

Understanding Convergence in Danish and Swedish Official Immigrant Integration Policies (1960-2006)

Most comparative studies of immigration and integration policies seek to explain causality in policy divergence. Hardly, do they try to understand the processes that underpin convergence. This article seeks to narrow this gap by studying the immigrant integration policies of Denmark and Sweden, two countries with strong similarities and a close tradition of policy cooperation but whose policies have been characterised as antipodean. Applying theories of policy convergence adapted from environmental policy research, it shows that since 1960, their official integration policies have been more convergent than assumed; emphasizing employment issues and dealing only marginally with issues concerning multiculturalism and assimilation. Until the migration crisis in the 1980s, both countries' policymakers legislated hesitantly but Sweden was a frontrunner. After this period of time, they legislated actively with Denmark making up for lost ground and even providing inspiration. Still yet, their regimes of immigrant incorporation followed opposite directions.

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Introduction

In the late 1960s, as non-Nordic immigrants became a major component of their immigration streams, Sweden and Denmark started to legislate on issues concerning the integration of immigrants. In 1975, after seven years of debates and consultations, Sweden passed its first official integration policy Bill, Prop. 1975: 26 Guidelines for Integration and Minority Policy that has retained attention as the country's "token multicultural policy" through its Freedom

of Choice Goal. However, debate and controversy erupted in the following years on the multicultural scope of the Goal. As for Denmark, its policy has been painted in various shades of nationalism¹, characterized as a mild form of multiculturalism², underpinned by socioeconomic and cultural equality³ or toleration⁴. Today, Sweden is often referred as the “flagship” of multiculturalism⁵ and Denmark as the stronghold of assimilation in the West⁶ despite their long tradition of policy coordination within Nordic institutions of cooperation.

A handful of researchers have investigated convergence in integration policy in the Scandinavian context. Using various methods and with Sweden often as the standard case, they have come to broadly similar conclusions. According to Jørgensen (2006), Denmark and Swedish integration policies have focused on employment and housing issues.⁷ Similarly, Valenta and Bunar (2010) found that both Sweden and Norway laid focus on employment issues and housing. Breidahl (2012) also claims a greater convergence than assumed and a common focus on employment issues in her comparative study of Norway, Sweden and Denmark’s immigrant integration policies between 1970 and 2011. The authors also note the presence of multicultural policy provisions but comment on them to a less extent than socioeconomic issues.

This article complements the above studies by investigating the relative importance of these multiculturalism or assimilation provisions as well as the controversy about the Freedom of Choice goal. It shows that the Freedom of Choice represented a multicultural vision but that multicultural policy provisions were present in smaller proportions than socioeconomic or

¹ Holm 2006, Mouritsen and Olsen, *Denmark between liberalism and nationalism*.

² Roth, *Om mångkulturalismens kritiker*.

³ Hvenegård-Lassen, *På lige fod*.

⁴ Tawat, *Danish and Swedish Immigrant Integration*.

⁵ Borevi, *Sweden: The Flagship*.

⁶ Hedetoft, Petersson and Sturfelt, *Bortom Stereotyperna*.

⁷ Jørgensen. *Bortom stereotyperna?*

political issues in these official policies. They referred back to state cultural policies which were published earlier and include more multicultural policy provisions. In this vein, the Freedom of Choice Goal can be best described as the “tip of the iceberg”.

Immigrant Integration and Policymaking Theory

Broadly speaking, policy is what a government wants to do or not to do. “A more general notion than a decision and... a predisposition to respond in a specific way”⁸. Specifically, Page (2006) distinguishes two kinds 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 qualifications for the labour market. 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.⁹ The study focuses on policy making particularly policy formulation or the identification of contents. It eschews agenda-setting, the process by which an issue climb on policymakers’ tables among a myriad of competing ones or decision making and implementation processes are studied. Bredahl focused squarely activation policies in a comparative analysis of Sweden, Norwegian and Danish policies between 1970 and 2011. She focused squarely

⁸ Hague et al. *Comparative Government and Politics*, 255-256

⁹ Page *The Origins of Policy*, 210-11.

Immigrant integration, in contrast to immigration control (access to a country) relates to the processes that immigrants undergo once they settle into a country. The literature on immigrant integration policy is transversed by several approaches. The most prevalent of which is the multiculturalism/assimilation dichotomy.¹⁰ Broadly defined, multiculturalism designates policies that give recognition to immigrants' cultures.¹¹ Assimilation refers to policies that encourage immigrants to abandon or at least keep their cultural beliefs and practices in the private sphere¹². However, both perspectives exclude immigrants' cultural practices or beliefs that they find unacceptable or harmful to the majority such as honour crimes, forced marriages and female genital mutilation¹³.

