

MIGRANTS IN THE SCANDINAVIAN WELFARE STATE

The emergence of a social policy problem

Abstract

During the 1990s and more so after the turn of the century, the authorities and the public in Scandinavia have become increasingly concerned about the pressure on welfare inflicted by the immigration of people with low skill levels from countries in the South. A large proportion of these newcomers have proven difficult to integrate in the Scandinavian labour market, which is characterised by high demands for skills and a compressed wage structure that makes low-skilled labour comparatively expensive. The universalistic welfare approach, implying a generous inclusion of legal newcomers from day one, in combination with the highly regulated and knowledge-intensive labour market has made the three states, Denmark, Norway and Sweden, particularly exposed to disincentive challenges as concerns the absorption of immigrants in gainful work. This article discusses the current development in the immigration/welfare nexus in the Scandinavian region.

Keywords

Citizenship • immigration policy • integration • migration • welfare policy

Grete Brochmann¹, Anniken Hagelund²

¹ Department of Sociology and Human Geography,
University of Oslo, Norway.

² Institute for Social Research,
Oslo, Norway

Is immigration bad for the welfare state? This simplistic and over-arching question has been increasingly raised in public and scholarly debates during the last two decades. Gary Freeman was in many ways before his time when he in his much-cited article from 1986 posed a fundamental contradiction between inclusive welfare policies and comprehensive international migration. His main argument was that immigration has a tendency to erode the normative consensus on which generous welfare systems depend. "When the welfare state is seen as something for 'them' paid by 'us', its days as a consensual solution to societal problems are numbered" (Freeman 1986: 62). It took some years until new academic voices followed up on this basic relation between welfare and immigration, but as we now enter the second decade of the 21st century, the juxtaposition has developed into a core issue in migration research.

The Nordic region is famous for its welfare model. It represents a particular type of welfare state characterised by universal access, generous benefits, a high degree of public involvement and comparatively high levels of redistribution. The combination of economic success and high levels of social justice has drawn considerable interest, even admiration, to the Nordic welfare states from the international research community.

In international *migration* research, however, the Nordic countries appear as peripheral and in no way as one *model*. On the contrary, the Scandinavian countries can appear as quite opposite. Sweden has been fairly well known for its multiculturalism and relatively liberal stance towards refugees. Denmark, on the contrary, has made itself known at the international scene as representative of a particularly draconian version of immigration and integration policies, which some will claim border on the illiberal. In the international literature, Norway is probably the least talked about Scandinavian case, a silence that is enhanced by its position outside of the EU. Policywise, it appears to be positioned somewhere between the liberally minded Sweden and the restrictionist Denmark.

Considering the strong links between immigration, integration and welfare state policies, it appears paradoxical that countries with relatively similar welfare state models end up with such discrepant models for inclusion of newcomers. How did the three countries end up with different approaches to immigrant integration? Furthermore, how different are they really? While certain aspects of both policy and political discourse are highly divergent, other aspects of the countries' immigrant policies are less discrepant.

In this article, we will provide some substance to these questions

* E-mail: grete.brochmann@sosgeo.uio.no, ahl@samfunnsforskning.no

from a historical perspective, where we analyse the genesis of the specificities of the welfare/immigration nexus in the Scandinavian region.

1 Framing the problem

Since Freeman's early take on the relations between the welfare state parameters and the challenge of immigration, the field has expanded in scientific scope. Stretching into the vast citizenship literature, the sphere of interest now also includes questions of cultural rights, identity issues, nationhood and eventually transnationality, but if we try to delineate the relation between immigration and the welfare state institution as such, four tendencies can be distinguished in the academic discourse.

The first analytical position focuses on economic *sustainability*; generous welfare distribution depends on a restrictive selection of its new members to avoid being overburdened. According to Michael Walzer, "The idea of distributive justice presupposes a bounded world within which distributions take place: a group of people committed to dividing, exchanging and sharing social goods, first of all among themselves" (Walzer 1983: 31). Christian Joppke states more bluntly, "Because rights are costly, they cannot be for everybody" (Joppke 1999: 6). Seyla Benhabib's (2002) concept *bounded universalism* pinpoints this logic, in which internal redistribution is combined with economically motivated access restrictions.

The second position, which is related to the first, deals with the interconnection between *boundaries and bonds* – Freeman's "normative consensus": the popular support necessary to sustain the basic structure of a redistributive welfare state in democratic societies. This tendency, in international discourse often labelled as "social cohesion", asserts that increasing ethnic diversity will inevitably weaken the normative consensus, hereby also gradually undermining the foundation of the welfare state. Alesina & Glaeser (2004) and David Goodhart (2004) are frequently cited as belonging in this perspective. Robert Putnam (2007) touches upon much of the same, without explicitly discussing the welfare state.

Another set of scholars have developed a platform from which they argue against, first and foremost, the "social cohesion" approach. Through international comparative data Banting and Kymlicka, for example, seek to demonstrate the lack of empirical proof as to the cohesion hypothesis. On the contrary, they argue, it seems that good welfare states themselves cushion the potential negative effects of immigration and diversity. Markus Crepaz (2008) takes this institutional argument a bit further in arguing that institutions can shape the success of integration, indicating that it is up to the welfare state design to encumber vicious effects of immigration-induced diversity. In comparing the US and the European context, he makes a point to the effect that when the modest American welfare system was in its infancy, society was already racially divided. In Europe on the other hand, institutionally strong welfare states were already in place

when the new comprehensive immigration sparked off. According to Crepaz, this fact has made the European welfare states more robust in withstanding pressure against generalised trust, as the ability to include newcomers as eligible for welfare and care was already established.¹

Finally, in a recent article, Ruud Koopmans (2010) places himself in a position that can be singled out as a fourth approach to the juxtaposition: While the former perspectives focused the sustainability of the welfare state with respect to economy and public support respectively, Koopmans argues that it is unfortunate combinations of welfare and multicultural policies which are unsustainable. Where scholars such as Banting, Kymlicka and Crepaz find evidence that the generous and inclusive welfare state handles immigration better, Koopmans finds that particularly in the welfare states that combine generosity with multicultural policies "which do not provide strong incentives for host-country language acquisition and for interethnic contacts" (*ibid*: 3) immigrants fare the worst. In this perspective this type of welfare state is bad for the immigrants themselves as "it may lead to dependence on welfare-state arrangements and thereby to social and economic marginalization" (*ibid*: 2). Through a comparative analysis he claims that easy access to equal rights, when combined with a generous welfare state, leads to weak labour market participation, high levels of spatial segregation, and overrepresentation in the criminal statistics. Poor socio-economic integration of immigrants is thus blamed on the welfare state and multicultural policies. This (somewhat paternalistic) argument makes welfare generosity towards newcomers not only bad for immigrants, but also bad for society at large.

