskultur. Four museums that open windows to a changing world available at http://www.smvk.se/smvk/jsp/polopoly.jsp?d=156, last accessed 15 June 2010. For a behind-the-scenes but partial account of the process of creation of the Museum of World Culture see Fiskesjö, Magnus (2007) “The Trouble with World Culture: Recent Museum Developments in Sweden,” Anthropology Today, 23.5, October, pp. 6–11.
interested parties about the activities of the Forum for World Culture. The Forum started a website, www.forumkultur.com, and organized seminars with representatives of other Nordic countries in order to exchange views and experiences.\textsuperscript{1060} It also devoted its two last reports to the execution of this project: SOU 2000:15 “Delrapport. Forum för världskultur” (Partial Report. Forum for World Culture), and SOU 2000:118 “Jag vill leva, jag vill dö i Norden” (I want to live, I want to die in the North), the second line in the chorus of Sweden’s national anthem.

• The fifth measure was meant to encourage discussion and debate on the issue of cultural diversity itself. The Committee organized an exhibition on religious diversity called “Gud har 99 namn” (God has 99 Names) in cooperation with Kulturhuset, Stockholm’s Culture House, the Swedish Travelling Exhibitions, and the association Worldwide Wisdom.

• The sixth measure was intended to boost cooperation between cultural institutions, associations and municipal councils. To that aim, the project, “världsmusiktältet” (World Music Tent) was set up. It was billed as a regional tour of foreign-born musicians and dancers. However, the project was cancelled after a key member became sick.\textsuperscript{1061}

\textbf{B) 2003-2006: Bringing Ethnocultural Diversity to State Cultural Institutions and the Public}

As with its socioeconomic integration policy during this period,\textsuperscript{1062} the Swedish government wanted to achieve more results. Concrete measures were devised to achieve better results which included the creation of a World Cultures’ Museum and the implementation of the “Dagordning för kultur 2003-2006” (Agenda for Multiculturalism).\textsuperscript{1063} In 2003, the Minister of Culture, Marita Ulvsckog, drafted a new action plan, “Dagordning för kultur 2003-2006” (Agenda for Multiculturalism) with two main objectives: the celebration of a Year of Multiculturalism in 2006,\textsuperscript{1064} and an investigation into the way publicly funded cultural institutions implemented ethnocultural diversity in their services.\textsuperscript{1065} The Multicultural Centre,

\begin{flushright}
\begin{tabular}{l}
\textsuperscript{1060} SOU 2000:118, p. 45. \\
\textsuperscript{1061} SOU 2000: 118, pp. 25-33 \\
\textsuperscript{1062} For more details, see Chapter 4 on the Socioeconomic Integration Policies of Denmark and Sweden. \\
\textsuperscript{1063} SOU 2005:91 Delbetänkandet Agenda för mångkultur. Programförrklaring och kalenderium för Mångkulturåret 2006. \\
\textsuperscript{1064} Direktiv 2004:169. \\
\textsuperscript{1065} Prop. 2003/04:1.
\end{tabular}
\end{flushright}
a centre for the research and promotion of multiculturalism\textsuperscript{1066} situated in Botkyrka, a suburb of Stockholm, with a high concentration of immigrants, was commissioned to make an evaluation.\textsuperscript{1067}

The Centre’s working group submitted a questionnaire to top officials of sixty-three cultural institutions and reviewed their annual activity reports. It also interviewed fifty-five officials of eighteen cultural institutions.\textsuperscript{1068} In the final report “\textit{Tid för mångfald}” (Time for Diversity) published in 2004, the working group disclosed that, while the majority of respondents have claimed to have implemented such a plan and reported back on their efforts to the Ministry of Culture, this was not true. In reality, employees with an immigrant background were often at the bottom of the hierarchy, most of these institutions lacked a diversity plan and their activity report showed few tangible results. Lastly, it revealed that there were fears among producers that diversity plans would undermine artistic production.\textsuperscript{1069} It also proposed a series of solutions and more importantly, gave to immigrants artists the opportunity to describe their own experiences and hopes in an anthology named “\textit{Mångfald i kulturlivet}” (Diversity in Cultural Life).\textsuperscript{1070}

In 2004, the government appointed as national coordinator for the preparatory committee of the Year of Multiculturalism in 2006, Yvonne Rock, a theatre producer of Jewish background. According to the government’s terms of reference, the purpose of such a celebration was to:

permanently extend the range of opportunities for people living in Sweden to participate in cultural life, and to bring about interplay between prevailing cultural traditions. A further aim was to devise incentives for those responsible for publicly financed cultural activities to clearly reflect and incorporate the ethnic and cultural diversity that exists in Sweden today.\textsuperscript{1071}

In 2005, the government requested that all state cultural institutions, universities, fifty-four Swedish embassies and 630 other public institutions including regional councils, local councils and associations organize and/or take part in activities marking the Year of Multiculturalism in 2006. The festivities started on 11 February 2006 and were billed a success.

\textsuperscript{1066} Mångkulturellt centrum available at http://www.mkc.botkyrka.se/, last accessed 19 June 2010.
\textsuperscript{1067} Pripp, Oscar; Plisch, Emil and Printz Werner, Saara (2004) \textit{Tid för mångfald: Utgångspunkter och resultat.}, Botkyrka: Månkulturellt centrum.
\textsuperscript{1068} Ibid., pp. 9-10.
\textsuperscript{1069} Ibid., pp.19-23.
according to the evaluation made by the review committee the following year in the report “Mångfald är framtiden” (Diversity is the future), SOU 2007:50.\footnote{SOU 2007:50, pp. 26-28}

In contrast to their Danish counterparts, Swedish policymakers did not have any objection to issues such as arranged marriages and the wearing of the Islamic veil. They are legal in Sweden and have not been grounds for immigration restrictions. There is hardly any reference or reservation on these issues among the legislation mentioned above. Furthermore, as Bleich predicted, the celebration of ethnocultural diversity became a norm in the sense that it was found at different levels of the society.

