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## 5 Migration, Multiculturalism and Gender – a Nordic Perspective

Migration and multiculturalism represent new challenges for the Nordic countries in terms of welfare, democracy and citizenship. The countries are often believed to belong to the same welfare and gender systems with a strong tradition for social rights and gender equality and a relatively weak tradition of diversity. However, the countries have different histories and institutions and have recently developed different approaches and policies towards migration and integration of ethnic minorities. Sweden has adopted the most multicultural policies, while Denmark since 2001 has adopted relatively restrictive policies (see Hedetoft et al 2006), with Norway and Finland positioned somewhere in between in terms of regulation and discursive framings of migration and integration policies. Nordic research suggests that in spite of these differences the countries face similar challenges in attempting to include immigrants and minorities as equal citizens in the labour market, in democracy and society (Brochmann and Hagelund 2005).

Power is multidimensional and includes the power to (re)define what democracy, social justice and gender equality should be under the present conditions of globalisation and migration. Gender equality has today become a widely accepted principle, and the growth of many types of feminisms – post-structural, post-modern and post-colonial feminism – have made visible that there is no longer consensus about what is best for women or about strategies to empower women (Mulinari et al. 2009). The ‘turn to diversity’ in research is similar to the strong emphasis in gender theory and research on intersectionality, which is to say, studying how gender intersects with ethnicity/race and other kinds of inequality creating complex social categories (Yuval-Davis 2006; Squires 2007).

Migration and multiculturalism have become highly politicised. Research has demonstrated that gender equality in many European countries, is being instrumentalised by political anti-migration forces on the Left and the Right, to, for example, argue against a patriarchal and oppressive Muslim culture (Kilic et al. 2008; Lombardo and Verloo 2009). This is also the case in the Nordic countries where scholars have noticed that the dominant ‘victimisation discourse’, which contrasts gender equality in the (white) majority with the oppression of women in the Muslim minority, resonates especially well with the Nordic gender system (Gullestad 2006; Christensen and Siim 2009).

This paper first briefly revisits the academic debate about gender equality and multiculturalism. Multiculturalism has been accused of being gender-blind, and the debates have illuminated the tensions between multiculturalism and gender equality (Okin 1999). Multicultural approaches have focussed on the accommodation of diversity as the key concept (Modood 2007), while feminist approaches have focussed

on gender (in)equality as the key concept (Phillips 2008). The two bodies of thought have thus addressed different problems but there is a growing interest on both sides in exploring complex diversities (Kraus 2009) and multidimensional inequalities, i.e. the intersections of different kinds of differences and inequalities (Yuval-Davis 2007; Lombardo, Meier and Verloo 2009). Arguably, perceptions of diversity and gender equality/women's rights are contextual and dynamic, and intersecting diversities and inequalities are embedded within national histories, institutions and policies (Lister et al. 2007; Yuval-Davis 2007; Lombardo, Meier and Verloo 2009).

Secondly, this paper explores 'the multicultural dilemma' from a Nordic perspective focussing on the intersections of gender with ethnicity/race and religion. It looks at the criticism of the Nordic welfare state, in particular its integration and gender equality policies from the perspective of immigrant women. During the last 30 years, the discourse surrounding women's rights and gender equality has become an intrinsic part of Nordic national identities and belongings (Gullestad 2006; Melby et al. 2008). The welfare states have been labelled 'women-friendly' due to the high level of women participating in the labour market, education and politics, the system of public childcare and parental leave, as well as extended gender equality legislation in these countries (Borchorst and Siim 2008). The women-friendly social policies and practices were linked to a strong Nordic state feminism, which has empowered women as workers, citizens and mothers. However, the Nordic welfare states have been criticised by feminist scholars for being blind to the cultural diversities among women (los Reyes, Mulino and Mulinari 2003; Borchorst and Siim 2008).

On this basis the third section gives a more detailed account of how the principle of gender equality is balanced with ethnic and religious diversity by looking at the headscarf debates and regulations in the three Scandinavian countries. It first compares the difference in the regulation and framings of arguments on the Danish and Norwegian labour market sites which involved a conflict between two liberal principles: the freedom of religion versus employers' power to determine the dress-code of employees. In spite of similarities the reasoning and rulings in the two cases turned out to be different (see Siim and Skjeie 2008). In the Danish case the power of employers overrode arguments for freedom of religion, while it was the other way round in the Norwegian case. The Swedish case is different, because it concerned conflicts around the prohibition of veiling in public institutions between educational institutions, which wanted to prohibit the burka/niqab and the Swedish board of Education. Here the 'freedom of religion' argument also prevailed (see Lanefelt 2010). This section discusses the meanings and implications of these differences for gender equality and accommodation of diversity.

The final section sums up the dilemma between multiculturalism/diversity and gender equality from a theoretical perspective as well as from the Nordic context. It argues that demands for gender equality and for accommodation of religious and cultural diversity are not deep value conflicts but contextual conflicts which represent equally valid principles that need to be balanced against each other in

liberal democracies. From the perspective of deliberative democracy women in minority groups should participate in negotiations concerning different claims to social justice.

How are claims for diversity and gender equality balanced in the Nordic countries? In this political-institutional and discursive context, claims about gender equality and women's rights have traditionally been more powerful principles than claims for accommodation of immigrant and minority groups. The present marginalisation of immigrant groups in the labour market and their relative powerlessness in democratic politics represent problems for the welfare states, which need to be addressed by innovative 'diversity politics'. Immigrant women present specific challenges to the Nordic welfare states that often praise themselves for being a model for gender equality. It is a common challenge for Nordic welfare states to develop more inclusive integration strategies that are able to overcome the inequalities in power and resources between the native majority and immigrant groups, which include seeking to locate ethnic minority groups on an equal par with the native majority.

## 5.1 Rethinking citizenship and diversity

Immigration and mobility across and within national borders has challenged the nation state and raised critical questions about citizenship, national communities and belongings. Migration has been followed by growing concerns about the integration of immigrants and refugees in the national communities where they have settled and about cultural conflicts between old majorities and new minorities. Questions related to citizenship, migration and the politics of belonging have become crucial political issues across Europe. The citizenship approach has illuminated the tensions in liberal democracies between concerns for equality/gender equality on the one hand and accommodation of religious and cultural diversity on the other hand (Lister et al 2007; Modood et al 2007; Siim and Squires 2008).