The second approach, the citizenship thesis, is embodied by two main perspectives. On the one hand, there is Brubaker's citizenship tradition. It emphasizes the importance of the nation-state and collective identity. Brubaker reasoned that the mode of citizenship acquisition explains the behaviour of a government toward its immigrants.¹⁴ He considered *jus sanguinis* (citizenship acquisition by descent) as the core principle of the ethnocentric model represented by Germany and *jus soli* (citizenship acquisition by birth on the territory) as that of civic nationalism exemplified by France. The rates and conditions of naturalization set by each country, he claimed, only came to "reinforce this difference".¹⁵ On the other hand, there is Soysal's postnational citizenship.¹⁶ It posits that international human rights instruments have created a postnational citizenship regime in which immigrants' rights and claims rival

¹⁰ Hartmann and Gerteis, *Mapping Multiculturalism*.

¹¹ Parekh, *Rethinking Multiculturalism*; Young, *Justice and the Politics of Difference*; Taylor, *The Politics of Recognition*.

¹² Miller, *On Nationality*.

¹³ Tawat, *Two Tales of Viking*.

¹⁴ Brubaker, *Citizenship and Nationhood*.

¹⁵ Ibid. 81 and 119

¹⁶ Soysal *Limits of Citizenship* 1994

those bestowed upon citizens, creating a disconnection between the nation-state and citizenship.¹⁷

While useful, the multiculturalism/assimilation and citizenship tradition approaches have been criticized for their ‘catch-all’ nature¹⁸. They have been said to conflate policies towards immigrants across time and domains, immigrants’ own strategies of acculturation¹⁹ and ethnic diversity in daily life.²⁰ This “encompassing reflex”, Bertossi and Duyvendak write “cannot be sustained without comparative empirical research on immigrant integration and citizenship in Western European countries incurring considerable problems”²¹

In an effort of synthesization, Entzinger²² suggested that one differentiates among integration policy domains and considers each domain as an independent variable although one may still find what Favell²³ called “traces” of other domains therein (see also Ager and Strand²⁴). The socioeconomic domain relates to social rights and employment. The political domain refers to political participation namely the right to vote and citizenship acquisition but also incorporation regimes or the institutional design put in place to help immigrants integrate. Soysal²⁵ The cultural domain is concerned with state policies towards immigrants’ cultural practices and beliefs namely multiculturalism and assimilation.

¹⁷ Ibid: 23

¹⁸ Hartmann and Gerteis, *Mapping Multiculturalism*, 19.

¹⁹ Berry *Culture and Equality*.

²⁰ Runblom, *Swedish Multiculturalism*, 624.

²¹ Bertossi and Duyvendak, *National Models of Immigrants*, 238.

²² Entzinger, *The Dynamics of Integration Policies*, 101-106.

²³ Favell 2001.

²⁴ Ager and Strand 2004

²⁵ Soysal, *Limits of Citizenship*.

A more quantitative and increasingly used approach is the Queen's University Index of Multiculturalism Policies in Contemporary Democracies.²⁶ It is based on the following seven variables:

1. the adoption of multiculturalism in school curriculum;
2. the inclusion of ethnic representation/sensitivity in the mandate of public media or media licensing;
3. exemptions from dress-codes, Sunday-closing legislation etc;
4. allowing dual citizenship;
5. the funding of ethnic group organizations to support cultural activities;
6. the funding of bilingual education or mother-tongue instruction;
7. affirmative action for disadvantaged immigrant groups.

While more basic than other conceptualizations, Queen's Index and Entzinger-Favell conceptualization lend themselves better to a policymaking-focused study like this because of their less abstract nature and more empirical bent.

Qualitative Content Analysis

The methodological perspective of the study is qualitative content analysis. It helps to establish meaning from text data through coding and identification of thematic patterns. Hsieh and Shannon²⁷ distinguish three main approaches: conventional, directed and summative. "In conventional content analysis", they write, "coding categories are derived directly from the text data. With a directed approach, analysis starts with a theory or relevant research findings as guidance for initial codes. A summative content analysis involves counting and comparisons, usually of keywords or content, followed by the interpretation of the underlying context."²⁸

The directed approach is more relevant to this study because it is theory-laden and foregoes counting to a significant extent. Categories are derived from Entzinger and Favell's

²⁶Queen's University Index of Multiculturalism Policies

²⁷Hsieh and Shannon, *Three Approaches to Qualitative Content Analysis*.