For example, in an advertisement published in a newspaper in 1992 by the carmaker Volvo, a banner reads: “What would Volvo be without immigrants?”\footnote{This translation is mine.} The contribution of immigrants and the diversity of the workforce are described in laudatory terms.\footnote{Svanberg, Ingvar and Tydén, Mattias (1992) Tusen år av invandring, p. 339.} Similarly, the iconic furniture maker, IKEA launched in 2006 a campaign of advertisement “Länge leve mångfalden” (Long Live Diversity) displaying portraits of members of different ethnic groups made of small pieces of puzzle.\footnote{Hyltén-Cavallius, Charlotte and Hübinette, Tobias (2008) “Mångfaldsestetiken är här – med 20 års fördröjning!”, Invandrare & minoriteter, May. The project was started in 2006 which is the reason why it is included in this study but ran until the summer of 2008.} Many issues related to diversity were introduced in the educational curriculum of teachers.\footnote{For a useful account see Carlson, Marie and Rabo, Annika (2008) Uppdrag mångfald. Lärarutbildning i omvandling, Umeå: Boréa.}

As part of the Year of Multiculturalism, the photographic exhibition: War & Love – About Immigration to Northern Europe, by Danish photographer Henrik Saxgren, and funded by Sweden-based Hasselblad Foundation, Danish-based Velux Foundation and the Nordic Culture Fund was staged at the Museum of World Culture in Gothenburg from 21 January to 26 February 2006. The exhibition chronicled immigrants’ journeys to Scandinavia in a favourable light and toured Scandinavia for the following two years.\footnote{Hasselblad Foundation. Erna och Victor Hasselblads Stiftelse (2011) “Henrik Saxgren. War & Love - About Immigration to Northern Europe, 21 January – 26 February 2006” available at http://www.hasselbladfoundation.org/henrik-saxgren/, last accessed 25 June 2011.} The country has also been cited as an example for the way it uses the transnational links between immigrants and their home country to further its economic and cultural interests. The table below shows continuity and non-ideological consensus in the cultural integration policies of Sweden from 1974 to 2006.
### Table 7: Swedish Ministers of Culture and cultural integration policies, 1968-2006

<table>
<thead>
<tr>
<th>Minister</th>
<th>Party</th>
<th>Coalition</th>
<th>Duration</th>
<th>Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lene Adelsohn-Liljeroth</td>
<td>Conservative</td>
<td>C+Cen+CHD+L</td>
<td>2006-present</td>
<td>Promotion of ethnocultural Diversity</td>
</tr>
<tr>
<td>Lars Leijonborg</td>
<td>Liberal</td>
<td>C+Cen+CHD+L</td>
<td>16 Oct 2006 (acting)</td>
<td>Promotion of ethnocultural Diversity</td>
</tr>
<tr>
<td>Leif Pagrottsky</td>
<td>Social Democratic</td>
<td>SD</td>
<td>2004-2006</td>
<td>Promotion of ethnocultural Diversity</td>
</tr>
<tr>
<td>Pär Nuder</td>
<td>Social Democratic</td>
<td>SD</td>
<td>2004-2004</td>
<td>Promotion of ethnocultural Diversity</td>
</tr>
<tr>
<td>Marita Uvskog</td>
<td>Social Democratic</td>
<td>SD</td>
<td>1996 - 2004</td>
<td>Promotion of ethnocultural Diversity</td>
</tr>
<tr>
<td>Margot Wallström</td>
<td>Social Democratic</td>
<td>SD</td>
<td>1994 - 1996</td>
<td>Promotion of ethnocultural Diversity</td>
</tr>
<tr>
<td>Birgit Friggebo</td>
<td>Liberal</td>
<td>Cen+C+L+CHD</td>
<td>1991 - 1994</td>
<td>Immigrants’ cultural embeddedness</td>
</tr>
<tr>
<td>Bengt Göransson</td>
<td>Social Democratic</td>
<td>SD</td>
<td>1989 - 1991</td>
<td>Immigrants’ cultural embeddedness</td>
</tr>
<tr>
<td>Lennart Bodström</td>
<td>Social Democratic</td>
<td>SD</td>
<td>1985 - 1989</td>
<td>Immigrants’ cultural embeddedness</td>
</tr>
<tr>
<td>Lena Hjelm-Wallén</td>
<td>Social Democratic</td>
<td>SD</td>
<td>1982 - 1985</td>
<td>Immigrants’ cultural embeddedness</td>
</tr>
<tr>
<td>Jan-Erik Wikström</td>
<td>Liberal</td>
<td>(1) Cen+C+L (2) L (3) Cen+L (4) C+L</td>
<td>1976 - 1982</td>
<td>Immigrants’ cultural embeddedness</td>
</tr>
<tr>
<td>Bertil Zachrisson</td>
<td>Social Democratic</td>
<td>SD</td>
<td>1973 -1976</td>
<td>Immigrants’ cultural embeddedness</td>
</tr>
<tr>
<td>Ingvar Carlsson</td>
<td>Social Democratic</td>
<td>SD</td>
<td>1969 -1973</td>
<td>Immigrants’ cultural embeddedness</td>
</tr>
<tr>
<td>Olof Palme</td>
<td>Social Democratic</td>
<td>SD</td>
<td>1968-1969</td>
<td>Immigrants’ cultural embeddedness</td>
</tr>
</tbody>
</table>

*She resigned 10 days after her appointment over revelations that she and her husband had failed to pay taxes after employing a nanny, and for a TV license for more than a decade. Söderling, Fredrik (2006) “Cecilia Stegö Chilò avgår”, available at http://www.dn.se/kultur-noje/cecilia-stego-chilo-avgar, last accessed 16 June 2011.
Yet Swedish policymakers have not accepted indiscriminately every aspect of immigrants’ cultures. They have imposed a *liberal minimum* which, as described in Chapter One, limits cultural practices which the host society views as so repugnant that it would not even tolerate them despite its commitment to cultural diversity. On this account, the content of Swedish and Danish policies are very similar concerning FGM and honour crimes, two examples which typify the liberal minimum based on the harm principle.

Sweden was in fact one of the first countries in Europe to pass a bill against FGM and then to make it a crime. The Bill, Prop. 1981/82:172 *om förbud mot omskärelse av kvinnor* (Interdiction against FGM), was passed in 1981. The following year, it was added as a supplement to the law against human trafficking; thus becoming a law: Lag. 1982:316 *med förbud mot könstypning av kvinnor* (Law against FGM). Only in 2003 was FGM made a crime punishable by up to six years of prison in Denmark under Sections 245 and 246 of the Danish Criminal Code.

In both countries, pieces of legislation were expanded to prosecute cases performed abroad even in a country where FGM is legal, such as in Sudan and Somalia. A duty to report by family members, social workers, medical practitioners and the public at large even in suspicious cases, was enforced in both the law and the Social Services Act. The aim was to remove the principle of double incrimination and prevent parents circumventing the law by performing FGM on their daughters in their countries of origin. Furthermore, both governments ratified the UN Convention on the Rights of the Child of 1989 which forbids it.