2 A Scandinavian point of departure

In the current Scandinavian public discourse on welfare and immigration, all four perspectives are present, although to varying degrees and not necessarily in an explicit manner. During the 1990s and more so after the turn of the century, the authorities and the public have become increasingly concerned about the pressure on welfare inflicted by the immigration of people with low skill levels from countries in the South. A large proportion of these newcomers have proven difficult to integrate in the Scandinavian labour market, which is characterised by high demands for skills and a compressed wage structure that makes low-skilled labour comparatively expensive. The *universalistic* welfare approach, implying a generous inclusion of legal newcomers from day one, in combination with the highly regulated and knowledge-intensive labour market has made the three states – Denmark, Sweden and Norway – particularly exposed to disincentive challenges as concerns the absorption of immigrants in gainful work. The specificities of this welfare state/labour market nexus basically premised the restrictive immigration regulation instituted in the early 1970s in the region: Because rights are costly but should be for all, only a few select can be let in. Consequently, the

Walzer-Joppke perspective is one of the constituting features of the Scandinavian migration policy approach.

Furthermore, the Koopmans perspective has increasingly gained attention in the region, and particularly in Denmark since the turn of the century. A glance at two parallel, yet strikingly opposing investigations from 2007, illustrates the point: OECD's annual International Migration Outlook for 2007 (OECD 2007) reveals that the Scandinavian countries are placed at the very bottom of a scale that measures integration of immigrants in the labour market – together with the Netherlands. Sweden performs worst of all. Concurrently, the Migrant Integration Policy Index (British Council 2007) places Sweden at the very top among 28 European states when it concerns integration policies, that is, the formal extension of rights to immigrants. Norway is placed 8th, whereas Denmark shares the 21st place with Poland, only ahead of countries such as Malta, Slovakia, Greece, Austria, Cyprus and Latvia (British Council 2007). Seen together, these surveys leave the impression that the extension of rights to immigrants in the region has had marginal impact on the ability of the states to swiftly include newcomers in productive work.

The social cohesion approach and its counterpart have increasingly been attended, particularly in Denmark, but also to a certain extent in Norway over the last decade. Cultural conflicts have been connected to welfare state sustainability, and used as fuel for discussion on the limits of solidarity. The broad political support of restrictions both on access to family reunification and citizenship, and on welfare support for newcomers introduced in Denmark in the past decade can be read as an indication of Freeman's theorem: A majority not wanting a welfare system as something for "them" paid by "us". Sweden on the other hand, exemplifies a Crepazian system, trying to use its institutional basis to withstand erosion of welfare state legitimacy for all it is worth.

In this article, the Scandinavian welfare model serves as a common point of departure. By and large, the three countries have subscribed to a very similar institutional welfare approach. The types of immigrants that have entered the respective countries since the 1970s have also been equally uniform: Labour migrants in an early phase and relatively high proportions of humanitarian migrants after the introduction of "immigration stops" in the mid-1970s. The – at least seemingly – significant variation between the countries as far as immigration policy is concerned must therefore be explained through other factors. We will in the following track the three countries' historical trajectories of evolving immigration and immigrant policies from the perspective of the welfare state. Immigration increasingly appeared in the political discourses of these countries as social problems with relevance not only to immigration control regimes but also to social policy. Our ambition here is to give some insight into how the three countries' particular takes on the challenges of immigration and integration have developed historically. In doing this we will not only confirm the existence of divergences, but also problematise them. The Danish migration scholar Ulf Hedetoft has described the apparent Swedish–Danish divide as one of *discursive divergence and*

practical convergence, and we will see if there is something to this claim (Hedetoft 2006). This endeavour entails looking at the interaction between the three distinct policy fields: First, immigration control policies regulating terms of entry and newcomers' gradual access to liberal, political, and social rights (citizenship). Second, integration policies that are specifically targeted at managing the incorporation of immigrants into society, for example, language instruction and labour market training. Third, general social policies that are targeted at the overall population, but which also affect immigrants' standards of living – sometimes to a higher extent as many migrants have a more precarious position in the labour market.

3 The new migration to Scandinavia: the emergence of a social policy problem

Of the three, only Sweden was a country of immigration in the first post-war decades. Its system for recruitment of foreign migrant workers was fairly well developed already in the 1950s. Only in the late 1960s did Denmark and Norway become countries of net immigration with a considerable proportion of the migrants arriving from new sender-countries such as Yugoslavia, Turkey, Morocco and Pakistan. Today, Sweden still has by far the largest population of immigrants and their descendants (2008: 17.9%), but in Denmark (2009: 10.4%) and Norway (2009: 10.6%) sizeable parts of the population were either born in another country or have parents who were both born abroad.

The early migrants encountered Scandinavian societies in the midst of a phase of economic growth and tremendous welfare-state expansion. For a short period the borders were quite open to foreigners seeking work, who could enter as tourists and later get work permits. Politically, the issue of immigration initially appeared as a potential answer to the challenge of securing necessary labour power for the countries' expanding economies. Corporative traditions with strong trade unions meant that questions pertaining to the migrants' work and wage conditions were crucial in political debates on immigration, and various safeguards were put in place to counter tendencies of pressure against the work and wage conditions of native workers. While the general assumption was that most migrants would go back to their home country after a while, none of the countries adopted a formal guest worker model that obliged migrants to return. However, the implications of immigration for social policy and for the welfare states' institutions were not on the agenda, yet. Special integration measures to address migrants' particular challenges, their cultural–religious needs or to ensure their integration into society were few, but as legal residents they were to a large extent included in the general welfare state institutions on par with citizens.