²⁸ *Ibid.*, 1277

conceptualizations (socio-economic integration, cultural integration, political integration, and traces to (1) make sense of the contents of the countries' official integration policies, (2) identify patterns within case and (3) compare these patterns across the cases. Furthermore, we use the seven variables of the Queen's Index to detect multicultural provisions. The article is structured around policy sequences. Each sequence is foreshadowed by the context at that period of time. To make comparison easy, countries are studied successively within each sequence.

I. 1960s-1970s: The Primacy of Workplace Issues and an Early Swedish Lead

The 1975 Swedish Bill 1975: 26, Guidelines on the Integration of Immigrants and National Minorities

From the 1960s to the mid-1980s, policymaking in both countries resembled a slow creep but Sweden was a forerunner. During this period of time, both countries' policies focused on guest workers' problems in the workplace. In the early 1960s, as the Swedish economy enjoyed a period of unprecedented economic growth fuelled by reconstruction in post-war Europe, guest workers were recruited in masse from former Yugoslavia, Turkey and South Europe to fill persistent shortages in the industries. At first, the government was reluctant to take action. But as the Swedish Trade Union Confederation (LO) and the Swedish Adult Education Association, *Studieförbundet* helped to launch languages courses and Immigrant Bureaus, *Invandrarbyråerna*²⁹ and a media controversy on immigrants' conditions and multiculturalism begun the year before by David Schwarz, an immigrant activist of Jewish-Austrian background, raged³⁰, the Government set up the Taskforce on Integration,

²⁹ Sarstrand, *De första invandrarbyråerna*, 50-64.

³⁰ Tawat, *The Birth of Sweden 's*.

Arbestgruppen för Invandrafrågor. But the work of the Taskforce was criticized by Schwarz and his peers for being a botched work for assimilation and prioritizing employers' needs at immigrants' expenses.³¹

In May 1968, the government created a fully-fledged commission to investigate the general situation of immigrants and national minorities, Immigrant Enquiry, *Invandrarutredning*, (IU). In 1971, IU produced a first report SOU 1971: 51 that proposed the introduction of home language instruction for immigrant children alongside Swedish language seen as leading to improved proficiency in Swedish, important for the development of children's personality and the preservation of their cultural heritage.³² A second report, SOU 1972: 83, published in 1972, dealt with translation services and the Nordic Convention on Languages. A third report, SOU 1974: 69 issued in 1974 included main findings and formed the basis of Prop.1975: 26 Guidelines for an Integration and Minority Policy adopted by the Riksdag, the Swedish parliament on 22 February 1975.

The Bill formulated three overarching principles: *Equality, Freedom of Choice and Cooperation*. Equality meant that immigrants should have the same opportunities, rights and obligations.³³ Freedom of Choice entailed that immigrants have the possibility of choosing to what extent they want to preserve and develop their cultures and languages.³⁴ Cooperation denoted mutual tolerance and solidarity between immigrants, national minorities and ethnic Swedes.³⁵

In Denmark, immigration was similarly constituted of guestworkers but occurred later due to a delayed postwar economic boom. However, by 1964, labour shortages had become acute

³¹ Hansen, *Jämlikhet och valfrihet*, 135-136.

³² Skolverket Rapport 228.

³³ Prop. 1975: 26: 15.

³⁴ Ibid.

³⁵ Ibid.

and politicians were debating publicly if foreign labour should be recruited.³⁶ The first official guestworkers started to arrive in 1967, mostly from Turkey, the former Yugoslavia and Pakistan. They were joined by de facto immigrants who could not gain admission in neighbouring Sweden and Germany because of visa restrictions induced by the economic slowdown.³⁷ In 1969, the Ministry of Labour set up a commission to enquire into guestworkers' situation and in May 1970 to investigate the labour market needs for foreign workers. The following year, the Commission published its conclusions, Report No 589 on the Situation of Guestworkers.³⁸

The Bill's policy lines were specific and following Sabatier and Mazmanian's theoretical perspective³⁹ ranked by order of priority and importance: workplace injuries and unionization, poor housing conditions, access to welfare services, state child support, retirement pension, voluntary health checks, bilingual/home language teaching and local councils' support for immigrant organizations with a national presence and at least 3000 registered members.⁴⁰

The onus put on workplace injuries and unionization indicates not only the primacy of employment questions on social and civil rights but equally shows that these were the main problems encountered by immigrants. Likewise, they reflect the configuration of power and interest that was in favour of trade unions. Fearing that employers may use guestworkers to depress wages and undermine working conditions, the Trade Union Confederation, LO had accepted labor immigration upon the condition that unionization, and equitable pay and

³⁶ Jensen 2001: 33.

