

Social assistance schemes in the Scandinavian countries: Changing target groups – similar or different reactions?

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Abstract

Several institutional features unify Denmark, Sweden and Norway, and the existence of a distinct 'Nordic welfare model' is widely acknowledged, but during recent years the three countries have adopted different policies towards settled immigrants. In particular it appears striking, how different issues of immigration and integration policy have been political debated in the three countries.

A central question is, whether these differences are also reflected in the way more traditional welfare state policy areas 'cope' with the increased number of citizens with an immigrant background.

Social assistance schemes are for several reasons an interesting case to explore in this respect. First of all, in all three countries the number of social assistance receivers with an immigrant background is extensive and they are strongly overrepresented among recipients of social assistance. The questions raised in this paper are to which extent we see similarities and differences across the three countries in the way the immigrant dimension has been incorporated into the social assistance schemes within each country and whether social assistance measures targeted at immigrants differ from the institutional preconditions within each country.

This paper analyses how the social assistance schemes in the three countries have reacted in many ways differently to the increasing number of receivers with an immigrant background but we also see some common tendencies. In particular Denmark stands out when it comes to the generosity of social assistance. Hence, since 2002 Denmark has repeatedly reduced the social assistance level where the target group for these reductions either directly or indirectly have been people with an immigrant background. The most recent and controversial reform is the so-called 300-hour rule from 2006 (now a 450-hour rule), which states that recipients of welfare benefits who are married loose the right to welfare payments if they work less than 300 hours during a two year period. The rule applies to everybody regardless of citizenship or ethnicity, but in practice it is primarily targeted at immigrants and the majority of those affected are immigrant women.

Taking the (in many ways) common normative foundation behind the three countries into account, this difference is remarkable and emphasizes the importance of taking the so-called 'immigrant-dimension' into account when analysing recent changes in the institutional configuration of social assistance schemes.

This paper starts out by analyzing recent changes in the Danish social assistance scheme by focusing on the 'immigrant-dimension' and changes in the benefit level and compares the findings to recent changes in Sweden and Norway.

1. Introduction

1a. Discrepancy between political rhetoric and the practical policy level

In the existing research literature it is widely acknowledged that immigration– and integration policies in the Scandinavian countries differ in several ways. Especially Denmark and Sweden are known for two very different things: Denmark is known for a very harsh tone and many tightening rules, while Sweden often is idealized as a country founded on diversity, pluralism and equality (e.g. Hedetoft, 2006; Jørgensen, 2006; Alsmark, 2007).

On the other hand, when it comes to welfare policies, and the institutional and political structure of the three Scandinavian welfare states in general, the existence of a distinct ‘Nordic welfare model’ is widely acknowledged (Greve, 2007). Hence, a common notion in the comparative welfare state literature is that if we compare Denmark, Norway and Sweden, several institutional features unify them. Some of the common institutional features are relatively high social protection and generous benefits, high minimum wages and a compromised wage-structure, universalistic welfare state arrangements, largely tax financed, a high degree of public involvement, strong involvement of labour unions and low wage differentials, women friendly policies etc. (Greve, 2007).

In previous research about how the Scandinavian countries ‘deal’ with immigration and increasing ethnic diversity, the focus has in particular been on the rhetorical level, including how the political elite in the three countries ‘talk’ about immigration and integration issues (e.g. Borevi, 2002; Jørgensen, 2006; Holm, 2005; Hagelund, 2002). From this literature it appears striking, how different issues of immigration and integration policy have been political debated during the years in Sweden and Denmark. Somewhere in between we find Norway.

Previous research within this field gives a much needed picture of what is going on in the Scandinavian countries at the rhetorical level among the political elite but the question is whether these countries also differ at the practical policy level and in the substance of the policies introduced. In other words, how different are the concrete measures and policy instruments the countries use in order to integrate ethnic minorities in the society?