The citizenship frame has addressed issues of exclusion and inclusion of individuals and social groups in society. Key questions are: who is included and who is excluded – who is defined as being 'inside' national communities and who is defined as being 'outside'. In T.H. Marshall's classical citizenship model equal civil, political and social rights for all people legally living in the country were attached to the nation state (Marshall 1950). Within this citizenship tradition scholars often distinguish between three dimensions: a) equal status, rights and obligations; b) political participation and citizens' voices and c) political identities and belongings (Bellamy et al. 2003). The focus in the classical model on the inclusion of the working class in society has been criticized from a gender and diversity perspective, and the citizenship approach has subsequently been redesigned to address the inclusion/exclusion of women and marginalised social groups in society (Kymlicka 1995; Lister 1997).

Globalisation, Europeanisation and increased migration and mobility across and within borders have challenged the classical citizenship model attached to the nation state. Claims for the recognition of diversity has raised new issues about the state's obligation to respect ethno-national and ethno-cultural rights of minorities (Kymlicka 1995; Eisenberg et. al 2005). One position, held by for example Will Kymlicka (1995), has criticised the primary focus on equal rights and has proposed new multicultural models, which recognise the ethno-cultural and ethno-national rights of minorities. Meanwhile, Soysal (1994) for example, has criticised the nation state bias of the citizenship approach and has proposed new post-national citizenship models.

Comparative research has explored the contextual nature and routes to citizenship and has identified citizenship regimes with different political opportunity structures and discursive framings of equality and diversity (e.g. Koopmans and Statham 2000; Bellamy et. al. 2003). Research has explored the historical roots, institutional variations and cultural meanings of gender, race/ethnicity and class (in)equalities according to processes of inclusion and exclusion cross-nationally. A key issue is how policies and discourses affect citizens' individual and collective identities/belongings as well as their practice. In this context citizenship concerns more than rights and obligations, since the notion of 'lived citizenship' refers to 'a set of social and political relationships, practice and identities that together can be described as a sense of belonging' (Lister et al. 2007:9).

The idea of the nation/nation state as an 'imagined community' was introduced by the American scholar Benedict Anderson, who defined the nation as imagined 'because the members of even the smallest nation will never know most of their fellow-members, meet them, or even hear of them, yet in the minds of each lives the image of their communion' (Anderson 1983:15). Nira Yuval-Davis has redefined the linkage between citizenship and national belongings from a gender perspective. The influential book *Gender and Nation* (Yuval-Davis 1997) offers examples of how the creation of identity politics has been used to exclude specific groups while showing how gender has helped define the nation as an imagined community, for example via arguments of origin, kinship, culture and religion. Yuval Davis has also recently explored the notion of belonging as a way to enrich and clarify discussions of contemporary citizenship and has proposed a 'multi-layered citizenship' model (2007). The main argument is that people are no longer connected primarily to the nation state but are simultaneously citizens in more than one political community.

Yuval-Davis' approach is based upon an analytical separation of 'belonging' and 'the politics of belonging'. 'Belonging' refers to emotional attachment and about feeling at home and feeling safe, whereas 'politics of belonging' refers to 'specific political projects aimed at constructing belonging in particular ways to particular collectives that are, at the same time, themselves being constructed by these projects in very particular ways' (Yuval-Davis 2006a:197). In other words, 'politics of belonging' is basically about demarcations of who is 'in' and who is 'out' of communities. According to Yuval-Davis, analyses of 'belonging' must be founded

on an intersectionality perspective, which analyses how gender intersects with other kinds of inequalities and diversities. Yuval-Davis emphasises that:

*There is no meaning to the notion of 'black', for instance, which is not gendered and classed, no meaning for the notion of 'women', which is not ethnocided and classed, etc. This is a very important point when we discuss issues of citizenship and belonging, because so much of the discussion on these issues, inspired by identity politics, attempts to homogenize the differential meanings of such identity notions such as blacks or women, etc. (Yuval-Davis 2007:565-66).*

I find that the intersectional approach to citizenship is a methodological approach for studying gender and diversity, because it addresses the interrelations between inclusion and exclusion of gender and marginalised groups. National histories, political institutions and belongings affect both the meanings and interactions of the social categories, e.g. gender, race/ethnicity and class, but national models often fail to overcome the nation state bias of the citizenship approach. One of the challenges for the citizenship approach is therefore to move 'beyond the nation state' both in terms of a conceptual move (Beck 2002) and in terms of exploring citizenship at the transnational level, e.g. EU-citizenship (Faist 2007).

## 5.2 Multicultural citizenship and gender equality

This section looks at the challenge of 'the turn to diversity' for gender theory and research and discusses feminist approaches to overcome the unitary bias in social and political theories (Squires 2007). It is inspired by Ange-Marie Hancock's (2007) distinction between *unitary, multiple and intersectionality* approaches to difference and diversity, which is used to categorise the different models. *Unitary* approaches address one primary category, for example gender, race/ethnicity or class, and tend to neglect other kinds of diversities and inequalities. *Multiple and intersectional* approaches both address more than one category and the categories matter equally; but in the multiple approach the categories have a predetermined relationship to each other, whereas the relationship between categories is an open empirical question in the intersectional approach (2007:64).

The debate about multiculturalism was particularly sparked by Will Kymlicka's influential book *Multicultural Citizenship* (1995). The book presented one of the most comprehensive multicultural approaches, and introduced a strong defense for the accommodation of the cultural diversity of minority groups. Kymlicka's concept of multicultural citizenship (1995) distinguished between three forms of group-differentiated rights: a) *self-governing rights* for national minorities, b) *poly-ethnic rights* for ethnic minorities, and c) *special representation rights* for historically disadvantaged groups. The later notion of 'diverse citizenship' (Kymlicka and Norman eds. 2000) proposes a comprehensive model for accommodating different types of minorities. Kymlicka's model was criticised for defending group rights and for not

addressing diversities and inequalities related to gender (Okin 1999) and religion (Modood 2007).

Tariq Modood (2007) has criticised Kymlicka's approach for a liberal bias and for the dominant focus on national minorities. He has introduced an alternative conception of political multiculturalism based on the ideas of 'difference', 'multi', 'equal dignity' and 'equal respect'. Modood's is interested in the accommodation of religious groups. He emphasises the novelty of the ethno-religious mix in European democracies and the need to include Muslims in contemporary conceptions of democratic citizenship at the level of 'identities, associations, belonging, including diasporic connexions, behaviour, culture, religious practice etc., and political mobilization' (p.50). It is the focus on religious groups, which makes Modood's approach unique, whereas the argument that accommodation policies must recognise groups, not just individuals, is similar to Kymlicka's approach.