³⁷ Andersen 1979: 13 and 33.

³⁸ Betænkning nr. 589.

³⁹ Sabatier and Mazmanian, *Effective Policy Implementation*, 10.

⁴⁰ Prop. 1975: 26, 21-22.

working conditions be provided to these guestworkers. It had also obtained the right to request the stop of this immigration if conditions become unfavourable for native workers.⁴¹

While the report was not elevated to a fully-fledged policy like the Swedish national policy of 1975, it was no less important judged by its wide application by the government. However, like in Sweden, as economic growth slowed down and unemployment start to rise, Sweden and Denmark stopped labour immigration respectively in 1972 and 1973. Most guestworkers stayed and reunified with their families thanks to tolerant legislation and court injunctions. Fleeing dictatorships in South America and civil war in Vietnam, the number of refugees grew exponentially. Soon, they will become the main stream of immigration.

II. 1980s-1990s: Job Activation Measures, Anti-Discrimination Policies and the Danish Catch-up

A) The 1998 Danish Integration Act and its Integration Program

In the mid-1980s, as the so-called “ migration crisis” broke out, governments in both countries announced new policy intentions. Their policy principle was the promotion of equality between natives and immigrants and their policy line, raising employment among immigrants. These were sustained by two specific measures an “integration” programme and the upgrading of their Swedish or Danish language skills. Policymaking became a slopery slope and Denmark caught up with Sweden. Unlike the 2015 European refugee crisis that related to immigration control, this was above all a crisis of integration.⁴² Immigrants’ access

⁴¹ Johansson, *Så gör vi inte här*, 122-123.

⁴² Following the French National Front’s playbook, radical right parties, the Danish People’s Party in Denmark and New Democracy in Sweden began to incite the public against immigration and multiculturalism. At the European level, the publication of *The Satanic Verses* by Indian author Salman Rushdie in 1988 led to a bitter confrontation between advocates of freedom of expression and opponents of blasphemy. In 1989, the controversial “foulard affair” in which three French Muslim schoolgirls wearing headscarves were refused

to the labour market in general was found to have decreased.⁴³ Both governments also struggled with the integration of refugees from the former Yugoslavia and Kosovo who arrived respectively in the early and late 1990s. Many of these refugees were traumatised, lacked national language skills, cultural knowledge of the host country and marketable professional skills. In Sweden, the deadly rampage targeting visible minorities carried out in 1992 by John Aussonius, a serial killer shocked the public opinion and ignited a national debate on integration. In Denmark, the Martinez Affair 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 set the agenda-setting process in motion. The arbitrariness and extra-judicial nature of the decision caused public outcry, after which the Minister was compelled to create a taskforce on immigration and integration.

The task force's report *Documentation on Integration*, "Dokumentation om indvandrere, særskrift nr. 3"⁴⁴ formed the basis of a first report introduced by the Social Democratic government in the Danish 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 immigrants⁴⁵: 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.⁴⁶ As the consequence of the

access to school by an Afro-Caribbean headmaster on the grounds of "laïcité" or secularism stirred up controversial debates on multiculturalism.

⁴³ Bevelander, *Immigrant Employment Integration*. Prop. 1996/1997: 3, 22-23.

⁴⁴ Hammer, Ole, *Regler og bestemmelser om indvandrere: Gennemgang af lovgivning, som særligt tager sigte på udenlandske statsborgere uden for Norden og EF*, København: Mellempøkeligt Samvirke, 2006, p. 6.

⁴⁵ A particular upswing occurred between 1982 and 1984 (2674 refugees) Tema Nord 1994: 515 *Invandring och Invandrare i de Nordiska Länderna*, Nordisk Ministersrådet.

⁴⁶ 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, Its work had been marred by deep divisions between restrictionists and nonrestrictionists. In

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 1994.⁷⁰ In May 1997, a commission of enquiry on integration “Integrationsbetænkningen” was launched and it drafted its first policy in the course of the same year. The Danish Social Democratic government passed its first comprehensive integration policy, Lov nr. 474 on 1 July 1998⁴⁷. Having formulated only a policy report so far, the government exuded pride about what it termed the first “integration law” in the world – calling it more than a policy bill. The Act specified as exhaustively as possible the rules for its application. 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.

It replaced the 18 month-period of assistance provided by the Danish Refugee Council and funded by the government since 1978 and restricted to refugees and their family members above 18 and fewer than 25 years of age. Its 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 in Danish language “danskundervisning” and society “samfundsforståelse.” An activation component

1985 many of the Act’s generous provisions were rescinded. Redegørelse af 12/4 83 om indvandrerpolitiken.