Sweden’s authorities have shown a determination as strong as their Danish counterparts to fight honour crimes. Following the dramatic murder of Fatima Sahindal, a Kurdish-born Swede, Swedish parliamentarians strengthened the law against honour crimes by raising the legal marriage age from fifteen to eighteen years. The Integration Board, *Integrationsverket*, launched several programmes aimed at empowering immigrant women. But even before the

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Affair, Mona Sahlin, the Minister of Integration had declared that: “In Sweden it is some values that you can either like or dislike, but they are prevailing here. I do not tolerate racists or homophobes, and I do not tolerate that multiculture [sic] is used as an argument for subjecting girls.”

The affair was the second major public saga concerning immigrants after John Ausonius’s sniping at foreign looking men in the early 1990s. Starting in 1998 Sahindal had refused an arranged marriage with a kinsman from Turkish Kurdistan and fell in love afterwards with a native Swede, Patrick Lindesjös. Following threats from male family members, she sought protection from the police and women’s refuges. She became a campaign activist against forced marriages and was invited to address the Swedish parliament on the issue. However, the confrontation with her father continued until 2002 when he shot her to death during a secret visit to her mother and sisters.

Despite governments’ claims that honour crimes and FGM are not condoned by Islam, it has been difficult to reconcile a multicultural policy and the liberal minimum. Given the little success achieved in the fight against FGM and honour crimes, many observers have claimed immigrants’ cultures and the Swedish culture are incompatible. To paraphrase Susan Möller Okin, it has been asked if multiculturalism is not bad for women. In her speech in the Swedish parliament, Fadime Sahindal blamed the society and the Kurdish Association for failing in their responsibility. While she declared she was not bitter, she hoped that such a situation would never occur again. Therefore “it’s important not to shut our eyes to the situation of girls from immigrant families”. Thus, despite divergent cultural integration policies as the figure below shows, Danish and Swedish policymakers have, in common, enforced the minimum liberal.

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1084 See Chapter Four for details.
1088 Fadime Sahindal’s Speech at the Swedish Parliament.
Figure 10: The Evolution of Danish and Swedish Cultural Integration Policies mid-1970s-2006

Swedish New Cultural Council (1968) -------- Danish Ministry of Culture’s Taskforce (1968)


Cultural embeddedness -----------Non-policy as aversion to multiculturalism

Sweden’s Prop. 1996/1997:3 and (1) 1996 Multicultural Denmark
(2) Radical liberal approach
to Toleration (1996-2001)

Ethnocultural difference as beneficial ----------- (1) Multiculturalism as fair and unavoidable
the Swedish society itself in cultural,
democratic, social and economic terms
(2) Pre-eminence of the national culture but
acceptance of immigrants’ cultures in
the public sphere

2003 Swedish Agenda for Multiculturalism and the 2003 Project of Danish Canon of Culture

Implementation of ethnocultural diversity ----------- Materialization of Danish cultural heritage
in public cultural institutions in daily life and promotion of Danish
language
In line with the politics of toleration, Danish policymakers, in general, gave pre-eminence to the national culture and avoided giving any formal recognition to immigrants’ cultures. Between 1969 and 1993, as for their socioeconomic integration policies, they refused to put it on their agenda even as they advocated other forms of cultural pluralism. It is only after the aborted attempt by Jytte Hilden to introduce multiculturalism during her term (1993-1996) that Ministers in charge of Culture began to address immigrants’ cultural issues (reactive sequence). However, despite mounting problems with ethnocultural diversity, assimilation was maintained (negative feedback mechanism).

Subsequent ministers conceived and implemented policies aiming at consolidating the national culture. On the one hand, there were Gerner Nielsen’s projects: *Det danske sprog skal styrkes - ikke værnes* (The Danish language must be strengthened - not defended), *Herfra min verden går. Dansk identitet i fortid, nutid og fremtid* (From Here My World Go. Danish Identity Yesterday, Today and Tomorrow). On the other hand, there were Mikkelsen’s language plan *Sprog på spil* (Language in the Balance) and the mammoth Canon of the Danish Culture.

Yet they did not resort to enforced assimilation despite having the capacity of doing so. Instead they urged immigrants to either follow ethnic Danes’ cultural beliefs and practices or keep theirs in the private sphere (privatize) as long as they did not contradict the majority culture. These policies varied slightly according to each Minister in charge of Culture’s political affiliation.

Radical Liberal ministers, following a path going back to the Historic Compromise on Culture of 1953 and beyond and reflecting the concept of mutual toleration, gave an amount of respect and standing to immigrants’ cultures in the public sphere. By contrast, the Conservative Minister, Brian Mikkelsen, in line with his political creed, applied a stronger form of toleration by enforcing the demarcation line between the private and the public sphere, and the liberal minimum as illustrated by the Cartoons Controversy in 2005/2006.

In Sweden, an equally strong non-ideological consensus grounded the two Swedish cultural policies in the celebration of difference. The period stretching between 1974 and 1996 during which Prop.1974:28 was characterized by cultural embeddedness. That is, the belief that immigrants’ pursuit of the good life depends on the opportunity given to them of enjoying their own cultures. Its aim was to create opportunities for immigrants to safeguard and enjoy their cultural practices following an enquiry which concluded that immigrants were a disadvantaged group, isolated from the rest of the society.
The second Cultural Policy, Prop. 1996/97:3 passed in 1996, was not initiated as the consequence of a reactive sequence as in Denmark. As the policy was in its second decade, the time had come for its evaluation as Sweden’s policy making traditions requires. However, despite the negative feedback which policymakers received from the evaluation of the first Bill (implementation failure) and other environmental factors such as the “retreat” of multiculturalism, globalization, and the success of the far-right party *Ny Demokrati* (New Democracy), they maintained the same path. They adopted the main view that ethnocultural diversity is a source of cultural enrichment - another dimension of the celebration of difference - and more diversity, not less, was needed to fight xenophobia and discrimination.

Over the course of the next decade, the Bill spawned numerous policy initiatives aimed at implementing and measuring diversity in central public cultural institutions and at grassroots levels. There were the creation of a system of four museums for world culture, an enquiry into the implementation of cultural diversity by public cultural institutions, and the publication of a collection of immigrant cultural workers’ experiences and hopes. Regional multicultural councilors in charge of promoting diversity were appointed and a Year of Multiculturalism was organized in 2006.

While decision makers on both sides also emphasized cultural heritage, language and international cultural exchanges, the contexts of these policies and meanings differed. Danish politicians looked at cultural heritage and language as the mainstay of their cultural policy and their first line of defence against globalization and multiculturalism. International cultural exchanges were conceived as an outward forum where Danish culture will meet other cultures, show its strength and from whatever “injuries” sustained, reflect back and explore new strategies of survival. By contrast, their Swedish peers viewed cultural heritage as a natural occurrence, a ‘fact of life’ which deserved consideration but did not lend itself to the same urgency as the promotion of diversity. International cultural exchanges became part of the process of fertilization and enrichment of the national culture.