Kymlicka's multicultural paradigm was criticised by feminists because it neglects gender differences. Susan Moller Okin claimed in an influential article titled: 'Is multiculturalism bad for women?' (1999) that there is a contradiction between multiculturalism, defined as protection of the cultural rights of minorities, and women's rights. The article provoked an intense debate in the US (see Cohen 1999), which later spread to Europe (Eisenberg 2005). Her main point was that minority groups often have patriarchal religious and family structures, and therefore should not be defended as a strategy to achieve gender equality and improve women's rights. The claim is that group rights, exemplified by forced marriages and polygamy, are potentially, and in many cases also in practice, anti-feminist and harmful for women. First, group rights strengthen men's patriarchal control over women in minority cultures, and secondly it is the most powerful men who formulate the interests, values and practices of the group.

Okin's approach was read by many as a 'liberal defense' of universal gender equality against cultural diversity. The attack on the multicultural paradigm was criticised as being premised upon an essentialist perception of 'culture' which would force minority women to choose between 'my rights and my culture'. Okin later clarified her position explaining that she is not against collective rights *per se* and that the main point had been to give women a voice in all negotiations about groups rights (2005:88-89). The debate inspired a growing emphasis on both 'the paradox of multicultural vulnerability', i.e. the idea that vulnerable social groups' needs and interests can be undermined by group rights (Shachar 2000:200), and on giving women and other vulnerable groups a voice in both minority cultures and in society (see for example Eisenberg et al. 2005; Modood et al. 2006).

In a response to this criticism, Kymlicka stressed that states should only protect the collective rights of minorities through *external restrictions* on the majority, for example through representation rights and language rights, but states should *not* defend collective rights that impose *internal restrictions* of individual rights/autonomy within the group (1999:31-34). He argued that feminism and multiculturalism are

potential allies in a struggle for a more inclusive concept of justice which combines individual and collective rights and takes account of both gender-based and ethnic diversity.

Anne Phillips (2007) has also argued that egalitarians should be committed to both sex equality and at least some version of multiculturalism and has introduced a deliberative 'diversity model' without culture and without groups. The argument is that rights should be attached primarily to individuals and thus the main problems concern discrimination: 'the multicultural question is – whether existing legislation is biased towards the cultural identities or religious beliefs of particular groups. Laws and rules that enjoy majority support may reflect a cultural bias' (2007:166). This is a controversial model premised upon individual rights and aims to abolish collective rights of cultural groups.

Thus, multiculturalist and feminist approaches present competing equality claims, but conflicts between claims for gender equality and recognition of religious diversity, around veiling for example, should not be regarded as deep values. They are contextual dilemmas, which may be resolved through democratic negotiations with the participation of women from minority groups. Okin's approach to women's rights can be categorised as a unitary approach, because gender is the main category. Will Kymlicka and Anne Phillip's approaches to accommodate national minorities, immigrant groups and gender are multiple approaches, which focus on at least two categories. Only Yuval-Davis' citizenship model is explicitly intersectional, and the relationship between the categories gender, ethnicity and nationality, is an open empirical question dependent on time and space. The next section addresses the multicultural challenge to gender equality from a Nordic perspective and discusses in more detail how gender intersects with ethno-cultural and ethno-religious diversity in headscarf debates.

### 5.3 The multicultural challenge<sup>1</sup> to the Nordic welfare states

In comparative research the Nordic countries are often considered to belong to the same welfare and gender model characterised by a large and generous public sector, a high level of universalism and many tax financed benefits. In spite of these similarities the Nordic countries have different histories and experiences with immigration and have adopted different approaches and policies towards migration and integration.

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<sup>1</sup> The multicultural challenge refers to the accommodation of diversity at the structural, institutional and individual level. Ulrich Beck (2002) has explored the multicultural dilemma at the individual level where multiculturalism 'fosters an individual who remains dependent on his/her original cultural space'. He has analysed the 'local-global dilemma and Beck's notion of 'internal globalization' is presented as a way to connect the dilemmas associated with globalization and migration.

Sweden has a history of work-related immigration since the 1960s, while Finland was a country of emigration (especially to Sweden) until the 1980s, and has had restrictive migration and refugee policies even in the 1990s and 2000s.<sup>2</sup> Denmark's immigration was also work-related in the 1960s but the country adopted a stop for immigration in 1973; Norway experienced immigration from Third-world countries at the end of the 1960s but imposed an immigration ban in 1975. A study on the challenges to the Nordic welfare regimes from migration, for the Nordic Council, indicates that in spite of these differences in governments' policies and discourses towards immigration, there are similar problems with discrimination and failed integration of immigrants in the labour market and in society (Brochmann and Hagelund 2005).

The three Scandinavian countries have been interpreted as one welfare model with three exceptions (Brochmann and Hagelund 2010). Comparative research from the three Scandinavian countries has started to explore the different policy responses to the challenge from migration and diversity: The multicultural Swedish model represents a relatively accommodating response towards diversity, which is often contrasted with the restrictive Danish response; while the pragmatic Norwegian response is positioned somewhere in between (Hagelund 2009). Recent Danish-Swedish comparisons of policies and discourses indicate that the framing of the issues, i.e. whether public and political discourse label diversity as a threat or an asset and whether the political majority manages to frame ethnic minority groups as some of 'them' or as part of 'us', instead of perceiving diversity as an asset, is one of the key factors in shaping public policies (Hedetoft, Pettersson and Sturfelt 2006). The studies conclude that while the integration discourses and policies are divergent there may be an actual convergence in the practical effects of integration policies (Hedetoft 2006:406). The Nordic Report on the welfare political consequences of immigration has demonstrated that there is a growing emphasis on labour market participation as the route to integration in all the Nordic countries (Brochmann and Hagelund 2005:2010).

There are, however, still important differences. The Swedish activation programmes tend to be general and voluntary based upon 'an individual rights model' (Borevi 2010), whereas the Danish integration programmes since 2002 have been premised upon 'an individual obligation model' with economic sanctions that target immigrant groups (Emerek and Bak Jørgensen 2009). One example is the Danish introduction benefit 'starthjælpen', which is targeted towards new immigrants and is lower than the social benefit 'kontanthjælpen' directed towards Danish citizens.

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<sup>2</sup> In 2005 Finland's foreign population from countries outside the EU, the Nordic countries and North-America, were only 3.4 per cent of the total population, while Sweden's foreign population ratio was 12.4. Denmark and Norway were in between with a medium-size foreign born population ratio of 6.5 and 7.8 respectively. The largest immigrant groups in Denmark, Norway and Sweden come from Turkey, Pakistan and Ex-Yugoslavia (Brochmann & Hagelund 2005).