All in all there is little in this early phase that points towards the national differences with respect to immigration and integration policies that we see today. The main difference is between Sweden

on the one hand and Denmark and Norway on the other, and this is mainly a matter of scale and timing of immigration. Immigration to Sweden was higher and started earlier than in the neighbouring countries. For the latter two this meant that Sweden was the obvious example to look at when Norwegian and Danish politicians eventually had to develop a policy to manage immigration and its social and cultural consequences. In the early 1970s the combination of growing immigrant numbers, international economic decline, and growing attention directed at migrants' poor living conditions meant that new political claims emerged with force. These were claims for policies to control immigration and to counter the seeming emergence of migrants as a new *social problem*. Again Sweden was first.

Sweden began to put in place new restrictions on foreign migrants' access to the country from 1966–67 and in practice closed the borders for migrant workers in 1972. Similarly, restrictions were introduced in Denmark from 1969–70 with a full stop from 1973, and in Norway the restrictions started in 1971 and the "stop" came in 1975. In all three countries the restrictions were primarily aimed at labour migration from poor countries to the low-wage sectors of the labour market. Exemptions were put in place not only for high-skill workers, but also for migrants seeking family reunification and for refugees. In the decades to come, it is the latter categories of family migrants and refugees that have made up the bulk of immigration from non-Western countries, reaching levels that few, if any, had anticipated in the early 1970s.

The restrictions placed on immigration were being argued for, in all three countries, in terms of the *social* challenges the new immigration had brought about. The welfare state was in its golden age. In the words of the Norwegian historian Francis Sejersted it was social democracy's happy moment (2005). Yet migrants seemed not to benefit from the new security and affluence. Poor housing, harsh work conditions and vulnerability to exploitation dominated contemporary narratives of the plight of the migrant worker, and implied the potential emergence of a new *underclass* (Brox 1973). In societies that to such an extent defined their success in terms of the absence of social inequalities, immigration thus represented a threat to the very identities of the national communities. This quote from the Norwegian parliament's debate on whether to introduce an immigration stop in 1974 – admittedly untypical in its colourful use of metaphors – illustrates the sentiments well:

Through generations Norwegians have struggled to abolish poverty and differential treatment of people. We have sought to break down social divisions and build a society based on justice and equality. We have reached quite far in this respect. Now, we do not want to acquire another social cancerous tumour, a new slum with a pariah caste, something experiences from other Western European countries demonstrate that the foreign worker problem soon can degenerate into if one lets it run more or less uncontrolled. We need a certain time to consider this in order to prepare a strategy on how to ensure more humane conditions for our guests. The wishes of employers and working

life cannot be determining, but our ability to give our guests a decent and equal treatment. Thus we cannot give the problem a bigger extent than what we at any time can deal with (MP Tor Oftedal, Labour Party, Stortinget 10.12.1974).

The solution was a double one: Restrictions on immigration, so as not to "give the problem a bigger extent than what we at any time can deal with" (*ibid*), and efficient social policies that would ensure that migrants were included in society in a way that did not entail the emergence of new "slums".

While this general assessment of the challenge of immigration as one of avoiding the emergence of new social inequalities appear quite similar in the three countries, we do also in this period see signs of divergence with respect to strategy and policy development. First, the three countries adopted different approaches to the cultural diversity immigrants represented. Second, they chose different institutional solutions with respect to how they organised the delivery of integration policy.

In all countries the main principle was that immigrants had the same social rights as citizens: Migrants' needs for welfare services should mainly be covered through the ordinary workings of regular welfare state institutions. However, especially in the Swedish political discourse cultural minority issues were high on the agenda, and the dominant view was that special measures had to be put in place in order to take care of migrants' particular needs both as newcomers (Swedish language training, information) and as ethnic and cultural minorities (needs to maintain culture and mother tongue, and enable worship). The multicultural immigrant policy that was formulated by the Swedish parliament in 1974 obliged the welfare state to take care of migrants' special needs, including their right to maintain their own culture as cultural minorities in Sweden, within the framework of the universal welfare state. Equality in this version entailed also equal rights to have one's cultural needs recognised. The freedom of choice – choosing the extent to which one wanted to acculturate or maintain own culture – was held high. Rather than seeing this freedom of choice as a contrast to the highly centralised Swedish system with its unitary standardised welfare solutions, this can be understood as a necessary concession by the social democratic welfare state – by granting culturally diverse groups the freedom to opt out of Swedish homogeneity, the unitary solutions could be maintained (Gür 1996). The country had then already, in 1969, established a distinct directorate responsible for matters of immigration and integration policy, although in practice immigration control issues far outweighed integration issues in the directorate's daily activities.

Some years later the Norwegian government formulated an immigrant policy that was clearly inspired by the Swedish example, with parts of the white paper closely resembling earlier Swedish formulations. The freedom of choice formulation, for example, was reiterated, but in contrast to Sweden, cultural rights were not given legal form. The need for targeted efforts to achieve real equality is recognised, but responsibility remains within the ordinary welfare

apparatus without a distinct organisation such as the Swedish directorate being erected.

In Denmark too, claims for a more developed integration policy were made, but the government's chosen strategy was to offer migrants equal opportunities within the existing system, without recognising any need for targeted measures to satisfy culturally based special needs. Politically the climate was more conflict-laden than in both Sweden and Norway, as Denmark already had an anti-immigrant radical right party, the Progress Party, making explicit claims for higher degrees of assimilation. Quite contrary to this, both Norway and Sweden were characterised by party political consensus on the need for cultural sensitivity. Conservatives in Sweden even argued – unsuccessfully – for minorities' right to establish separate institutions, such as schools, on the side of the public and unitary welfare system.