In is a common notion within research literature that ‘*Political parties quite often disagree on means while they degree on ends*’ (Vedung, 2003: 41) and from the organizational theory we have learned that there can be inconsistency between ‘*what is said and what is done*’ within an organization (Meyer & Rowan, 1977). There are good reasons also to believe that this is the case within the political system. This is exactly what Carl Dahlström (2004) concludes on the basis of a study of immigrant policy in Sweden in the period 1964-2000. Hence, Carl Dahlström (2004) finds that the principles behind the policy programs in Swedish immigrant policy (the practical policy level) have by and large not changed over a period of around 30 years from this policy area was founded in the 1960s and 1970s until 2000. In the same period the policy objectives in Swedish immigration policy (the rhetorical level) have changed several times within the same period in order to accommodate moral criticisms in the public debate. In general Dahlström (2004) finds that these two levels are only loosely joined. One possible explanation for this discrepancy is that policy objectives and policy programmes are evaluated in two different spheres - policy objectives

are evaluated in the public political debates where the focus is on questions of moral values, whereas policy programs are evaluated through administrative reviews within government where issues of efficiency are at stake (Dahlström, 2004).

These findings raise the question whether the differences between the Scandinavian countries, when it comes to immigrant and integration issues, primarily appears at the rhetorical level and in the way policy objectives are politically debated.

Also the Danish immigrant researcher Ulf Hedetoft (2006: 309-407) raises the question – based on a comparison of immigration- and integration policies in Denmark and Sweden – whether we see two opposing trends at the same time: ‘Practical convergence’ on the one hand and ‘discursive divergence’ on the other. The point here is, that the practical policy at some policy areas is more or less the same across the two countries, while immigration and integration issues are political debated very differently.

In a recent comparison of the relation between immigration and the welfare state in Denmark, Norway and Sweden (Brochmann & Hagelund, 2010) the question about similarities and differences between the Scandinavian countries is also raised. Brochmann & Hagelund (2010) conclude that the three Scandinavian countries – in particular Denmark and Sweden – justify their immigrant policy in very different ways but that: *‘It is not certain that the ideals in the integration policy-discourse are also reflected in the practical policies’* (Brochmann & Hagelund, 2010: 354 (my own translation)). In spite of this it is explicitly underscored that although the three countries at the practical policy level in many ways are similar, we also have to do with some remarkable differences.

To sum up: When it comes to the Scandinavian countries we see substantial differences at the political rhetorical level. But at the same time, when we look at the practical level - as for example the content of the policy and the concrete policy instruments introduced in order to fulfill the political objectives - it is not so obvious how similar and different the countries are. When comparing the Scandinavian countries, and how they deal with immigration, it is therefore necessary to differentiate between the level of political rhetoric on the one hand, and the practical policy level on the other, where the last-mentioned refers to the concrete content of a policy and policy instruments (and therefore not the phase of implementation or the impact on lived lives, which ‘practical policy’ sometimes refers to).

This aim with this paper is not to analyze the discrepancy between rhetoric and the substance of policies. Instead it compares Denmark, Norway and Sweden when it comes to the concrete policy measures introduced during recent years: Which kinds of measures and policy instruments have actually been introduced as a result of increasing ethnic diversity in the population?

When analyzing the practical policy level, and how the immigrant dimension¹ has been incorporated into existing policy areas, it is not only important to be aware of the discrepancy between political rhetoric and the practical policy level but also the *‘nature of immigrant policy’*.

¹ During the paper I refer to a so-called immigrant dimension, which refers to how existing policies how been changed as a result of increased ethnic diversity in the population.

First of all, *immigrant policy* is something different than *immigration policy*. Hence, immigrant policy refers to the conditions provided to resident immigrants, while immigration policy refers to the regulation of flows of immigration and control of aliens (Hammer, 1985). This paper only deals with immigrant policy.

In existing research literature, immigrant policy is sometimes considered as a defined policy area, which has risen during recent years as a consequence of increased diversity in the population. This is not the way immigrant policy is considered in this paper. Instead the starting point is that the institutional framework in the welfare state provides important conditions for the way the immigrant policy is structured (Brochmann & Hagelund, 2010).