This differentiation with regard to nationality is a break with the key principle in the universal welfare state which treats all individuals equally. Another example is the so-called '300 hour rule' which is targeted towards married couples and providers above the age of 25 who have received social benefits during the last 2 years. They will lose the right to social benefits if they have not been employed at least 300 hours (later raised to 450 hours) during the last 24 months. This rule has been heavily criticised for targeting the most vulnerable groups, especially immigrant women, but the Government insists that it is a necessary economic sanction/inducement in order to integrate migrants within the labour market. What have been the effects of these policies is highly contested, whether they have been a success or a failure in terms of integration of migrants into the labour market (Jönsson and Petersen 2010:200-209).

In the comparative book *The Limits to Welfare* (2010) Brochmann and Hagelund argue that the founding and evolution of the Nordic welfare states can be interpreted as a 'welfare nationalism' based upon integration with three central elements: democracy, citizenship and modernisation. The book studies differences and similarities in the interactions between the welfare state and the new immigrants to Denmark, Norway, and Sweden. The focus is on both the policy shifts towards immigrants from WWII until 2010, and on intended as well as unintended effects of the interactions between policy changes in the three countries. One example is the unintended consequences of the adoption of restrictive immigration policies by the newly elected Danish government in 2001 which greatly increased the number of immigrants to Norway and Sweden.

Karen Borevi (2010) has analysed whether Sweden is an exception to the general retreat from multiculturalism with an emphasis on national cohesion and belonging rather than the accommodation of cultural and ethnic subgroups. She argues that there is a trend towards a greater emphasis on individual obligations in welfare policies. In spite of this, Swedish integration policies still tend to be based on individual 'rights' rather than obligations. Three examples may illustrate how Swedish integration policies differ from the general Nordic (and European) trend: a) Swedish politicians have rejected citizenship tests, i.e. the obligation for immigrants to learn the Swedish language and history as a condition for citizenship; b) the Swedish introduction programmes are still voluntary and not mandatory; and c) immigrants have the freedom to choose where to live (Borevi 2010:116-130).

Brochmann and Hagelund conclude that the most fundamental similarity in the integration approach of the three Scandinavian countries is the emphasis on labour market integration and activation, where the obligation to participate in the labour market has been strengthened. In general all three countries conform to the ideal of civic integration, but the countries are clearly distinguished in terms of their official requirements for immigrants. Only in the case of Sweden do rights clearly come before duties, as in Marshall's theory, the most explicit differences can be found at the political-ideological level: Sweden has the clearest redefinition of a demos-based nation-state, with, for example, the right to dual citizenship.

This contrasts with Denmark, which between 2001 and 2005 has experienced a shift towards ethnos, with 9 years residence as a condition for citizenship, for example. Norway has an unclear middle-position in terms of official requirements for immigrants (Brochmann and Hagelund 2010: 356-357). It is however, not evident what the implications of these political-ideological differences are in practice. Accommodative cultural policies do not always lead to successful integration in the labour market. Research indicates that there may be unexpected consequences of both the individual rights based Swedish policies, which may be ineffective in terms of economic and social integration, and the restrictive Danish policies based upon individual obligations, which may prove to be effective. The three countries are today *de facto* multicultural countries, which are presently forced to re-define the national welfare projects faced with global mobility and a growing demand for labour power. The comparative analysis demonstrates that traditional welfare state policies have not been successful in developing equality based policies towards new immigrant groups (Brochmann and Hagelund 2010:367).

There is clearly a basis for more comparative Nordic research, which explores the interconnections between discourses, policies and the implications for the daily lives of immigrant groups. The following section focuses on the meanings and possible implications of the challenge from migration/multiculturalism for the intersections between gender equality and ethnic diversity.

## 5.4 The Nordic gender equality paradox

Feminist scholars usually agree that the Nordic countries, in spite of their differences, share basic characteristics that make it meaningful to include them in the same gender model. Comparative research often emphasises that the countries share basic characteristics: 1) a dual breadwinner model combined with a system of public childcare services and generous maternity- and parental leave, 2) a relative high number of women in the national political elite, and 3) a strong discourse about gender equality as both part of public policies and the private lives of citizens (see Bergqvist et al. 1999). Increased migration has raised concerns about new forms of inequalities between native born and foreign born women and has questioned the Nordic gender model's ability to accommodate diversity among women.

Immigrant women are often said to present a special challenge for Nordic governments because of their low labour market participation compared to women in the ethnic majorities, which for several decades have had record high employment rates within the OECD area. As an example, in Denmark the present Liberal-Conservative government has gradually tightened immigration laws using gendered issues like forced marriages to legitimise a stricter immigration control in relation to family members (Emerek and Bak Jørgensen 2009). Gender equality has thus come to play a key role in the dominant discourse about integration, and the perceived gender

equality in 'ethnic Danish families' is increasingly contrasted with the supposed patriarchal oppression of women in 'migrant families' (Siim 2007; Siim and Skjeie 2008).

Feminist scholars have criticised women-friendly welfare policies for being premised upon women's common social positions and interests (Borchorst and Siim 2002; 2008). Gender equality policies have been criticised for neglecting diversities between women from the white majority and the ethnic minorities, thus making alternative perspectives on gender and family relations invisible (los Reyes, Molino and Mulinari 2003; Langvasbråten 2008). Post-colonial theory has criticised the hegemonic trend in Nordic gender and ethnicity research, especially the (colonial) desire to know the 'other' (Mulinari, Kaskinen, Irni and Tuori 2009) and produce a hegemonic picture of gender and femininity that makes power inequalities between the 'white' majority and immigrant women invisible (de los Reyes, Molino and Mulinari 2003:31; Andreassen 2005). Postcolonial feminism has recently labelled Nordic nationalism 'welfare state nationalism'.

Feminist research has started to analyse inequalities between majority and ethnic minority groups in terms of power and influence. One central issue concerns the powers to define gender equality and feminism (Pristed and Thun 2010). The perceived conflicts between the dominant norms about gender equality and the cultural norms of immigrant families, including the diversity of family norms has recently become a central issue in feminist research (Bredal 2006; Siim 2008). Scholars have started to analyse the meanings and implications of the diverse Nordic welfare, migration/integration and gender equality policies for immigrant and refugee women's lived citizenship. How should we assess and compare the national difference in gender equality policies towards immigrant women? For example, what about the differences between Swedish equality policies, which have generally been directed towards all women independent of their ethno-cultural background (Langvasbråten 2008), and Danish gender equality policies, which are targeted towards immigrant women, who are perceived to be oppressed by their culture and their religion? (Siim 2007) What strategy is more effective for empowering ethnic minority women in relation to employment and education?