4 From “full” stops to new “flows”: humanitarian migration

Most of the debates on integration and the principles of welfare state incorporation of migrants' needs and rights in the 1970s were conducted with labour migrants in mind. Judging from the policy documents of that time, this was a type of immigration policymakers believed could be regulated and controlled according to the needs of the labour market and the capacity of the welfare state. These policies now met the realities of changing migratory trends and movements that were less easy to control. The borders had effectively been closed to labour migrants from the South, but migration continued through family reunification (which was less discussed publicly) and refugee migration – both types of migration that were legitimised with reference to international and humanitarian obligations. All countries saw the numbers of asylum-seekers rise dramatically in the 1980s. In Norway, for example, only a few hundred asylum-seekers arrived annually in the early 1980s; 8,600 came in 1987.

Smaller groups of refugees had been arriving in the three countries throughout the post-war era too, but they had tended to be treated as a phenomenon quite distinct from the labour migration that received the bulk of the political attention. Despite the overall principle that migrant integration was the responsibility of the general welfare state institutions, social work for refugees had in both Norway and Denmark been effectively delegated to non-governmental organisations with public funding. The two countries' refugee councils had established and for several decades run reception facilities to assist the refugees in their first two years in the country. This included housing facilities, language classes, social workers and labour market advisors. Now, the arrival of refugees and asylum-seekers, their numbers and legitimacy, and their need for services and incorporation into Scandinavian societies, were to dominate the political debates on immigration and integration in next decades. This constituted a massive logistical challenge and, not

least, a political one that challenged the legitimacy of the authorities' immigration policies in a way not hitherto seen.

In Norway the rise in asylum-seeker figures paved the way for the electoral breakthrough of the anti-immigrant Progress Party. In the 1987 election the party campaigned not only against asylum immigration as such, but also against the alleged preferential treatment these people received from the welfare state. Special measures and special benefits played a pivotal part in the party's argumentation, construing the migrants as receivers of welfare benefits from which Norwegians were excluded. In the words of the party's charismatic leader, these were funds “that could alternatively have been used to help weak groups like the disabled, hard up elderly and sick people” (Carl I. Hagen, *Stortinget*, 1.11.1988). Even in Sweden, the right populist anti-immigration party New Democracy experienced short-term success by gaining 6.7 per cent of the votes in the 1991 election (Rydgren 2004). In Denmark, the Progress Party had enjoyed a sizeable following since the 1970s and with the rise of immigration, this issue was also incorporated among the party's key issues and developed further by its successors in Pia Kjaersgård's Danish People's Party from 1995 (Andersen 2004).

The dramatic increase in arrival of asylum-seekers brought about a number of practical challenges: Thousands of people needed temporary accommodation for months and years as case backlogs increased and appeals were pending. When positive decisions were eventually made, the (former) asylum-seekers moved into municipalities where they needed housing and in most cases also language training and social assistance until they were able to find work. The growth in numbers also meant that original ambitions about placing refugees in localities where suitable work and education facilities existed had to be abandoned in favour of taking-the-whole-country-into-use type of strategies where refugees were settled where accommodation could be found.

Low employment rates among immigrants with background from non-Western countries became apparent in the 1990s. All countries, although to a lesser extent Norway, experienced growing unemployment rates in the early 1990s, and the migrant populations were hit particularly hard. More extensive surveys on living conditions among the immigrant population were being conducted, and the pictures that emerged pointed to large inequalities between migrants and the native population. “Give me a job” was the telling title of one such study. This first survey of living conditions among refugees in Norway pointed to the lack of work and resultant long-term dependence on social assistance as key obstacles for refugees' integration in Norway (Djuve & Hagen 1995). At the same time, social policies in general were being scrutinised and reformed to maximise work incentives for the population at large.

To a large extent, the challenges facing policymakers were similar in the three countries: An immigration that due to its humanitarian nature was difficult to control, coupled with low employment rates, and an increasingly visible gap in living conditions between migrants and natives. But there were also differences: in Denmark and

Norway radical right parties were able to take advantage of the situation and profit politically on popular scepticism against immigration. In Sweden, New Democracy only acquired short-term success, thus enabling a lower degree of politicisation and public debate on the issues than in the neighbouring countries. Institutionally, the countries also found different ways to manage the integration process. In Sweden specialised state institutions were erected at an early stage to take responsibility for the integration of newcomers, Norway followed suit somewhat later; while Denmark until late in the 1990s still maintained the principle of applying the same general solutions for all, with the important exemption of refugee integration which was handled outside of the state apparatus. However, in all countries the overall principle was that migrants had the same formal rights to welfare as every other citizen, the ideal being that the general welfare state should be able to cater to migrants' needs as part of its ordinary activities. Sweden gave up its most radical multicultural ambitions of minority rights to cultural survival in the mid-1980s, thus aligning with the other two's principle of meeting culturally diverse *individuals'* needs within the universal welfare state model.

5 The active welfare state

The sense of failure in including migrants both in the labour market and in society at large has grown stronger in all countries in the past two decades. During the 1990s and 2000s the countries have to varying extents reform the initial models in order to handle the challenges of cultural diversity, and more generally to increase employment and reduce dependency of social benefits in the immigrant population. Below we discuss each of the three countries' reforms and continuities separately.

5.1 Denmark

Danish authorities, compared to their Scandinavian neighbours, were late in developing an explicit integration policy. When they did, there was a strong focus on integration through the labour market mixed in with a rhetoric that took a far more negative approach to cultural difference than in either Sweden or Norway. The willingness to use immigration and integration policies to put a curb on what were deemed as undesirable aspects of migrants' culture made Danish policy choices internationally controversial, as demonstrated most powerfully in the so-called 24-years rule on transnational marriages.²

As noted, until 1998 it was an NGO, the Danish Refugee Council, which was responsible for social work for refugees for the first two years of residence. Other migrants received necessary welfare support from the municipalities in which they lived, generally on the same conditions as citizens. There was no directorate or ministry dedicated especially to immigration or integration issues. In the early 1990s the institutional responsibility for immigration and

integration issues was centralised to the Ministry of Internal Affairs. At the same time, a number of reports were published, all pointing to the need to improve migrants' labour market participation to ensure better integration. Both in the media (Hervik 1999) and in academia (Mogenssen & Matthiessen 2000) attention was directed at the poor work incentives many migrants faced, as welfare benefits often were fairly generous compared to earnings in the low-skilled jobs migrants typically have been restricted to.