These dynamics also conform to the logic of path dependence. The main axis of Sweden’s 1974 cultural policy was to bring into actuality the cultural needs of disadvantaged groups designated as immigrants but also unemployed people, senior citizens, persons with disability, and those living in the countryside. In Denmark, cultural heritage first mentioned as a policy goal in White Paper 517 in 1969 remained as such throughout these years as well as the refusal to recognize or give any importance to immigrants’ cultures.

By the year 2006, these respective ideas had become norms in both countries in the sense that they were present at various levels of their societies. If one can point to similarities between the two countries, they reside in the fact that the 1990s and the 2000s marked periods
of policy consolidation and they both enforced a liberal minimum regarding issues such as FGM and forced marriages.
General Conclusion

i) Summary

I have argued that Danish and Swedish integration policies diverged in the cultural domain and converged in the socioeconomic domain. The main factors contributing to this divergence were the agency of Olof Palme as an activist gatekeeper and the legacy of the Danish 1953 Historic Compromise on Culture. This divergence occurred from the mid-1960s. Prior to this period, the two countries displayed similar integration policy backgrounds, except for the fact that naturalisation was always more restrictive in Denmark than in Sweden, and agenda setting differed between 1850 and 1930 before following the same trend thereafter.

During the first phase, 1850-1900, owing to its precarious economic situation, Sweden was a country of emigration, notably to Denmark. Therefore the country’s authorities sought above all to restrict emigration. Conversely, owing to a better economic situation, their Danish counterparts sought to control immigration and enforce regulations intended to preserve law and order as illustrated by the Law on the Control of Foreigners and Travellers of 1875. The main consequence of this law was the summary deportation or expulsion of economic migrants when they became destitute or lacked proper identity papers, and the estrangement of visible foreigners such as Tartars and Gypsies who—because of racial prejudices—were perceived as public threats.

During the second phase, 1900-1930, as Sweden’s economic situation improved, it became, like its neighbour, a country of immigration and host to Galician farm workers from current Eastern Poland and Western Ukraine. However, despite similar power configurations with Conservatives in power and Social Democrats in opposition in both countries, the efforts of Social Democrats and activists to improve regulations on immigrants’ working conditions failed in Sweden but succeeded in Denmark as illustrated by the passage of the 1908 law. Swedish authorities passed instead a Deportation Act in 1914 similar to the Danish 1875 law, which was geared toward issues of law and order. This differential outcome can be explained by the fact that Denmark had already dealt with issues of law and order.
During the third phase, 1930-1940, both countries’ policies toward immigrants converged. The coming of the Social Democrats into power in both countries in the late 1920s and early 1930s allowed them to start the implementation of their programme of social welfare protection: “Denmark for All” in Denmark, and the “People’s Home” in Sweden. They cast their social nets as wide as to include immigrants. With the passage of the Law of 1927 on Deportation and Employment Rules, Swedish authorities “made up” for their delay on Denmark and even took a lead as Denmark’s founding welfare law arrived only in 1933. Yet, racialized ideas were prevalent in policy circles. As a consequence, in 1938 both countries imposed the J Pass, a stamp on German Jewish refugees’ passports which allowed them to be recognized and turned down at the border.

The end of these racialized policies occurred on 1 October 1943 with the escape to Sweden of Danish Jews fleeing deportation to concentration camps. In addition, both countries sought to strengthen immigrants’ and refugees’ rights by signing and promoting various international human rights instruments, notably the 1951 Geneva Convention relating to the Status of Refugees. They also consolidated post-war labour migrants’ socioeconomic rights by ensuring equal wages and trying various schemes of incorporation regimes such as spatial dispersal, devolution to private association and burden sharing between states, local councils and charity organizations.

However, concerning citizenship, criteria for naturalization were always more restrictive in Denmark than in Sweden, even though they applied the same system of transmission: *jus sanguinis*, citizenship acquisition by descent. Language and the observance of Danish cultural elements became requirements in 1866 following the country’s territorial losses in the 1864 War of Schleswig-Holstein as authorities sought to establish who belonged to the nation state. They were reinforced in 1935. In contrast to Sweden, Denmark rejected dual nationality and formulated a citizenship test after 1990.

But this traumatic event also shaped Danish cultural policy in a way that would later prevent the adoption of multiculturalism. After the war, a writer, educator and theologian, Grundtvig emerged on the national scene preaching a doctrine about the emancipation of masses through popular education, a people-centered church theology, and a love of the country inspired by Herder. Grundtvig became a national figure and his ideology became popular.

Grundtvig’s ideology found particular resonance with the Radical Liberal Party. So much so that, when the Social Democrats attempted to introduce an international worker’s culture after acceding to power in the 1930s, there was a strong opposition led by the Radical
Liberals. Eventually in 1953, a common policy platform, the Historic Compromise on Culture was adopted by political parties. It included three elements representative of political parties’ concerns: internationalism for the Social Democrats, Grundtvigianism, and individual liberty for the Radical Liberals. This policy legacy was perpetuated and became norms and ideas which would guide Danish policymakers during instances of policy formulation.

When one looks at the two neighbours’ cultural policy evolution until 1960, it stands as the only point of difference. From the Middle Ages until the Reformation in the mid-16th century, cultural policy was administered by the Catholic Church. After the Reformation, culture fell under the authority of the King and the Court. With the advent of democratic constitutions in the first part of 19th century, it passed under the control of the state and underpinned a mostly nationalist and bourgeois culture. In the decade following World War 2, a new trend, the democratisation of culture or the extension of the high (bourgeois) culture to the masses was promoted as part of the programme of expansion of the welfare state.

At the beginning of the 1960s, a new policy idea of cultural democracy was ushered in. This entailed taking into account everyone’s cultural impulses: regions, urban areas, amateur artists, the working class, and not only the high society as previously. However, there was little will to implement this policy line in Sweden and the attempt to do so in Denmark in the mid-1960s led to controversy and revolt with the so-called Rindalist movement.

Two contingent events then unlocked this situation: the appointments of Olof Palme in Sweden, and Kristen Helveg Petersen in Denmark, as Ministers in charge of Culture in 1968. Both ministers were willing to bring change. They both created governmental commissions in order to formulate a new cultural policy. Nonetheless, while the two policy bills adopted a pluralist concept of culture, only the Swedish Bill, Prop. 1974:28 included immigrants’ cultures. The policy legacy of the Historic Compromise on Culture embodied in Danish policymakers’ frames prevented them from tackling immigrants’ cultures.