To sum up, immigration has increased inequalities among native and foreign born women and has challenged the Nordic welfare states' self-understanding as the normative models for gender equality. Instead of Helga Hernes' grand vision of a society 'Where injustice on the basis of gender would be largely eliminated without an increase in other forms of inequality, such as among groups of women' (1987:15) research has pointed towards the new inequalities among women. Siim and Skjeie (2008) propose that the new forms of inequalities among women represent a Nordic gender equality paradox between the white majority who are included in politics and society and ethnic minorities who are marginalised both in the labour market and in politics.

## 5.5 Framings and regulations regarding headscarves in Nordic nations

The purpose of this section is to look at framings and regulations of Muslim headscarves in the private and public arenas in more detail within the three Scandinavian countries.<sup>3</sup> Denmark, Norway and Sweden have many similarities in terms of citizenship and none of them fit any of the classical citizenship models: the ethno-cultural model, the civic-assimilationist or republican model, and the multicultural model (Kilic, Saharso and Sauer 2008). One clear indication of differences in the countries' migration policies is that Sweden is the only country that has adopted dual citizenship (in 2003) in order to strengthen integration. The countries also have different state-church relations since Sweden decided to separate state and Church (in 2001), while both Denmark and Norway have retained their state churches. In spite of these differences in citizenship policies, research has pointed out that all three countries have retained relatively accommodating approaches to political regulation of veiling in the public arena compared to other European countries (Kilic, Sauer and Saharso 2008).

The first Danish and Norwegian headscarf-cases addressed the right of Muslim women to wear the hijab to work in private companies.<sup>4</sup> They illustrate that there are important differences in the political and discursive opportunity structures of the two countries which have implications for Muslim women. In the Danish *Føtex* case the conflict was between an employee, Najla Ainuz, who was working as a full-time bakery manager and had demanded the right to wear the headscarf to work for religious reasons, and *Føtex*, which is part of the concern, *Dansk Supermarked*, who dismissed her. The trade union, HK, argued on behalf of the employee that dismissal of the employee made her the victim of religious discrimination. The employer argued that they had the power to dismiss an employee who did not live up to the general dress code of the supermarket, which demanded that employees had to be 'professionally and nicely dressed'.

HK took the case to court twice. In 2003 the High Court ruled that the company's dismissal of veiled employees was legal if the supermarket, in this case *Føtex*, had adopted a universal dress-code for all employees. The High Court reasoned that

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<sup>3</sup> Unfortunately I have not been able to find research about veiling in Finland.

<sup>4</sup> There have been several legal court cases in Denmark. The first case was the *MAGASIN* case, where the department store was sentenced a fine of 10.000 Dkr for dismissing an employee with hijab. The second case was about *TOM's Chocolate Factory* and this ended in reconciliation. The Danish trade union, HK, in Danish, *Handel og Kontor*, has led two cases, the *ALDI*-case, which also ended with reconciliation in 2003 where the employee AC was awarded 30.000 Dkr according to the Danish discrimination Law, and the *FØTEX*-case, which HK lost. The analysis of the Danish court cases is based upon empirical material and research findings from the *VEIL*-project (see Andreassen & Siim 2007; Andreassen, Lund & Siim 2009) and the Norwegian case is based on empirical material and research findings provided by Hege Skjeie (see Siim & Skjeie 2008).

the ban on headscarves must be formulated as part of a general ban on all visible political, religious and cultural symbols and must not be directed towards a specific religious group. *Dansk Supermarked*, which owns the chains *Føtex*, *Netto* and *Bilka*, had introduced clothing regulations in August 2000. These regulations prohibited veiling for employees who are in contact with costumers, i.e. employees working in the store room can be veiled. The clothing regulations also prohibited caps, including Jewish skullcaps (kippas); large Christian crosses; as well as visible piercings or unnatural hair colors. These clothing regulations had been written down and distributed among all *Dansk Supermarked*'s staff during the autumn of 2000, and from August 2000 onwards all new employees had been equipped with a pamphlet describing the clothing regulations. The judges therefore ruled that *Føtex*'s veil prohibition was not a question of discrimination but rather a question of clothing uniform. According to Najla Ainouz's contract from March 1, 2001 (where she was hired fulltime in the bakery) she had signed an agreement with the stipulation that her employment included 'the rules and duties described in the staff regulations'. This meant that, when signing her contract, Najla Ainouz also had accepted that she would observe the requirements proscribed in the staff regulations. In the clothing regulations from August 2000 it says: 'In all areas where there is not a demand for a certain head covering, it is a part of our uniform [that] demands that employees do not wear headgear.' This decision was appealed by the trade union who on behalf of the employee argued that the dismissal on religious grounds was a violation of the Danish Anti-discrimination Law. The verdict was appealed and the case was taken to the Supreme Court, which confirmed the decision in January 2005 (Andreassen and Siim 2007).

The Norwegian cases had many similarities but the reasoning and outcome was different. Here individual cases of veil discrimination were brought before the Norwegian Equality Ombud but were not tried until 2004. The complaint by a number of employees that they were not allowed to wear a headscarf to work resulted in a decision by the Ombud that prohibitions of the veil in work places were in violation of the prohibition against religious discrimination. She added that it would also be an indirect form of gender discrimination, which violated the Gender Equality Act. In determining this, the Ombud compared such restrictions of Muslim headscarves to the contrary accommodating, uniform regulations within the military services (i.e. turbans). She reasoned that many Muslim women wear the veil because of religious reasons and situations could occur where they could not accept to work if they could not use the headscarf. A prohibition would thus entail a significant disadvantage for these women. In more recent decisions the Ombud has upheld this general line of reasoning. A ban of the veil was later tried both according to the Gender Equality Act and a new Act against Ethnic and Religious Discrimination, and found to be a violation on both prohibition grounds (Siim and Skjeie 2008).

In the Danish case the main conflict was formulated as a conflict between two principles: Religious discrimination against the liberal principle that private

employers' should have the power to decide without interference from the state. In the Føtex case the concern for religious rights founded in the Danish Constitution and European Human Rights Convention lost out, probably because the Danish Supermarket chain had adopted new clothing regulations which also forbade caps, including the Jewish kippa and large Christian crosses (in 2003). In the comparison of the two cases, Siim and Skjeie suggest that the Norwegian Ombud's argument is an example of an *inclusionary framing*, which takes the intersecting of gender with religion and culture into account in support of women's right to wear the Muslim Headscarf to work by acknowledging that it is women who wear the veil (see Skjeie 2007; Siim and Skjeie 2008). It is *inclusive*, because it recognises the intersections of different inequality creating categories, and the potential negative consequences of these inequalities for creating equality, in diversity.