⁴⁷ Ejrnaes 2001; Holm, *Folketinget og udlændingepolitikken*, 178.

“aktivering” was also included. Thus, refugees who refused to take part in the integration programme, under normal conditions⁴⁸ 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).⁴⁹ 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 led to the enacting of a fully-fledged Act on Danish language teaching alongside the Integration Act on 1 January 1999.

B) The Swedish Bills Prop. 1985/86:98 on Immigrant Policy and Prop. 1997/1998:16 From Immigrant Policy to Integration Policy

The Swedish government tasked the Commission of Integration, *Invandrars politik Kommission* (IPOK), with the preparation of a blueprint for new immigration and integration policies. In its conclusions, SOU 1984:58, *Immigrants and Minority Policy: Final Report*, the Commission 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.⁵⁰ The report was consolidated into the second Integration Policy, Prop. 1985/86:98 *About Integration*

⁴⁸ 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.

⁴⁹ Undervisningsministeriet Uddannelsesstyrelsen (2000) “Danskundervisning og aktivering i samspil” Håndbogsserie No 4. 144

⁵⁰ This report summed up the recommendations of the first report in the series, *Background (Bakgrund)*, SOU 1982:49) published in 1982 and the second report, *Proposal (Förslag)*, SOU 1983:29) released in 1983.

Policy released on 13 February 1986. The Bill kept the same policy objectives as the 1975 Integration Policy.⁵¹ Its central plank was a new law against ethnic discrimination and an ombudsman against ethnic discrimination.

In the early 1990s, following a tradition that requires policies to be re-examined after every decade, the Swedish parliament appointed a Committee to investigate the issue anew.⁵² In its first report, *Work for all Immigrants*⁵³ issued in July 1995, 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, *Integration Allowance: Three Alternatives*,⁵⁴ to study the sustainability of an integration allowance and to set up a commission of enquiry into immigrants' labour market participation. This task force report, *Equal Opportunity*⁵⁵ and the findings of all these documents were gathered into what became the third official integration policy, Prop. 1997/1998: 16: Sweden, the Future and Diversity - From Immigrant Policy to Integration Policy.⁵⁶

The change from the term immigrant policy "Invandrapolitik" to integration policy "Integrationspolitik" was meant to denote the active dimension of the policy.⁵⁷ The most important measure herein 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

⁵¹ Prop. 1985/86:98, 1.

⁵² Kommitt Dir: 1994:130.

⁵³ SOU 1995:76 *Arbete till invandrare*

⁵⁴ Ds 1997:47: *Promemoriam introduktionsersättning - tre alternativ*",

⁵⁵ SOU 1997:82 *Lika möjligheter*.

⁵⁶ This report summed up the recommendations of the first report in the series, *Background* (Bakgrund, SOU 1982:49) published in 1982 and the second report, *Proposal* (Förslag, SOU 1983:29) released in 1983. Its recommendations about immigration gave way to a new Alien Act mirroring the liberal 1983 Act of Denmark. The functions of the organisation were detailed in a new law against ethnic discrimination, Lag 1994:134.

⁵⁷ Prop. 1998/97: 16.

allowance amounting to SEK 5,000 (about USD 4500) per month from the state, a means-tested allowance and a tax deductible additional amount. 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 and Danish policies, the provision of equal rights, "lika rättigheter", irrespective of ethnic and cultural background was set as a main goal⁵⁸ 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.⁵⁹

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 Work and Making a Living, "*Arbete och försörjning*" the government acknowledged the influence of both environmental 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 the goal of halving unemployment among immigrants (those who have at least one parent who is immigrant, especially non-Western immigrants) by year 2000.⁶⁰ 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

⁵⁸ Prop. 1998/97: 16, p. 1.

⁵⁹ Ibid.

⁶⁰ Ibid., 48.

programme of 10,000 IT specialists. The maximum period of professional internship “arbetsplatsintroduktion” (API) whose 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 selfemployment 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.

Unlike in 1975 when guest workers’ practical problems were at the top of the agenda, and like in Denmark, the second policy area singled out was not housing but language and education, which were now seen as important instruments in achieving equality of opportunity and in that sense still related to work. 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.⁶¹ 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.⁶²

⁶¹ Ibid., 8.

⁶² 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.