Even if the immigrant issue had become public and problematic like in Sweden—where from 1964 to 1968 a virulent debate erupted in newspapers’ columns on multiculturalism at the instigation of the activist David Schwarz, and an important decision maker (gatekeeper) with favourable priors such as Olof Palme had emerged, it is unlikely that multiculturalism would have taken hold.

This is evidenced by the Jytte Hilden episode, the Danish Minister of Culture from 1993 to 1996. She adopted the idea of a multicultural policy but was compelled to shift its formulation “upwards” to the Nordic Cultural Council and “downwards” by using outside experts to avoid the entrenched opposition of the Ministry of Culture’s bureaucracy. After its formulation, her policy programme, *The Politics of Culture*, which included a volume on
multiculturalism, the *Multicultural Denmark*, was rejected and never implemented. Another example is provided by Julius Bomholt, the author of a social democratic worker’s culture in the early 1930s, and a future Minister in charge of Culture, who was compelled to renounce his own work as part of the agreement which paved way to the Historic Compromise on Culture in 1953.

The favourable priors held by Olof Palme led him to foster multiculturalism. He held the perspective that multiculturalism was good for immigrants’ well-being and would facilitate their integration. This is clearly expressed in a section devoted to ‘disadvantaged groups’ in the country’s first National Cultural Policy Bill (Prop.1974:28). These priors stemmed from his personal experience. He had married a woman just for the purpose of helping her to emigrate from Czechoslovakia.

While Palme did not initially bring forth the idea of a multicultural policy in Sweden, he was an important gatekeeper in the sense that as Minister of Culture, then Prime Minister, he had the power to accept or reject the policy. However, because he took up the role of promoting and enforcing multiculturalism despite the opposition of his party, which was anxious that it would undermine the egalitarian principle of the welfare state, he was also an activist gatekeeper.

This shows that, contrary to received ideas, Swedish multiculturalism does not lay in the “freedom of choice” goal of Prop.1975:26, the Bill published in 1975. The concept as it has been employed is a case of concept stretching, which occurs when a concept is used so much and in different settings that it loses its original meaning as it travels. In this case, freedom of choice emanated from general cultural policy in the early 1960s and “travelled” to integration issues to the point of becoming multiculturalism. Even if freedom of choice was indeed the token of Swedish multiculturalism, Prop. 1974:28 rather than Prop. 1975:26 chronologically would take precedence as it is already present in the former.

Rather, as I show, Prop. 1975:26 dealt predominantly with socioeconomic issues and all the non-cultural integration policies drafted between 1960 and 2006 dealt overwhelmingly with socioeconomic issues. The focus on equality and employment was their “golden thread.” Between 1960 and the mid-1980s, policymakers in both countries sought to address practical problems faced by foreign workers in the workplace as illustrated by the 1971 Danish Report on the Situation of Guest Workers and the Swedish Prop. 1975:26.

From the migration crisis of mid-1980s to 2006, despite the controversy surrounding immigration with increased refugees, the two states safeguarded and consolidated foreigners’ rights as illustrated by the Martinez and Tamil Affairs in Denmark and the Deported Egyptians Affair in Sweden. Immigrants’ right to due and fair procedure during expulsion and deportation
orders and *non refoulement*, the expulsion to countries were they could be tortured or face the death penalty, were upheld. They were further strengthened through the creation of migration courts. Full permanent residents were awarded political rights in the form of voting rights in regional and council elections for the first time in Sweden in 1975, and in Denmark in 1981. Yet attempts to expand these rights to national elections failed.

Regarding employment, a new problem emerged around the low labour market participation of immigrants and the sustainability of the welfare state. Activation programmes, based on on-the-job training schemes and Danish or Swedish language learning acquisition, were introduced by the 1999 Danish Integration Act and the 1997 Swedish Bill (prop. 1997/1998:16). After 2000, conscious of the failure of previous programmes to tackle unemployment among immigrants, both governments adopted a New Public Management approach to the problem. Targets were set. For example, the Danish government, through its programme A New Chance for Every One, set the goal of adding 25,000 immigrants to the job market by 2010. Policy evaluation and benchmarks were planned, and incentives to work and anti-discriminatory measures were designed. Lastly, each immigrant was subject to an individual integration plan.

While the Danish right-wing government put pressure on immigrants, the Swedish left-wing government put the onus on employers. Denmark used “sticks” and “carrots” toward immigrants by reducing the basic allowance, “kontanthjælp”, making it conditional to adherence by refugees to their individual integration plans and linking the acquisition of a permanent residence permit to continuous employment for at least two years. They would be rewarded by an early residency permit if they performed well. Sweden instead used “sticks” and “carrots” toward employers. It provided incentives such as tax deductions, wage subsidies for newly-recruited immigrants, and some ‘sticks’ in the form of anti-discriminatory measures to deter employers from discriminatory practices.

Regarding the evolution of their respective cultural integration policies, in accordance to the politics of toleration, Danish policymakers gave prominence to Danish culture and showed a dislike for other cultures. From 1968 to 1993, they ignored immigrants’ cultures even as they adopted a pluralistic concept of culture. After Jytte Hilden’s attempt to introduce multiculturalism, successive governments sought to consolidate the national culture by creating programmes of promotion of Danish language and cultural elements and implementing them. The Radical Liberal Elsebeth Gerner Nielsen organized a national conference on Danish language. The Conservative Brian Mikkelsen introduced the Danish language programme “Sprog på spil” (Language in the Balance), and a Canon of the Danish Culture.
Nonetheless, in accord with the strategy of privatization, they refrained from intervening directly and did not seek the enforced assimilation of colonial times to deprive them of their cultures, as long as these did not pose harm to the majority culture. However, there were variations in the application of this strategy. Radical Liberals drew on the neo-Hederian perspective of _grundtvigianism_ by accepting a modicum of immigrants’ culture in the public sphere, as illustrated by Nielsen’s programme “1+1=3” and her support in favour of the freedom of choice of Muslim women to wear _burqa_. To that effect, the Radical Liberals’ policy amounts to mutual toleration.

By contrast, Conservatives were more willing to enforce the demarcation line between the two cultures and the harm principle. For instance, they cited forced marriages as a justification for increasing the age limit of family reunification between spouses and, following the Cartoons Controversy, upheld the freedom of expression of the resident majority against the accusation of religious blasphemy (psychological harm).

For their part, Swedish cultural policies amounted to a celebration of difference. The first cultural policy _Prop. 1974:28_ drafted in 1974, embodied cultural embeddedness—the idea that immigrants need a vibrant cultural community of their own for their well-being. Immigrants were viewed as a disadvantaged group, in danger of loosing their native languages and of being estranged from the rest of the society. The second Cultural Policy _Prop. 1996/97:3_ adopted in 1996, was not the consequence of a reactive sequence as in Denmark but a follow-up. As it was in its second decade, time had come for an evaluation of the first Cultural Policy, according to the Swedish policy making tradition.