In 1998 the Integration Act was adopted, which substantially increased state control over the settlement and integration of newcomers. The Act included a plan for geographic dispersal of refugees. Central authorities distributed newcomers to municipalities according to local quotas, and barriers were established on refugees' ability to transport their integration benefits from the municipality where they were initially settled. The responsibility for refugees' integration was transferred from the Danish Refugee Council to municipalities, which were obliged to offer all new non-EU immigrants (not only refugees) an introductory programme aimed at providing basic qualifications for future employment or education according to individual action plans. The introductory programmes are extensive, demanding full-time activities for up to three years. Participation in these programmes was linked to the payment of the newly devised "introduction allowance", which was at a level considerably lower than the social assistance benefits newcomers had hitherto been entitled to. This latter element in particular became heavily debated. In a welfare state perspective, such differentiation of rights to income assistance according to nationality and migrant status constituted a significant break with the universalistic welfare state model.

In the election campaign of 2001 immigration and integration policy played a decisive part, contributing to a change of government from social democracy to a liberal/conservative coalition with the support of the Danish People's Party. This government not only continued the "integration through the labour market" agenda, but it also carried out changes of the immigration control regime in order to restrict non-Western immigration. Issues pertaining to cultural and religious difference and conflict have been high on the agenda – the debates surrounding forced and arranged marriages including the 24-year rule, and the Muhammed cartoon affair are just some examples.

The original introduction allowance, which was scrapped after one year, came under attack for its differential treatment of migrants and natives. The new government devised a number of new policies that formally applied to all residents, but which in practice were targeted at, and primarily affected migrants. Thus Denmark provides an example of a country that has reformed its general social policies in order to tackle issues associated with migrants in particular. The introduction allowance (to people on an introductory programme) was again brought to a level below social assistance, but now in tandem with a "start assistance" which applied to everyone, including Danish citizens, who had lived in the country less than seven out of the past eight years. *Forklædecirkulæret* (the apron directive) meant that in cases where both spouses were on long-term social benefits,

one partner's benefit was replaced with a spouse's supplement. The aim was to increase work incentives for families where both spouses were out of work. The underlying suspicion was that in many migrant families, at least one of the spouses would not genuinely be searching for work – in contrast presumably to majority families where the norm is for both spouses to work. Changes in the regulations of child benefits meant that parents who did not follow up on so-called *forældrepålæg* (parental orders), for example about regular school attendance, could lose their child benefits. Again the intended target group was migrant families who took their children to the countries of origin for extended periods of time.

Citizenship legislation has been reformed in a way that suggests an understanding of naturalisation as a reward for successful integration. Applicants need to be economically self-sufficient, not having received social assistance or integration benefits for more than one out of the past five years. Knowledge of the Danish language must be documented, and the applicant needs to pass a citizenship test with questions about Danish social affairs, history, and culture. A test will also be established for prospective immigrants seeking family reunification in Denmark.

On the other hand, Danish integration policies also provide migrants with rights and opportunities. The strong focus on integration through work has been followed up by extensive targeted programmes in order to provide migrants with the qualifications they need to find work (Djuve & Kavli 2007). In contrast to both Norway and Sweden, the introductory programmes do not only apply to humanitarian migrants, but also to family migrants (excluding those who have been reunified with an EU/EEA citizen) – thus a wider group is entitled to fairly extensive individually adapted basic training. In addition, Danish language training is formulated as a right for immigrants, and for humanitarian and family migrants it is also free of charge. Danish political scientist Jørgen Goul Andersen has thus labelled the start assistance an exception, and concludes that the welfare state has remained inclusive to those immigrants who are in the country. The more radical change concerns the measures established to limit the number of refugees and family migrants arriving in the first place (Andersen 2007).

5.2 Norway

The integration regime established in Norway was, despite the existence of a coordinating directorate, comparatively decentralised. Municipalities were free to decide if and how many refugees they were willing to settle, thus making negotiations between central and local authorities a significant part of the implementation of policy. Municipalities received a set subsidy per settled refugee, thus providing local authorities with an incentive to offer efficient labour market training. If newcomers rapidly moved on from the local social assistance budgets to become self-sufficient, municipalities would be able to make a profit out of settling refugees.³ Thus there was

no legal regulation of the type, extent, and intensity of the training newcomers were to receive, but a financial incentive structure set up to motivate local authorities to provide efficient services. In reality, the quality of the training offered varied considerably. Participation rates were often poor, and the local authorities rarely used the powers they had to sanction non-participation financially by deducting social assistance.

The Introduction Act from 2003 constituted a major leap in centralising control over the implementation of integration policy. Settlement decisions were still left to the municipalities, but the municipalities that chose to settle refugees were now instructed to offer all newly arrived refugees and their families an introductory programme along similar lines as the Danish programme. Newcomers thus obtained a right to an introductory programme with individual action plans, for up to two years. They also obtained the right to a fixed-rate introduction allowance, as opposed to the means-tested social assistance most newcomers in practice had been dependent on previously. This also meant that unless they found paid work, they had imposed upon them a duty to actively take steps to increase their own employability through programme participation. It is complicated to compare the size of the allowances paid to participants in introductory programmes in Norway and Denmark. However, it was never – as in Denmark – made a point out of, using (reducing) the introduction allowance in order to increase work incentives. The ambition, as stated in policy documents, was to get people off the social assistance system, which was deemed to promote clientification and passivity, and into active qualification; not to make public income support less financially attractive. On the contrary, the transition from means-tested social assistance to a rights-based benefit (although conditional on active participation) was seen as a potential lever to increase the dignity and sense of self-worth among refugees.

In 2005 the Introduction Act was amended to include a less extensive scheme of 300 hours⁴ instruction in the Norwegian language and social issues. This applied to all long-term immigrants (except EU/EEA citizens), not only to refugees. No economic sanctions were involved, but access to permanent residency and citizenship was made conditional on attendance. Thus also in Norway, citizenship legislation has been amended to include more specific conditions for naturalisation. Contrary to Denmark it is – so far – sufficient to participate, as no tests need to be passed. However, such tests are now on the political agenda, and in this sense there are signs of further Danish–Norwegian convergence.