III. Year 2000s: Shock Therapy against Joblessness and some Danish Inspiration

A) Pressure on Employers: the Swedish “Step In Job” Programme

In the 2000s, contemplating policy failure, governments in both countries devised stronger strategies. In Sweden, the government disclosed in its mid-way report, Integration Policy for the 21st Century that the employment gap between immigrants and natives remained large.⁶³

In 2002, a year after coming to power, the Danish centre-right coalition formed by the Liberals and Conservatives with the anti-immigration Danish People’s Party as a support party presented a White Paper entitled On the Path toward a New Integration Policy. The Paper stated that 60,000 persons of working age with an immigrant background were missing from the labour market⁶⁴.

As a consequence, both governments adopted stringent measures including benchmarking, monitoring, evaluation. The Swedish plan, Step In Job, *Insteggsjob* encouraged employers to hire immigrants who could gain workplace experience while learning Swedish. The state vouched to pay 75 per cent of the wage or a maximum of SEK 750 (about USD 70) per day for immigrants who had received a resident permit within 36 months if an employer recruited them for a period of six months each (a maximum of twenty-four months in total), and the immigrant was making satisfactory progress in a Swedish Language Course for Immigrants (SFI). At the end of 2006, the government was considering additional measures of the same kind.⁶⁵

⁶³ Ds 2001/02: 129.

⁶⁴ Regeringen 2002: 1.

⁶⁵ Prop. 2006/07: 89.

B) Pressure on Immigrants: The 2005 Danish Integration Plan, “A New Chance for Every One”.

The Danish plan, A New Chance for Every One, was enacted on 17 June 2005 with support from the Social Democratic opposition, trade unions, local councils and employers’ representatives. It vouched to add 25, 000 immigrants to the job market by 2010. It sought to make employment more attractive than welfare benefits by reducing the Integration Allowance, “Kontanthjælp” and cancelling it altogether if an able-bodied refugee desisted. The acquisition of an unlimited permanent residency permit was tied to continuous employment for a minimum period of two years. Immigrants who had steady employment and had completed their language programmes would be rewarded by the early granting of permanent residency⁶⁶.

The plan created a partnership agreement based on the provision of on-the-job training opportunities by employers to long-term unemployed immigrant (90 % of the last three years) and job-seeking assistance by local councils in exchange of state’s subsidies. A programme was created to prevent “ghettoization” by giving councils the power to deny housing to welfare recipients in precarious areas and overseeing various collaborative projects to prevent crime and promote tutoring and volunteering. An Integration Service with five regional integration councilors was also created to monitor progress in the local councils and help spread good practice.

Sweden and Denmark also emphasized the fight against discrimination seen as undermining democracy, an obstacle to immigrants’ access to the job market and a EU imperative. However, unlike employment issues, they shifted anti-discrimination issues to other policy arenas. Yet Swedish policymakers acted more decisively than their Danish counterparts. The

⁶⁶ Ministeriet for Flytninge, Indvandrere og Integration 2005: 2.

Swedish policy designated discrimination, xenophobia and racism as “issues of high priority”. The concept of “tolerance” was replaced by that of “respect”⁶⁷. The latter meant an active and reciprocal engagement of immigrants and ethnic Swedes. Following the EU Racial Equality Directive 2000/43/EC and Employment Equality Directive 2000/78/EC, the new Commission of Enquiry into Discrimination, *Diskrimineringsutredningen* was appointed in 2001 to expand the scope of existing anti-discrimination legislations namely the 1999 Law Concerning Measures to Counteract Ethnic Discrimination in Working Life.⁶⁸ Furthermore, the Commission proposed the adoption of a law⁶⁹ that was enacted in 2003.

On 22 April 2004, the government launched another enquiry named Power, Integration and Structural Discrimination. Its voluminous seven-part report released between 2005 and 2006 dealt with the academic literature on discrimination (SOU 2005: 41), testimonies from immigrants (SOU 2005: 69), the political participation of immigrants (SOU 2005: 112), the treatment of immigrants by the media (SOU 2006: 21), the experiences of immigrants within the justice system (SOU 2006: 30), the contribution of immigrants to the welfare system (SOU 2006: 37) and democracy (SOU 2006: 40).

The Danish Plan contained fewer anti-racist provisions. Existing legislations were UN agreements dating from the 1970s such as the 1969 ILO Convention No. 111 or EU Directives (Dir 2000/43/EC, Dir 2000/78/EC) that governments were slower to implement. This development, Olsen writes, stems from the neglect of immigrants’ interests during labour market negotiations (2009). An attitude that is rooted in the self-understanding of the Danish society and policymakers especially right-wing ones as not racists and the policy of

⁶⁷ Prop. 1997/98: 16: 1.

⁶⁸ Lag 1999: 130.