What can explain the differences in the reasoning? The comparative analysis suggests that three factors may contribute to explain the different results: a) the pluralist religious tradition in Norway, which does not exist in Denmark, b) the difference between the Equality Ombud which is more sensitive to the arguments from political actors than the legal Court system, and finally c) the mobilisation of social and political actors in Norway, an example being the Muslim women organised in the MIRA-centre (Siim and Skjeie 2008:329-34).

The third case is somewhat different because it addresses the Swedish approach to veiling in public educational institutions and includes conflicts over the burka/niqab (see Lanefelt 2010). It refers to four different cases:<sup>5</sup> 1) The Burgården high-school case, where two female pupils wanted to attend classes dressed in a burka, 2) The Minerva elementary school where the school ordered a pupil to take off her veil on the school premises, 3) the third case concerns two students in the Swedish Institute of Education who wanted to attend classes dressed in niqab, and 4) the Västerort Adult High School case where a women who was not allowed to wear a niqab reported the school for discrimination.

The Swedish Board of Education had the power to decide in the first two cases whereas the third university case was decided internally at Stockholm University. In the Burgården case the Board did sustain the school's decision to forbid wearing the burka for several reasons including pedagogical arguments, practical arguments and a freedom of religion argument. In the Minerva case the Board of Education went against the school's argument for a ban of the veil to allow the wearing of the veil in the specific school. The Board mentioned several justifications but according to Lanefelt the main reason is one of freedom of religion (Lanefelt 2010:6). The third

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<sup>5</sup> The description of the Swedish cases is based upon PhD Lily Lanefelt's PhD-project, especially the arguments in the paper "Regulating the veil in Swedish Style: Tolerance and the Absence of Intersectionality in Public Reasoning on the Issue of Veil", that was presented at the Second DEMDI conference, Oslo, 28-29, 2010.

case, which was decided in the two students' favour, is the only instance where freedom of religion is not given as the reason for allowing the veiled girls to attend classes. Instead the justification refers to equal treatment and to discrimination, which should not occur in the University of Stockholm (SU). The last case is that of Västerort Adult High, where there was no official decision as of January 2010. A preliminary conclusion by the present DO<sup>6</sup> was published on the official website of Swedish communities and county councils. This refers to two arguments: a) freedom of religion and b) equality of opportunity.

The Swedish cases are different from the Danish and Norwegian cases since: a) they address demands to wear the burka and the niqab which are perceived to be more difficult to accommodate than the demand to wear the hijab, b) they concern public educational institutions and not private companies, and c) they were decided by different public authorities. Scholars have debated whether the Swedish policy on veiling should be characterised as 'non-restrictive' or as 'selective prohibition'? Lily Lanefelt takes issue with Kilic, Saharso and Sauer (2008) who have defined the Swedish policy towards the veil as belonging to the selective prohibition based on the decision of the Swedish board of education to support the decision to ban the burka in the Burgården high-school case. According to Lanefelt the Swedish policy on the veil should be categorised as a non-restrictive approach, because the Burgården case is an isolated case and demands for wearing the veil in educational institutions have not been rejected in the other three cases (Lanefelt 2009:4).

Lanefelt argues that there is a primacy of freedom of religion argument in the Swedish cases and that this may have negative consequences for moral reasoning. It is a problem that this policy runs the risk of labelling women wearing the veil as *being unreasonable* since 'a policy of the veil that bases the rationale of non-exclusion of female veiling practices from education to the right of freedom of religion can tend to embrace the negative connotations that religion is assigned when contrasted with reason' (Lanefelt 2010:14). This means that female veiling is assigned only one meaning as a religious symbol and thus the policy neglects the intersectionality of meanings that veiling represents both for women wearing the veil but also the different interpretations that second parties make of veiling traditions. Lanefelt's analysis of the Swedish approach to veiling is interesting, because it focuses on the negative implications and unintended consequences of the de-politicisation of veiling, which fails to address veiling as a controversial normative issue for all parties involved. She suggests that an alternative reasoning would be to acknowledge the intersectional aspects of veiling practices.

To sum up, I agree with Lanefelt that Sweden, like Denmark and Norway, can be categorised as having a relatively accommodating approach to veiling in the public arena. Differences in the political power structures characterised by strong anti-

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6 DO: Diskrimineringsombudsmannen", i.e. state representative in issues of discrimination

Muslim political parties with big electoral support in Norway and Denmark has not (yet) changed this. In the future the accommodating Nordic approaches to veiling in the public arena may be changing, since there have recently been intense debates about prohibiting the veil for police officers (in Norway), about prohibiting the burka in the public arena (in Denmark) and a government decision to ban all political and religious symbols for legal judges (in Denmark) (Andreassen, Lund and Siim 2008).

The analysis has shown that the variations in the reasoning in the three cases have different implications for veiled women as well as for third parties. In Denmark the liberal argument, which referred to the employer's right to determine clothing regulations, won against employees' religious freedom in the *Føtex* case, and it follows that the employers have the power to decide whether to accommodate demands for veiling by employees. This does not mean that employers use this right. There are indications that in practice the debate may have contributed positively to raise awareness of the issue among employers and employees and to stimulate new clothing regulations which can accommodate veiling. In Sweden the argument for religious freedom won, but the relatively depoliticised debate may have negative implications in practice because of the normative dilemmas that it does not talk about. The Norwegian Ombud institution was found to be the only example of intersectional reasoning, which formulated a link between direct religious discrimination with indirect gender discrimination explicitly addressing the fact that it is women wearing the veil who are discriminated against.

## 5.6 Conclusion: Multiculturalism and gender equality - issues and strategies

In the theoretical portion of this chapter, I have argued that the 'turn to diversity' opens new opportunities to rethink theories, concepts and models and address multiple inequalities and diversities, specifically in relation to gender, ethnicity and religion. Multicultural claims for accommodation of cultural and religious diversity and feminist claims to overcome gender inequality are often presented as competing equality principles, which need to be balanced. The growing feminist emphasis on intersectionality as a perspective on diversity is a response to this challenge to overcome unitary approaches. Arguably, political and social theory need to address multiple diversities and multiple inequalities and study how social categories, including gender, ethnicity and religion, intersect within and across nation states.

Yuval-Davis' approach to citizenship and politics of belonging is a promising model, which addresses intersecting inequalities at both the individual, structural and organisational levels and overcomes the nation state bias of previous citizenship models. Intersectionality has been used as a sophisticated analytical tool to understand how significant categories, notably gender and religion, are articulated in political and legal debates and also affect underlying notions of nationality. This



approach concerns structural, institutional and discursive power relations and resources between the dominant majority and minority groups, and it may therefore be used and abused in political debates in ways that stigmatise and marginalise minority groups.