All in all, the 2000s have been a time of both discursive change and of tangible policy changes. The potential of cultural conflict has been accentuated, not least following several highly publicised incidences of forced marriages, genital mutilation, and honour killings in minority ethnic communities. The position of women within such communities has thus received ample attention, and also made it easier to legitimate a higher degree of intervention in what were previously considered internal cultural/religious affairs (Hagelund 2008). A new willingness to establish compulsory programmes and courses

has clearly emerged across the whole party political spectrum, as reflected in the unanimous political support to the introductory programme and compulsory courses on the Norwegian language and social issues. While the introductory programme has a strong labour market profile – integration through work – the 300 hours is directed at enabling participation in a wider sense: Immigrants need basic skills in language and social issues to understand the fundamentals of Norwegian society and culture, and the programme imposes a duty on everyone to attain such knowledge. Finally, the sustainability of the welfare state in the age of globalisation and immigration has been problematised. Large scale EU immigration since the EU extension in 2004 – Poles are currently the largest immigrant group in Norway – led to questioning of the universal model that gives new immigrants immediate access to substantial welfare rights. This has been exacerbated by EU regulations that give EU migrants the right to export certain family benefits to spouses and children residing in another EU country. The lower employment rates and higher dependence on public income transfers in the non-Western immigrant population have also led to questioning of both the financial sustainability of the model and its legitimacy. This has resulted in the recent appointment of a public commission to investigate consequences of international migration and mobility for the welfare state model.⁵

5.3 Sweden

According to Karin Borevi (2010), Sweden's policy of multiculturalism was abandoned twice: First substantially, but in silence in 1986. Then more loudly, but with less substantive content in 1997. The Swedish government's 1986 proposition on immigrant policy stepped back from previous ambitions of freedom of choice and long-term survival for minority cultures within Swedish society. The authorities made clear that "freedom of choice" did not entail the freedom to choose *not* to be part of the Swedish community of equal citizens. Minority policy became immigrant policy and was no longer aimed at protecting cultural groups. The goal was instead to meet the needs of culturally diverse individuals within shared welfare state institutions. Information in immigrants' languages, for example, was no longer considered as a part of a long-term endeavour on protecting minority languages; it merely constituted necessary assistance to enable individuals to access services, etc. In 1986 the Government downplayed the depth of the ideological change this represented. The new integration policy that was presented in 1997 was heralded as a paradigm shift. The main challenge, as it was now formulated, was to move away from the previous targeting of immigrants as a particular group. It was argued that multiculturalism had been conserving and reinforcing the distinction between "us" and "them", and this had in itself been a driving force behind the marginalisation – *utanförskap* – migrants and their children suffered from in Swedish society. The solution was to make a distinction between policies targeted at new arrivals, such as introductory programmes,

and general policies that had to be aimed at a general population that had diversity as one of its defining characteristics. However, as Borevi points out, the idea that migrants as far as possible should be part of the same social policy programmes as the population at large was hardly new, but had in fact been a major element in the authorities' approach to migrants in Sweden from the very start of the new immigration.

In fact, introductory programmes for newcomers were already established when the new integration policy was launched in 1997. Sweden introduced introductory programmes with an integration allowance already in 1994. In this sense Sweden paved the way for the introductory programmes that were made law in Denmark and Norway in 1998 and 2003. But contrary to the Danish and Norwegian programmes, the Swedish programmes were voluntary for both municipalities (whether they wanted to offer programmes) and for newcomers (whether they wanted to take part in them). Evaluations indicate that the local authorities' implementation of central guidelines in many areas has been poor; and that only a minority of newcomers actually have taken part in a full-time introductory programme (Djuve & Kavli 2007). In November 2009, the Swedish non-socialist government coalition presented a bill on new introductory policies. This dramatically strengthens centralised control over the programmes and gives all newly arrived refugees the same right to an introductory programme. Programmes are not made compulsory but newcomers' incentive to participate is increased by raising the benefit levels for participants. Thus all the countries have established fairly similar policies to meet the particular needs of newcomers and assist them in acquiring basic qualifications for entering the labour market, but the extent to which this has been accompanied by force and sanctions has varied considerably. Or alternatively formulated, newcomers' *rights* to such services have, until recently, been weaker in Sweden than in the neighbouring countries.

Voluntariness also characterises the Swedish settlement policies, with respect to both asylum-seekers and refugees with a positive decision. While asylum-seekers in Norway and Denmark are routinely placed in reception centres and their access to means of subsistence are linked to staying there, asylum-seekers in Sweden have, since 1994, the option of organising their own accommodation with economic support from the authorities. In practice this means that a high proportion of asylum-seekers move in with friends and relatives. This system for self-settlement – *egenbosättning* – has been heavily debated due to the consequences this has for geographical concentration of newcomers in deprived urban areas where migrants and ethnic minorities already dominate. The pattern is repeated for refugees with positive decisions, who in Norway and Denmark will be settled in accordance to agreements with local municipalities. One result is that certain municipalities face disproportionately large tasks in terms of offering introductory services. The municipalities that thus receive the most newcomers have protested that they are not able to handle such pressure on

services, but so far the authorities seem disinclined to limit the voluntariness, focusing instead on providing incentives for refugees to settle voluntarily in localities where services and employment presumably are more available.

The relatively weaker emphasis placed on sanctions-backed activation policies for migrants in Sweden can be understood in relation to the dominant modes of explaining migrant marginalisation – *utanförskap* – in the Swedish discourse. The welfare state's mechanisms of structural and institutional discrimination have been focal points in several policy papers and official reports (Jørgensen 2006). As it was said in one, albeit highly controversial, public report:

It has been shown that the general welfare system, which has as its aim to reduce social and economic inequalities and offer equal opportunities to all, in reality is selective, conditional and even contributes to cement structural inequalities in society. As the social security system is based on a model of full employment, increasing unemployment and precarious work conditions have contributed to transfer discrimination from the labour market to the welfare system. But discrimination is not only a result of the design of the system. Discourses about "culturally distinctive features", targeted measures and open discrimination are facing many people with foreign origins and their children (SOU 2006(37): 3).