However, the content and the continuation of the policy were influenced by the negative feedback which policymakers received, such as the non-implementation of the previous bill in the 1970s because of the economic crisis, the rise of the far-right and excoriating criticisms against multiculturalism. Rather than changing policy, policymakers reformulated their policy line so as to cast multiculturalism and diversity as a source of benefit for the country and for immigrants. “Diversity” was inserted as a new cultural policy goal. It was described as a source of enrichment for the country’s own cultural dynamism and a benefit in social, economic, democratic and educational terms. Diversity was an effective way of fighting racism, xenophobia and taking advantage of globalization. Exposing ethnic Swedes to immigrants’ cultures would make them more tolerant.

Unlike the previous bill, policymakers also actively sought to implement these provisions. A system of four museums was created to promote world culture. The government monitored regularly the implementation of diversity in cultural public institutions. Following recommendations from cultural workers with an immigration background and with the good
will of then Minister of Culture, Marita Ulvskog, an Agenda for Multiculturalism was drafted for the years 2003-2006. Regional multicultural councillors were appointed in order to oversee the implementation of diversity in public institutions. 2006 was proclaimed a Year of Multiculturalism with celebrations planned throughout the year and in Swedish embassies abroad. By the mid-2000s, their respective policy orientations had become norms in the sense that they were present at almost every level of the society.

ii) Methodological Observations

From a methodological point of view, this study has demonstrated the power of the comparative method or—in the words of the noted comparativist, Seymour Martin Lipset that—“a person who knows only one country knows no countries”.1089 It has been possible to shed light on “aspects which might have gone under the radar,”1090 and to gauge the salience of issues and policies across time and place only by comparing the two countries.

Specifically, it has revealed issues which apply to the two countries (the emphasis on employment and equality) and those which are space bound (multiculturalism in Sweden and assimilation in Denmark); issues which are recurrent (refugees, guest workers, universal human rights, religious blasphemy), and those which are new or “cached.” For instance, while both Swedish Social Democrats and Danish Conservatives formulated activation policies from the year 1990, as a result of divergent political affiliations, the former put the onus on employers while the latter laid responsibility on immigrants.

The study has demonstrated in particular the value of focus comparisons. As predicted by Giovanni Sartori, focus comparisons helped me to detect in the controversy over the “freedom of choice” goal of Prop.1975:26, a case of “concept stretching” and to rule out Galton’s problem by showing that Swedish multiculturalism was not the product of idea diffusion. The breadth and flexible nature of Ragin’s Configurational Comparative Method combined with process tracing proved useful for handling complexity. Particularly, the association of the logic of correlation (across-case analysis) and the logic of process tracing (within-case analysis) provided the tools for capturing all the sequences involved in the process of the birth of multiculturalism in Sweden.

Other methods such as the case study or the experimental method would have been less appropriate. The method of difference which entails that cases be as similar as possible with

different outcomes has shown its continued relevance. Had I used the method of difference, it is unlikely that I would have delivered the same conclusions and theoretical insights.

iii) Theoretical Observations

A) On Policy Change

This research has confirmed some theories, improved others and provided new insights. Concerning the origins of policies, it has, first, demonstrated the currency of ideas. That is, ideas such as (1) frames, priors carried out by agents such as Olof Palme and Jytte Hilden, (2) embedded in institutions (formal and non-formal) such as the Historic Compromise on Culture in Denmark and (3) becoming prevalent as norms at various levels of the society such as the celebration of diversity in Sweden and toleration in Denmark. During agenda setting, despite their adoption of a pluralist view on cultural policy like their Swedish counterparts, Danish policymakers—unlike their Swedish counterparts—avoided multiculturalism and continued to do so even as immigration numbers increased.

Ideas also affected the birth of Swedish multiculturalism more than the structures of decision making. Gatekeeper structures were in essence similar in Denmark (sequential singular) and Sweden (sequential plural). In both cases, a closed gate was the end of a policy. As such, these structures cannot explain the divergent outcomes of White Paper 517 and Prop. 1974:28. Simply, in Sweden, the most influential actor, Olof Palme bore ideas that were favourable to multiculturalism. He exerted his influence during the formulation of the new cultural policy (SOU 1972:66), and its passage in the Riksdag, where party discipline mattered more than party majority.

The crucial question was the behaviour of Social Democrats in the Riksdag. There was concern that they would not support the multicultural provision of the Bill. Earlier, they had opposed state funding for religious schools, fearing that it would undermine the egalitarian principle of the welfare state project. This position was championed by Gunnar and Alvar Myrdal, two iconic figures of Sweden political and academic life, and major architects of its welfare state project. Only a very influential politician, Olof Palme, could reverse this situation. Social Democratic parliamentarians could not contradict their Prime Minister on a stance where he enjoyed the support of the conservative opposition.

This shows, however, that ideas do not float freely. Indeed as argued by Berman, the level of influence and authority of an agent, or the extent to which an idea is institutionalized, plays a crucial support role. The chances that an idea would materialize, depend on the degree of receptiveness of a system—as suggested by Theda Skocpol, or the extent to which it
coincides with interests—as argued by Peter A. Hall. The contrasted agencies of Olof Palme and Jytte Hilden, the Danish Minister of Culture from 1993 to 1996, are revealing in this sense. At different times but driven by similar ideas about multiculturalism, they tried to overcome entrenched opposition in situations where their interests were not involved. However, where Palme succeeded, Hilden failed.

In Sweden, Palme enjoyed the backing of the Conservative opposition. Thus the system was partly receptive. The conservative support for multiculturalism was motivated by the great importance they award to the role of religion in the state, and to the interests of one of their electoral constituents, the export oriented transnational corporations that viewed internationalism as conducive to profit. In Denmark, Hilden was an influential actor in her own right and the wife of the Minister of Finance, Mogens Lykketoft, a close ally of the popular Prime Minister, Poul Nyrup Rasmussen. However, the system was totally closed to her idea. This is evidenced by the antagonism of both her own party and the right-wing opposition.

The Historic Compromise on Culture of 1953 illustrates well the role that institutionalization plays in cementing ideas. The idea of a nationally oriented culture that was rooted in Grundtvig’s ideology was strengthened when it became embedded in a non-formal institution, the policy agreement. As such, at a critical juncture in the 1960s, faced with new competing ideas such as multiculturalism, policymakers and bureaucrats used the Agreement as their roadmap or frames. All these findings lend support to Francis Fukuyama’s claim that “it is impossible to develop any meaningful theory of political development without treating ideas as fundamental causes of why societies differ and follow distinct development paths.”