⁶⁹ Prop. 2002/03: 65.

assimilation that “pushes the concern about discrimination of minorities to the background”⁷⁰. This behaviour and the more stringent conditions applied to immigrants in Denmark than in Sweden can also be ascribed to the influence exerted by the Danish People’s Party⁷¹.

IV. “Traces” and Referrals to Cultural Policies

A) The Freedom of Choice Goal of Prop. 1975: 26 and the “Culture and Religion” Section of Prop. 1997-1998: 16

While there were affirmations of multiculturalism in all the main Swedish official integration policies, Prop. 1997/1998:16 these lacked as much elaboration as socioeconomic integration issues. Following Favell’s conceptualization,⁷² they constituted “traces”. Indeed, the meaning of the Freedom of Choice goal of the 1975 Integration Policy, Prop. 1975:26 was *not debated at all* as reminded in the 1985 Integration Bill.⁷³ Sven Allur Reinans, a member of the drafting commission and a longtime actor in Swedish migration policy disclosed 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’ (Email Correspondence with Ingegerd Municio-Larsson, June 2011).

In the mid-1980s, the government-appointed Commission on Immigration (IPOK) in charge of formulating the second Integration Policy, Prop. 1985/86:98 *Om invandrarpolitiken*, (About Immigrant Integration Policy) re-examined the three 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.⁷⁴ It was neither multiculturalist

⁷⁰ Ibid., 47.

⁷¹ Rydgren *Radical Right-Wing Populism*.

⁷² Favell, *Integration Policy*.

⁷³ Prop. 1985/86:98: 19-20.

⁷⁴ SOU 1984:58, 44.

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 the Freedom of Choice Goal.⁷⁵ In the end, it formulated a new definition of the concept referred to simply as immigrants' own language and culture.⁷⁶ 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.⁷⁷ But in a reversal, the government concluded in 1991, in another Bill, Prop. 1990/91:195, that neither native Swedes nor immigrants could attain full freedom of choice. The Freedom of Choice Goal was not much "thicker" than the affirmation that religious, linguistic, ethnic and Sami groups should be given the means of preserving their culture included in the constitutional reform of 1974 (regeringsformen).⁷⁸ In a similar fashion, Swedish lawmakers affirmed in the section "Culture and Religion" of the third 'integration' Bill, Prop. 1997/98: 16 published in 1997, their support for immigrants' cultures but referred to the second cultural policy, Prop. 1996/1997: 3⁷⁹ and the Cultural Council of the Ministry in charge of Culture for the delivery of material support to immigrants' associations.⁸⁰ Parliamentarians stated that Sweden's new-found cultural diversity should be manifest in the country's cultural productions and institutions. In order to promote tolerance and understanding of immigrants, it was important both to produce a body of knowledge on

⁷⁵ SOU 1984:58, 48.

⁷⁶ Prop. 1997/98: 16: 18.

⁷⁷ Prop. 1985/86:98.

⁷⁸ Kungörelse 1974:152.

⁷⁹ Prop. 1997/98:16: 66-69.

⁸⁰ Prop. 1997/1998:16: 40.

diversity and allow these immigrants to have pride in and knowledge of their cultural heritage. They endorsed the conclusions of the report Forum for World Culture (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 Konstmuseer, Folkens Museum and Nordiska Museet), the Swedish National Heritage Board, the National Archives and the Swedish Exhibition Agency to undertake activities promoting ethnocultural diversity.⁸¹ Even the preliminary report of the above Integration Bill, SOU 1996:55, *Sverige, framtiden och mångfalden* (Sweden, the Future and Diversity) also referred issues concerning immigrants' cultures to the cultural policy report SOU 1995:84, *Kulturpolitikens inriktning* (Cultural Policy Orientation), preceding the second Cultural Policy Bill, Prop. 1996/1997:3.⁸² Lastly as in the mid-1970s, the cultural policy Bills was formulated before the Integration Bills.

In the Danish context too, there were hardly any references to immigrants' cultures in the 1998 Integration Act. The Act mandated the acquisition of local norms and values referring to Danish cultural beliefs and practices. A special Act on Danish Language Teaching was enacted alongside abolishing home language teaching for non-Western immigrants' children only and requesting them to learn Danish.

B) State Cultural Policies: the Swedish Agenda for Cultural Pluralism, Prop. 1974:28, Prop. 1996/97:3 and the Danish Cultural Canon

Significantly, multiculturalism was the object of more deliberation and elaboration in cultural policies. In the first cultural policy, Prop. 1974:28 New Cultural Policy "*Ny Kulturpolitik*",⁸³

⁸¹ Prop. 1998/97: 16: 69.

⁸² Ibid., 18.