This way of representing the problem at hand (Bacchi 2009) makes measures targeted at changing individual characteristics among migrants themselves less relevant, while measures aimed at the general population and at discriminatory structures become more urgent. The hitch is that there are fewer policy tools available when the problems to be attacked are either the inherently discriminatory characteristics of the welfare state itself, or mental predispositions in the general population. The welfare state is, put crudely, better equipped to offer training programmes or modify work incentives than to reform racialised cognitive scripts.

The change in government from social democracy to a centre-right coalition in 2006 boded for a new approach to integration and diversity policy also in Sweden. The Liberal Party, with its integration minister Nyamko Sabuni, was strongly committed to an integration-through-work approach and had prior to the election argued to strengthen the duty element of integration policies, for example by advocating a language requirement for new citizens. Talk of structural discrimination has abated as efforts to promote labour market integration have taken centre stage (Brekke & Borchgrevink 2007). Or as the Government formulated it in a strategy document: "The main emphasis is on measures that ensure growth in the supply and demand of labour, and that improve the match between available labour power and the demands of the labour market" (Skr. 2008/09: 24). However, the new Government has continued the earlier line of targeting special measures only at the newcomers – it even closed down the directorate for integration – and using general policies as its main tools for integration.

6 The good, the bad, and the middle of the road or converging divergences?

We started out by outlining four different perspectives on the relation between immigration and the welfare state. The first focused on economic sustainability, the next two on social cohesion and the effects of immigration on public opinion and welfare state support, while the fourth looked at the allegedly poor policy outcomes for migrants themselves of multiculturalist policies in combination with a generous welfare state environment. None of the authors cited have looked specifically at the Nordic welfare state model. Perhaps they should have. The coexistence of fairly similar welfare policies, labour market structures, and immigrant population composition, combined with divergent approaches to integration and multiculturalism, and the Scandinavian countries' impressive base of register data, should provide researchers with material for a more controlled "natural experiment" than Koopmans, for example, has available for his North-West European comparison. However, detailed comparative analyses of how immigrants in the three countries fare on significant welfare variables are few and far between, thus making it difficult to judge relative integration success between the countries.⁶ Neither have comparative analyses of economic sustainability been undertaken. As our interest in this paper (as well as general expertise) is in the historical development of immigration and welfare policy, we can only hope and encourage other and more quantitatively inclined scholars to take up this challenge.

By way of introduction we painted a picture of the three Scandinavian countries' approach to the integration of newcomers as the liberal Sweden, restrictionist Denmark, and Norway somewhere in the middle. This image seems to be substantiated by the type of public and political discourse that predominates in the three countries. Denmark has been marked by rhetoric of cultural clashes, at times with strong anti-Islamic traits. This tendency to blame migrants' culture for integration problems stands in stark contrast to the discourse on structural discrimination and racialisation that has gained a prominent position in Sweden. The Norwegian response seems to have been to look at, but find the policies of both neighbouring countries too extreme and instead adopt moderated versions.

With the danger of oversimplifying, we could say that the Swedes have blamed racism; the Danes have blamed the generosity of income transfers; while the Norwegians have blamed the quality of services. The relatively weaker emphasis placed on sanctions-backed activation policies for migrants in Sweden can be understood in relation to the dominant modes of explaining migrant marginalisation in the Swedish discourse. The welfare state's mechanisms of structural and institutional discrimination have become focal points in several policy papers and official reports, and this makes measures targeted at changing individual characteristics among migrants themselves less relevant than measures aimed at the general population and at discriminatory structures. However, this is changing

and the current government seems more strongly committed to an integration-through-work approach. The Danish discourse in contrast has had a much stronger economic angle, the relevance of discrimination is clearly acknowledged, but focus has also been on the poor work incentives immigrants face in a generous welfare state where they are excluded from the more well-paid segments of the labour market. The Norwegian approach can be characterised as a rights *and* duties approach. There has been a clear rhetorical emphasis on the duties of migrants to actively make an effort to qualify themselves for employment and social participation. However, this has also been presented as a reform and improvement to the welfare services newcomers had been offered in the past. It is not so much the lack of incentives to find work that has been emphasised in the policy discourse, but the lack of training programmes for newcomers, which are sufficiently intensive, work orientated and adapted to the needs of each individual's goals and abilities.

However, the good, the bad and the middle of the road picture may be too simple. The element of force has clearly been weaker in Sweden, but the alternative formulation of this is that newcomers' *rights* to basic training have been weaker in Sweden than in the neighbouring countries. This is where the good and bad images start to become a bit blurry. Furthermore, in Denmark too, discriminatory processes in the labour market are widely acknowledged, and Sweden is in the process of devising more effective introductory programmes to increase new migrants' employability. As noted, Danish migration scholar Ulf Hedetoft describes the Swedish–Danish relation as one of practical convergence and discursive divergence (Hedetoft 2006: 401). While the dominant discourses differ in many respects, in both countries and in Norway, the labour market is increasingly pictured as *the* pivotal arena for integration. Policies are being directed into achieving this aim, although there are variations in the mixture of sticks and carrots that are being employed. Finally, the practical outcomes of 40 years of integration policy are not so different, at least when concentrating on the broad picture. All three countries are marked by comparatively large negative gaps between the labour force participation rates for immigrants compared to natives (OECD 2007). And when migrants do enter the labour market, many remain in its marginal sector with temporary contracts in low-skill jobs, often moving between jobs and labour market programmes rather than in an upwardly mobile career (Djuve & Kavli 2007). This again has implications for their use of and dependency on public income support and for living conditions generally.

The sense that integration has failed seems to be shared in all countries, and this is a diagnosis that has led to policy change. In this sense, Scandinavian politicians seem to be more pessimistic than Banting and Kymlicka's analysis suggests that they should be. On the other hand, these authors' optimistic perspective too, which insists on the universal and generous welfare state's ability to protect against the potentially detrimental effects of immigration, concurs that this hinges on such welfare states' future ability to actually *include* also migrants (Banting & Kymlicka 2006: 42–43). On this, all the

perspectives are in agreement; the disagreement concerns the ability of the generous welfare state and/or multicultural policies to achieve this aim.