Second, the research has improved the existing knowledge of the role and types of agents, namely the carrier/gatekeeper category. It has introduced the notion of “activist gatekeeper.” As illustrated by Olof Palme, these are decision makers who stay at the gate and therefore are not policy entrepreneurs who will give up their time and even money to defend a cause. Yet, as Berman’s carriers, they adopt policies and become their main promoter.

Third, the research has shown the continued salience of John W. Kingdon’s streams model on agenda setting. It has confirmed his basic argument about the existence of three streams: politics (contingency), solution, and problem. However, it has also strengthened the arguments of his critics about the functioning of these streams. The examination of the birth of Swedish multiculturalism has suggested that the three streams are not exclusively independent—as stated by Kingdon—but that various combinations can lead to agenda setting.

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In the case of Sweden, the problem stream was independent. Politicization stopped when Olof Palme became Minister of Culture (politics stream) and began the formulation of the new cultural policy (policy stream). Thus, only the politics and the solution streams concurred.

In Denmark, there was no politicization but there was a change in the policy stream and the availability of a policy framework that could have led to a multicultural policy if, for example, Danish policymakers had to learn from their Swedish counterparts or had positive priors towards multiculturalism. Indeed, Danish policymakers were aware of the adoption of a multicultural policy in Sweden and had previously undertaken a fact-finding mission.

Fourth, the study provides numerous insights into policy practices and behaviours in Sweden and Denmark. Unlike most Danish ministries, policy making in the Danish Ministry of Culture is highly personal and its bureaucracy functions as a watchdog in charge of policy continuity and “policy purity”. These are particularly interesting avenues of research. The study has also shown that policy change can emanate from a policy making habitus as the almost ritualistic revision of every policy bill at the end of its second decade. Yet the content of these policies is still affected by mechanisms of path dependence. While increasing returns is the most common mechanism of path dependence in economics, this study suggests a high prevalence of negative feedback mechanisms in integration studies. All the integration policies that I studied were affected by this mechanism.

B) On Policy Continuity

Regarding the nature of Swedish and Danish cultural integration policies, it has emerged that mapping out assimilation and multiculturalism in theoretical terms is as important as understanding the processes which underpin policy change and continuity. These processes are even interrelated inasmuch as one must first know and define clearly the object of study. These two concepts are pluralistic in nature and needed to be “dissected” accordingly such as toleration and the celebration of difference. As Charlotte Hamburger wrote about Danish policies, “it is not enough to say that Danish integration policy is assimilation, one must know which kind of policy it is”.

Regarding policy implementation, this study has shown the salience of a functionalist approach beyond Pressman’s and Wildavsky’s ‘top-down’ approach and Lipsky’s ‘bottom-up’ approach in regard to the two countries’ socioeconomic integration policies. Rather than following a specific implementation design or incorporation regime, policymakers tried various strategies in order to achieve success. Some included the incorporation models put forth by Soysal, others did not. Sometimes policies were not implemented at all. In both cases, governments sought above all to execute the regalian functions of the state; namely accumulation and fairness.

Yet in the cultural integration domain, this study has also validated Pressman’s and Wildavsky’s approach about the ‘top-down’ approach to implementation of decision makers and their failure to incorporate details during policy making episodes. For example, the refusal of the Swedish government and parliamentarians, with the exception of Communists, to include concrete measures in favour of immigrants’ cultures in the 1974 Cultural Policy Bill. On the other hand, it has shown evidence of Lipsky’s claim that policy execution can depend on street level bureaucrats as evidenced by the rejection of Jytte Hilden’s cultural policy by the Danish Ministry of Culture’s bureaucrats. However, throughout the period of study, these policies were not implemented according to a specific regime of incorporation or pattern.

Interestingly, the study has revealed that political affiliations still have a lingering and somehow pervasive effect in situations where a non-ideological consensus prevails. This was replicated in different contexts, both within and across the two countries. As previously stated, while both governments enforced measures for increasing the labour market integration of immigrants after the year 2000, the Danish right-wing coalition put pressure on immigrants (prospective employees). By contrast, the Swedish Social Democrats and other coalition members put the onus on employers. In Denmark, despite a similar cultural policy orientation—toleration—the more culturally liberal Radical Liberals applied mutual toleration while the Conservative Minister, Brian Mikkelsen, espoused minimal toleration.

Although there is little knowledge on just how much integration and immigration policies influence each other, I have found no meaningful correlation or causal factor between the two. Danish immigration policy was fairly generous until the mid-1980s. It became restrictive afterwards but it is not until after the accession to power of the VKO coalition that it became one of the most restrictive in Europe. Meanwhile, Swedish governments maintained a multicultural orientation policy even during periods of restriction, namely in the early 1990s during the mass arrival of refugees from Yugoslavia. Thus, the relationship between immigration and integration may not be causal. While immigration increases cultural diversity, it does not determine the kind of cultural integration policy a state will choose.
C) On Socioeconomic and Political Integration Policies

Lastly, in regard to socioeconomic and political integration issues, the review of Denmark’s and Sweden’s policy developments from 1850 to 2006 has shown that states seek avidly to “earn” from immigrants. As argued by Christina Boswell, they seek primarily to protect their main interests, accumulation and security. The state’s other regalian functions such as fairness and legitimacy are also salient. However, without the watchful eye of courts and activists, states would “trample” immigrants’ civil rights for the purpose of ensuring its security, restricting immigration or simply showing that it still matters despite the corroding effects of globalization.1093

The study has demonstrated that immigrants obtained social rights before civil rights. While immigrants in Sweden and Denmark have been awarded the right to vote in local elections and to pursue political activities related to their countries of origin,1094 full political rights are only available to them after naturalization. Both countries applied the same principle of citizenship: 

iv) Epistemological Observations

On an epistemological level, this work has reiterated the need of intertwining complementary theoretical perspectives in the study of integration policy. It has proven that research on integration can inform research on public policy and political science in general, and vice-versa. All the theories used in the course of this research, except for those put forth by Erik Bleich, originated outside the field of I & I. However, the new insights which these theories delivered from the examination of the Danish and Swedish cases can themselves illuminate inquiries in other fields of political science. As Erik Bleich writes:

1094 Foreigners were forbidden to carry out political activities linked to their countries of origin at the beginning of the 20th century. See Chapter Three and the exemple of Alexandra Kollontay in Sweden.
reviewers responsible for taking the pulse of the political science discipline do not often look to immigration and integration specialists for portable insights that might inform their studies of political economy, the welfare state, policy making, political mobilization, or other arenas. At an even broader level, recent overviews of comparative politics and of political science as a whole contain almost no citations of the I & I literature— even in summaries of topics such as the state, culture, and identity, which are among the core concerns of immigration and integration scholarship.\footnote{Bleich, Erik (2008) “Immigration and Integration Studies in Western Europe and the United States: The Road Less Traveled and a Path Ahead”, World Politics, Vol. 60, No 3, p. 510. Bennett, Andrew and Elman, Colin (2006) “Complex Causal Relations and Case Study Methods”, p. 254. See also Dessler, David (2003) “Explanation and Scientific Progress” in Elman, Colin and Elman, Miriam, Fendius (eds.) International Relations Theory: Appraising the Field, Cambridge: MIT Press, pp. 381-404.}

Then this work has underscored the need for scholars to talk across disciplines. This is evidenced by the fact that scholars of migration in both countries remained impervious to cultural policy for such a long time, while cultural policy experts paid little attention to the ethnocultural diversity aspect of this policy. It was not a lack of awareness per se of these policy documents, but the absence of a pluralist and flexible perspective. As Bennett and Elman explain:


Also, students of public policy need to be cautious about the way policies are packaged by policymakers. It is likely that many authors misinterpreted the freedom of choice goal of Prop. 1975:26 because of its supposedly “giveaway” title: “Policy Guidelines for Integration.” However, like in a chess game, nothing is self-evident. While this may be a useful indication as to the content of the policy, all policies do not come with such a banner and all banners do not reflect the true content of their policies. Quite often, unpopular policies, politicians’ pet projects or “earmarks”—to use a common parlance in U.S. politics-speak—are “sneaked” into policy packages.

In other circumstances, some of these policies are simply overshadowed by others because they bear less importance in the eyes of politicians and of public opinion, or they have pressure groups whose support is not influential enough. Some policies do not become fully-fledged policy bills, yet they are implemented; others are passed with pomp by a parliament yet fail to be properly implemented, as illustrated by the Sweden’s first cultural policy bill, Prop. 1974:28.
Scholars should equally pay attention to the way political actors use concepts such as integration, national minority and culture. The meanings politicians assign to them are *stricto sensus* often different from the understanding researchers have of them. Throughout the period of study, policymakers, activists, and journalists assigned their own meaning to these concepts, as illustrated by Prop.1975:26, Sweden’s first socioeconomic integration bill.

While lawmakers effectively distinguished between immigrants and historic minorities such as Saami, Jews, Finnish-speaking Tornedalians, Swedish-Finns and Roma, they postulated that once immigrants have resided in the country for a number of years, they joined the rank of national minorities as opposed to landed immigrants. In this scenario, patterned after the famed Norwegian anthropologist, Fredrik Barth’s theory, groups’ identities were considered as fluid and the “boundary” itself was the length of residency on the territory and not bounded cultural entities.¹⁰⁹⁷

Prop. 1975:26 stated that:

The groups in Sweden which can be considered as linguistic or ethnic minorities are, on the one hand - apart from the Saami and Finnish-speaking Tornedalians - formed by immigrants and their children. Many members of these minority groups have passed the acute adjustment difficulties related to immigration and are socially well integrated into Swedish society. However, they often perceive their cultural and linguistic environment as different from that of the resident majority. For many newly arrived immigrants, on the other hand, the social adjustment problems have more important consequences. To distinguish between immigration and minority issues would not be a good answer to the current situation in Sweden. For this reason, IU treated immigrant and minority issues as parts of one and same problem area. IU has chosen to use the concept of linguistic minorities for both newly immigrated persons and established minorities.¹⁰⁹⁸

While regional parliaments have been established for Saami, Inuuits, and Greenlanders and special status has been awarded to historic minorities and their languages, this is unheard of for immigrants. Thus, even if both groups present a similar problem - how to accommodate ethnocultural difference - and policymakers think that their solutions would be similar, actually this is not always the same, as illustrated by the outcome of the bill. It mainly examined issues relating to immigrants at the expense of national minorities. In some cases, regarding the concepts of “culture” and “integration” for instance, policymakers in both countries did not formulate a specific definition but took a hands-on approach.

Finally, scholars should give consideration to the way they use these concepts themselves in order to avoid the confusion which has surrounded terms such as

“multiculturalism”, “assimilation”, “integration”, and “minority,” and the contradictions which have beset many studies. As mentioned previously, while Kymlicka’s work focuses on historic minorities, Iris Marion Young’s categorizations include women, religious groups, and non-heteronormative groups. As Andrew Vincent notes pointedly:

such accounts of groups that do exist remain inconclusive, confusing and inchoate. When for example, Young discusses groups (qua multiculturalism), she is neither thinking of legal associations, nor the multifarious types of ‘voluntary’ groups - many of which have distinct and intelligible ‘cultures’. She is also not focused on ethnic or national groups. She is only interested in one niche or dimension of the abstruse category - ‘involuntary affinity groups.’ Similarly, when Kymlicka discusses the concept of multicultural groups, he has, again something quite specific in mind. He focuses on immigrant and indigenous groups - largely territorially rooted minorities, each with an ‘essential culture’... suffice it to say that both theorists rule out an enormous range of groups from multicultural discussion. Thus the nature of groups within contemporary multiculturalism remains vague and confusing. 1099

Concretely, scholars need to indulge in exercises of conceptualization and operationalization in relation to their object of study. This may entail—as in the present study—drawing upon methodological and theoretical knowledge. Useful methodological instruments, such as Giovanni Sartori’s “empirical universals,” are available and could even be improved. As this study has demonstrated, even a concept such as “policy,” which appears less problematic, requires such exercise. Defining policy as “a more general notion than a decision and... a predisposition to respond in a specific way” 1100 is certainly insufficient for capturing the complex processes that modern public policies have become. Page’s definition, that I use in the course of the study and which distinguishes between policy intentions (ideas and principles) and actions (measures and practices), has proven to be more versatile and fitting. 1101 Indeed, as exemplified by the multicultural provision of the 1974 Swedish cultural policy bill which was not implemented until the 1990s, some policies remain at the stage of policy intentions. As the Danish Ministry of Culture’ bureaucratic phenomenon illustrates, policy practices, particularly policy behaviours which students of migration often neglect, can contribute eloquently to the understanding of an issue.

Non-policy, which Bachrach, Baratz 1102 and Lukes define in common as the refusal on the part of politicians to act on an issue, matters as well. Danish policymakers, as shown in

1101 See Chapter Two for the whole definition.
Chapter Six, conspicuously avoided dealing with cultural integration issues while tackling general cultural policy, before the early 1990s. Lastly, it has become imperative to specifically “sort out” integration policies into distinctive sectors (cultural, socioeconomic, political, and so on) even though they may overlap in some contexts. The failure to do so would have been methodologically and theoretically consequential in this study.
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