⁸³ Tawat, *The Birth of Sweden's Multicultural*, 11

recognition of immigrants' cultures but also material support for their preservation, two variables of the Queen's University Index were included. While the Cultural Policy first referred to the 1975 Integration Policy for concrete measures,⁸⁴ the later referred back to it and specifically to its annex Prop. 1975:20 On the State Cultural Policy 2 "*Om kulturpolitiken 2*"⁸⁵ In the second Cultural Policy Bill, Prop. 1996/1997:3 Cultural Policy, "Kulturpolitik" finalized on 12 September 1996, multiculturalism was kept as one of the seven policy goals but redefined as "Mångfald" (diversity).⁸⁶ "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."⁸⁷ Two core ideas were embodied in this concept: ethnocultural diversity as 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 affirmation of multiculturalism. It claimed that the injection of new cultural expressions by immigrants would stimulate, renew and improve Swedish culture and immigrants' situation. More diversity would tackle discrimination and xenophobia.⁸⁸ The government created a working group named *Forum för Världskultur* (Forum for World Culture) (SOU 1997: 95) to implement various projects on music, dance, theatre, museums, exhibitions and communication showcasing immigrants' cultures. A new action plan, *Dagordning för Kultur 2003-2006* (Agenda for Culture) was launched in 2003 with two main objectives: an investigation into the way publicly-funded cultural institutions implemented

⁸⁴ 1975: 20: 234 ff.

⁸⁵ Tawat, *The Birth of Sweden's Multicultural*, 11.

⁸⁶ Betänkande 1996/97:KrU1 Kulturpolitik, m.m. prop. 1996/97:3 och prop. 1996/97:1 utgiftsområde 17. Tawat, Mahama (2006) *Multiculturalism and Policymaking*, p. 34.

⁸⁷ Prop. 1996/1997: 3, pp. 22-23 and p. 227.

⁸⁸ Prop.1996/1997: 3: 23.

ethnocultural diversity in their services and the celebration of a Year of Multiculturalism in 2006.⁸⁹

Like in Sweden, most immigrant cultural provisions were incorporated in cultural policies. Although, these favour assimilation. While between 1993 and 1996 under her term as Minister in charge of Culture, Jytte Hilden sought to implement a multiculturalism policy, this initiative bore little fruit (see Tawat 2014). The government's most important measure was the affirmation of assimilation with the publication of a Canon of the Danish Culture *Kulturkanon*. In 2005, Brian Mikkelsen, the Minister in charge of Culture commissioned seven committees to formulate a Canon of Danish Culture⁹⁰ that will elicit milestones in Danish culture, act as a platform of discussion, and strengthen the sense of community of Danes in an ever globalized world.⁹¹ The final work released in 2006, consisted of 96 works. Yet, none of these canonized works was authored by a non-western immigrant or conveyed the immigrant experience.

Conclusion

Intertwining theoretical perspectives from policy convergence, the policy process and immigrant integration, this article has shown that Danish and Swedish official integration policies have been more convergent than commonly assumed between 1960 and 2006. They have mostly evinced socio-economic issues rather than political and cultural ones. Prior to the 1980s migration crisis, these policies dealt specifically with workplace problems. In regards to direction or the position of each country, Swedish policymakers were forerunners but the

⁸⁹ Direktiv 2004: 169

⁹⁰ Kultur Ministeriet 2010.

⁹¹ Council of Europe/ERICarts 2011.

movement of this convergence (mobility) was rather slow. Swedish policymakers legislated only reluctantly under pressure from associational groups and their Danish peers failed to draft more than a report enquiry.

From the period of migration crisis in the late 1980s onwards, there was a change in policy content. Joblessness among immigrants superseded workplace problems as the main issue of concern for policymakers. The strength of the movement (mobility) also increased as governments in both countries scaled up their actions against what were seen as failing policies. They devised various activation measures such as anti-discrimination legislations, tax and financial incentives for employers who recruited immigrants and for those immigrants who actively sought employment. However, while Swedish policymakers cut back the role of the central government and devolved power to local government, Danish policymakers shone by their activity thereby catching up with Sweden. In the year 2000s, both countries' policymakers injected features of economic managerialism such as benchmarking and targets with much inspiration coming from Denmark. These official policies contained provisions for assimilation in Denmark and multiculturalism (affirmation and material support for immigrants' cultures) in Sweden. However, these were traces because of their limited nature and subordination to the Ministries in charge of Culture's policies. However, the countries' policies diverged regarding their incorporation regimes. Sweden practiced a corporatist model until the late 1990s when it started to devolve responsibilities to associations (liberal model). Meanwhile Denmark made the reverse journey.

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