Immigration represents new challenges for the Nordic welfare states and one of the central issues is connected to integration and accommodation of new forms of cultural and religious diversity in society. Immigration raises new research questions about the commonality and differences in the Nordic welfare, immigration and gender regimes. In spite of different approaches to migration, the integration and marginalisation of immigrant groups is perceived as a political problem in all the Nordic countries. Inequalities between native born and foreign born groups are growing and immigrant groups are not included on par with native citizens in the labour market, in politics and in society in general. The Scandinavian countries still fare comparatively well in relation to redistribution and gender equality, but immigration has increased social and political inequalities between native citizens and foreign born nationals, including inequalities among women.

Feminist scholarship has analysed the tensions between the Nordic welfare and gender equality regime and immigration, and have identified similar problems connected to marginalisation and discrimination of immigrant women and to a lack of respect for cultural diversity. The studies indicate that there are limits to the Nordic approach to welfare and illustrate that the women-friendly social policies do not always include ethnic minority women. They have thus raised critical questions about the abilities of the Scandinavian welfare and gender regime to integrate immigrant groups and live up to their own promises of social and gender equality. Welfare, immigration and gender research need to study the tensions in social, integration and gender equality policies from the perspective of immigrant women.

In spite of the differences in multicultural policies, each of the Nordic countries we have examined has problems with the integration of immigrant women into the labour market and into society more broadly conceived. None of these Scandinavian welfare states can therefore claim to live up to Helga Hernes' vision of a society 'where injustice on the basis of gender would be eliminated without an increase in other forms of inequalities, such as among groups of women'. The increased diversity and inequalities among women in Scandinavia represent a challenge to feminist research to be more self-reflexive in terms of who speaks for whom and who has the right to define what women-friendly social policies are or should be. Arguably, Scandinavian welfare and gender research needs to rethink the foundations of the welfare state and gender equality from the perspective of migration and diversity.

The analysis of the Danish, Norwegian and Swedish headscarf debates and regulations was inspired by empirical findings from the VEIL-project. They demonstrate the balancing of different arguments for and against women's demand for veiling in the private and public arena and indicate that the different reasoning may have unintended meanings and effects. The comparison between Denmark and

Norway illustrates the different framings and regulations of Muslim headscarves in relation to the labour market. In this arena, the public rulings balanced arguments for religious freedom against employers' authority to decide the dress-code of employees. In the Danish case the employer's power to determine the dress-code won the case against the argument for religious freedom. In the Norwegian case the Equality Ombud argued that a ban on an employee's demand for veiling would violate two intersecting principles: direct religious discrimination and indirect gender discrimination.

The analysis of headscarf debates and regulations in the three Scandinavian countries thus illustrates the importance of the power to decide on the specific domain as well as the power to balance between conflicting principles, reasoning and interests of social and political actors. The Danish case represents a high degree of politicisation around the headscarf issue and even when the employers won the legal argument the court cases may have contributed to raising awareness about the issue for Muslim women and employers. The Swedish case indicates that there may be unintended negative implications of a de-politicisation of the Muslim headscarf, if it is articulated solely as a religious issue and not as an intersectional issue. The Norwegian case suggests that there are positive implications of an intersectional approach to Muslim headscarves that is able to recognise the interrelations between gender and religious diversity. This articulation is premised on a multidimensional approach to equality, which interprets relations between gender, ethnicity/race, religion and nationality as multiple intersecting forms of discrimination, not as contradictory or competing equality claims, and is a promising democratic strategy.

This chapter has suggested that it is a democratic challenge to negotiate the principles of equality with recognition of diversity and to develop strategies able to include religious and cultural minorities in Nordic societies on an equal par with the national majorities. Future research should compare potential barriers that need to be addressed by political institutions, discourses and gender equality policies in order to empower immigrant and minority women as equal citizens in the Nordic countries. Power relations are transformative and dynamic and migration research should discuss strategies and best practices for accommodating cultural and religious diversity, including the diversity of family values and gender equality norms.

## References

- Andreassen, R. with B. Siim 2007. *Country-report, Denmark*. The report is written as part of the VEIL-project, "Values, Equality and Diversity in Liberal Democracies. Debates about Muslim Women's Headscarves", financed by the EC under the VI. Framework Programme 2006-2009.
- Andreassen, Rikke, Pedersen, Linda Lund and Birte Siim (2008). *Cross National Comparisons Denmark*, unpublished paper, September 2008.
- Banting, K. and W. Kymlicka. 2006. "Introduction." Pp. 1-45 in *Multiculturalism and the Welfare State*, edited by K. Banting and W. Kymlicka. Oxford, UK: Oxford University Press.