None of the four perspectives introduced at the start of this paper pay much attention to welfare policy *change*. However, this historical analysis of the Scandinavian welfare states' approach to immigration demonstrates that Scandinavian policy on the integration of immigrants has changed quite considerably in the decades since the advent of the new post-war immigration. While maintaining a common grounding in the Nordic welfare model, the three countries have gone through a process of divergence, in the sense of adopting different approaches to integration and multiculturalism – institutionally and ideologically. In the past 20 years however, we also see a process of convergence in this field. The logic of the *active* welfare state is entering the realm of integration policy in all three countries, although there is still considerable variation – particularly in the degree to which they have made access to citizenship dependent on performance.

To understand the different routes the push for change has taken in Scandinavia, the country-specific party political constellations – the role of the right in particular – should be taken into account. Growing support for right-wing parties is in the migration/welfare state literature often taken as a sign of welfare state roll-back (Alesina & Glaeser 2004: 177). However, in the Scandinavian context it is essential to note that the radical right can be in favour of considerable levels of social spending. As such these parties are not necessarily anti-welfare, but promote different policies for the distribution of welfare – including cutting down on the spending that directly benefits migrants (Andersen 2006).

The three Scandinavian countries have very different experiences with radical right-wing parties. The multiculturalist model Sweden chose early on was soon modified, but its ideals of tolerance and the self-image it gave rise to survived. While there is evidence of considerable resistance to immigration in the Swedish population, no political actors have been willing or able to take advantage of these sentiments – at least until recently. With no real competition from the radical right, as in Denmark and Norway, the other parties had less reason to demonstrate “toughness” on immigration in order to stem the loss of voters. Denmark, on the other hand, had a vocal anti-immigrant party already in the 1970s. The country was reluctant about institutionalising integration policy as a distinct policy field, preferring to expand general welfare state solutions for all. When the extent of the integration failure as well as the depth of popular and political dissatisfaction with the situation became apparent in the 1990s, authorities could start with a blank slate, erecting new institutions and legislation rather than adapting former ones. The Danish social democracy was from early on divided on matters of immigration and integration. Coupled with the strength of the anti-immigrant right this laid the ground for a stronger politicisation of immigration/integration than in Sweden. In Norway too, the level of politicisation has been higher than in Sweden, thanks mostly to the success of the anti-immigration Progress Party in the mid-1980s but especially since the mid-1990s. However, the Progress

Party has had ambitions of being more than an anti-immigrant party, and its rhetoric is also less nationalist in its orientation than the Danish People's Party. It has had indirect influence on immigration policy in the sense that it has put the issue on the agenda, but – in contrast to its Danish counterpart – it has never been a formal coalition partner or reliable support party for any government, thus exercising little direct influence over policymaking in this field.

Debates on immigration and integration tend to be deeply moral, constantly hinting at the normative appropriateness of policies and practices. In such debates the Scandinavian countries have often ended up being depicted far from each other at a normative continuum, with Denmark at the *bad* side, Sweden on the *good*, and Norway in a pragmatic middle position, trying to tighten control, but without being willing to take it as far as the Danes. However, whether policies are good or not cannot merely be a reflection of what they set out to do, but also of what they achieve. Looking at the results of the past 40 years of efforts to include migrants into Scandinavian labour markets and other vital social arenas, it is far more difficult to make moral judgements.

Acknowledgements

This article is the result of a research project in which many people other than the authors have taken part. *Velferdens grenser. Innvandringspolitikk og velferdsstat i Skandinavia 1945–2010* is a collaborative effort between the authors, Karin Borevi, Heidi Vad Jønsson, and Klaus Petersen, funded by the Norwegian Research Council's programme for welfare research. In particular, in our depictions of Sweden and Denmark we have relied extensively on Borevi, Jønsson, and Petersen's contributions to the project.

Grete Brochmann is professor of sociology at the University of Oslo. She has published several books and articles on international migration: sending and receiving country perspectives, EU policies, welfare state dilemmas, as well as historical studies on immigration. She has also been involved in a number of international research projects and evaluations. She has been lecturing internationally for many years, and has served as a visiting scholar in Brussels (Louvain la neuve), at the University of Berkeley, California, and at Boston College, Boston. In 2002 she held a visiting professorship in honour of Willy Brandt in Malmö, Sweden.

Anniken Hagelund is a sociologist and senior research fellow at the Institute for Social Research in Oslo. Her main research interests revolve around immigration and integration policy and welfare policy. Recent publications include articles in journals such as *International Migration* and *Journal of European Social Policy*, and a book on immigration and the Nordic welfare state (with Grete Brochmann).

Notes

- 1 Taylor-Gooby (2005) makes a similar point.
- 2 The 24-year age threshold for transnational marriages means that family unification between youth settled in Denmark and foreign residents can only take place if both parties have reached 24 years of age. The idea is that people will be more vulnerable to possible pressure from parents and family to marry, and thus more susceptible to accept an arranged transnational marriage, when they are younger. As they grow older and gain more education, and financial and emotional independence, they will be more able to resist such pressure. In a later memorandum to the Council of Europe's commissioner for human rights, the Government also states that the rule promotes "better integration, because it contributes to improved educational and work opportunities for young people" (see Hagelund 2008).
- 3 In Norway means-tested social assistance is organised and funded by municipalities, while rights-based income support is funded directly by the state. For local authorities it is thus better to have residents on, for example, state-funded unemployment benefits than on social assistance.
- 4 An extension to 600 hours will probably be approved shortly.
- 5 Available from: <<http://www.regjeringen.no/nb/dep/aid/presse-senter/pressemeldinger/2009/pm/mandat.html?id=560655>>. [Last viewed 13.08.2009].
- 6 One exception is Blume *et al.* (2007) who finds that poverty increasingly is an immigrant phenomenon in both Sweden and Denmark, but that poverty rates are higher among immigrants in Denmark than in Sweden. This has partly to do with differences in the composition of the immigrant populations, but is also explained by the structure of the income support system where the Danish system is more favourable to the typical native small family while families with many children fare better in Sweden. See also Morrisens & Sainsbury 2005.

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