- Banting, K., R. Johnston, W. Kymlicka and S. Soroka. 2006. "Do multicultural policies erode the welfare state?" Pp. 49-91 in *Multiculturalism and the Welfare State*, edited by K. Banting and W. Kymlicka. Oxford, UK: Oxford University Press.
- Beck, U. 2002. "The Cosmopolitan Society and its Enemies." *Theory, Culture & Society*. 19(1-2): 17-44.
- Bellamy, R., D. Castiglione and E. Santoro (eds.). 2004. *Lineages of European Citizenship: Rights, Belonging and Participation in Eleven Nation-States*. Basingstoke, UK: Palgrave.
- Borchorst, A. and B. Siim. 2008. "The Women-Friendly Policies and State Feminism." *Feminist Theory*. 9(2): 207-224.
- Borevi, K. 2010. "Sverige: Mångkulturalismens fagskepp i Norden." Pp. 41-130 in *Velferdens grenser* (The Limits of Welfare), edited by G. Brochmann and A. Hagelund. Oslo, Denmark: Universitetsforlaget.
- Bredal, A. 2005. "Tackling Forced Marriages in Norway and Denmark: Between Women's Rights and Immigration Control." Pp. 332-353 in *"Honour": Crimes, Paradigms and Violence against Women*, edited by L. Welchman and S. Hossain. London, UK: Zed Books.
- Brochmann, G. and A. Hagelund. 2005. *Innvandringens Velferdspolitiske Konsekvenser*. Copenhagen, Denmark: Nordisk kunnskapsstatus, Nordic Council of Ministers.
- \_\_\_\_\_. 2010. *Velferdens grenser* (The Limits of Welfare). Del 1: Velfærdsstat, Nasjon og Innvandring, & Del 5: En model med tre unntak? Oslo, Norway: Universitetsforlaget.
- Christensen, A-D. and B. Siim. 2009. "Citizenship and Politics of Belonging – inclusionary and exclusionary framings of gender and ethnicity." Pp. in *Kvinder, Køn & Forskning*. Special issue vol 2/3, 2010.
- De los Reyes, P., I. Molina and D. Mulinari. 2003. *Maktens olika förklädnadar. Køn, klasse og etnicitet i det post-koloniale Sverige*. Stockholm: Atlas.
- Emerek, R. and M. Bak Jørgensen. 2009. Network on Socio-Economic Experts in the Non-Discrimination Field. Country Report 1 Denmark, unpublished Report, April 2009.
- Faist, T. 2007. "Introduction: The Shifting Boundaries of the Political" in T. Faist and P. Kivisto eds. *Dual Citizenship in Global Perspective: From Unitary to Multiple Citizenship*, Palgrave/Macmillan.
- Gullestad, M. 2006. *Plausible Prejudice: Everyday Practices and Social Images of Nation, Culture and Race*. Oslo: Universitetsforlaget
- Hagelund, A. 2009. "The future of the welfare state: paths of social policy innovation between constraints and opportunities", *unpublished paper*, Urbino, 17-19. September, 2009.
- Hedetoft, U., B. Petersson and L. Sturfelt. 2006. *Invandrare och integration i Danmark och Sverige*, Göteborg- Stockholm: Makadam.
- Hadj-Abdou L., S. Rosenberger, S. Saharso and B. Siim. 2009. "The limits of populism. Accommodative headscarf policies in Austria, Denmark, and the Netherlands", in S. Rosenberger and B. Sauer (eds.). *Politics, Religion and Gender: Regulating the Muslim Headscarf*, Routledge.
- Jønsson, H. vad and K. Petersen. 2010. "Danmark: den nationale velfærdsstat møder verden," in Brochmann, Grete & Anniken Hagelund, *Velferdens grenser* (The Limits of Welfare). Oslo: Universitetsforlaget, pp. 131-210.
- Kilic, S., S. Saharso and B. Sauer. 2008. Introduction: The VEIL: Debating Citizenship, Gender and Religious Diversity, *Social Politics. International Studies in Gender, State and Society*. Special Issue: The Veil: Debating Citizenship, Gender and Religious Diversity, No. 4, 2008
- Koopmans R. and P. Statham. 2000. *Challenging Immigration and Ethnic relations Politics: Comparative European Perspectives*, Oxford: Oxford University Press.
- Kraus, P. 2009. "Complex Diversity", Paper presented at the EUROSHERE's summer school, Tallin, Estonia.
- Kymlicka, W. 1995. *Multicultural Citizenship*. New York: Oxford University Press.

- Kymlicka, W. and W. Norman (eds.). 2000. *Citizenship in Diverse Societies*. New York: Oxford University Press.
- Lanefelt, L. 2010. "Regulating the veil in Swedish-style: Tolerance and the Absence of Intersectionality in Public Reasoning on the Issue of Veil", *unpublished paper* presented at the DEMDI conference, Oslo, 28-29 January.
- Langvasbråten, T. 2008. "A Scandinavian Model? — Gender Equality Policy and Multiculturalism in Sweden, Denmark and Norway 2000-2005" in *Social Politics. International Studies of Gender, State and Society*.
- Lombardo, E., P. Meier and M. Verloo (eds.). 2009. *The Discursive Politics of Gender Equality*, London: Routledge.
- Melby, K., A-B. Ravn and C. Carlsson-Wetterberg, (eds.). 2008. *Gender Equality as a Perspective on Welfare: The Limits of Political Ambition*. Policy Press.
- Modood, T. 2007. *Multiculturalism*. Cambridge: Polity Press.
- Modood T., A. Triandafyllidou, and R. Zapata-Barrero (eds.). 2006. *Multiculturalism, Muslims and Citizenship: A European Approach*, London: Routledge.
- Mulinari, D., S. Keskinen, S. Irni and S. Tuori. 2009. "Introduction" in *Post-colonialism and the Nordic Models of Welfare and Gender*.
- Okin, S. M. with respondents, J. Cohen, M. Howard and M. Nussbaum. 1999. *Is Multiculturalism Bad for Women?* Princeton: Princeton University Press.
- Phillips, A. 2008. *Multiculturalism without Culture*, Princeton: Princeton University Press.
- Priested Nielsen, H. 2009. "Islam: a dead end for female Immigrants in Denmark", in G. Tibe Bonifacio (ed.) *Gender, Religion, and Migration: Pathways of Integration*, Amazon.
- Priested Nielsen, H. and C. Thun. 2010. 'Multicultural feminism in Denmark and Norway?', in Kvinder, Køn og Forskning, vol 2/3.
- Siim, B. 2007. "The Challenge of Recognizing Diversity from the Perspective of Gender Equality – Dilemmas in Danish citizenship." *Critical Review of International Social and Political Philosophy* 10, no. 4: 491-512.
- . 2009. "Gender and Diversity in the European Public Sphere", *EUROSPHERE Working Paper Series*, No. 17, March 2009.
- Siim, B. and H. Skjeie. 2008. "Tracks, intersections and dead ends. Multicultural challenges to state feminism in Denmark and Norway," *Ethnicities* vol. 8:3.
- Siim, B. and J. Squires. 2008. *Contesting Citizenship*. London: Routledge.
- Siim, B. and A. Borchorst. 2010. "The multicultural challenge to the Danish Welfare state — Social Politics, Equality and Regulating Families", in J. Fink and Å. Lundqvist (eds). *Changing Relations of Welfare. Families, Gender and Migration in Britain and Scandinavia*.
- Squires, J. 2007. *The New Politics of Gender Equality*, Palgrave/Macmillan. SOU 2006: 37
- Om velfärdens gränser och det villkorade medborgerskapet*, Pauline de los Reyes (ed). Stockholm: Statens offentliga utredningar.
- Togeby L., et al. 2003. *Magt og Demokrati i Danmark – hovedresultater fra magtudredningen*, Århus: Århus Universitet.
- Udlændinge- og integrationspolitikken i Danmark og udvalgte lande* (2004).- Baggrundsrapport, Tænketanken om udfordringer for integrationsindsatsen i Danmark i samarbejde med Socialforskningsinstituttet, Ministeriet for Flygtninge, Indvandrere og Integration.
- Yuval-Davis, N. 1997. *Gender and Nation*. London: Sage.
- . 2006a. "Belonging and the politics of belonging", *Pattern of Prejudice*, vol. 40, no. 3, pp. 197-214.
- . 2006b. "Intersectionality and Feminist Politics", *European Journal of Women's Studies*, vol. 13, pp. 193-209.
- . 1997. *Gender and Nation*. London: Sage Publications.