Hence, many of the most central policies, which have been introduced in order to help new citizens to be included in the society, are to be found in this tension between immigrant policy on the one hand and welfare state policies on the other. Therefore, when we study the practical policy level when it comes to immigrant policies, we also have to take the institutional preconditions into account and analyze how they interact with the immigrant dimension. By doing this we hopefully get a more nuanced and in depth picture of how the Scandinavian welfare states incorporate the immigrant dimension into existing policies.

1b: Research focus

Social assistance schemes can be regarded as a concrete example on a welfare policy area where the number of receivers with an immigrant background has increased considerably since the 1980s and where policies specifically targeted at immigrants have been introduced. The paper analyzes how this specific policy area in Denmark, Norway and Sweden has 'coped' with the increased number of immigrants:

To which extent do we see similarities and differences across the three countries in the way the immigrant dimension has been incorporated in the social assistance schemes, and do social assistance measures targeted at immigrants differ from the institutional preconditions within each country. The period considered are the years going from the 1980s until 2010.

Social assistance schemes are an interesting case to explore for several reasons:

Firstly, immigrants (as well as young people in the age 18-24 years) are strongly over-represented among recipients of social assistance in all three countries, among other things because many immigrants are not qualified for unemployment insurance benefits - often due to lack of enough work experiences (Johansson & Hvinden, 2007: 56), and because they do often not have other support options. Hence, '*In all Nordic countries, social assistance will be granted when all other support options in connection with loss of income or other social events have been exhausted. Consequently, the assistance, which is means-tested in all the countries, is the last resort of assistance granted by the social security systems*' (NOSOSCO, 2008: 179). And for many social assistance recipients with an immigrant background the road to employment is riddled with bumps.

The strong over-representation of immigrants in the social assistance schemes became an important topic in the three countries in the 1980s and 1990s (Brochmann & Hagelund, 2010). The awareness of the 'problem' initiated political attention from almost all political parties and during the years new measures, which act as a supplement or an alternative to the social assistance schemes, have been introduced. The most central and well-known of these new measures is the so-called Introduction allowance targeted at newly arrived immigrants – introduced in Denmark in 1999, in Norway in 2004 and in Sweden in 1993 (Djuve & Kavli, 2007). This benefit replaced the ordinary social assistance benefit in the introduction period. In Denmark the Introduction allowance is not only paid to people admitted to the country for the first three years (if they participate in an introduction programme) but also afterwards for the next four years (the 'start assistance').

Before the Introduction allowance was launched in the three countries many newly arrived immigrants became social assistance recipients from day one, and these new measures therefore replaced existing for some specific groups in the social assistance system.

In Denmark, also measures targeted at long-term recipients of social assistance with an immigrant background have been introduced during recent years (reduced social assistance in a number of situations and the so-called 300 hour rule (now 450 hour rule)). These initiatives are general social policy elements but in reality the majority of those affected are immigrants and when they were launched the government did not hide the fact that immigrants were the main target group and special prioritized (e.g. The Danish Government, 2005).

Social assistance schemes are also an interesting case to explore because this policy field represents an interesting case on how differently the three countries have coped with the immigrant dimension. When we look at labour market oriented policies targeted at immigrants as a whole we have to do with similarities as well as differences across the three countries and the measures which differ most are the one concerning economic maintenance for uninsured unemployed migrants.

The *first* difference between Denmark, Norway and Sweden concerns the generosity of social assistance for immigrants. Thus, since 2002 Denmark has repeatedly reduced the benefit level provided for immigrants – which has not been the case in Norway in Sweden. At first for newly arrived immigrants as a part of the introduction of the start assistance and introduction allowance, and later by reducing social assistance in a number of situations, and in the form of requirements to couples receiving social assistance to work 300 (now 450) hours. In a welfare state perspective this difference is remarkable considering that Denmark, opposed to Sweden and Norway, has moved away from some of the basic principles in the Scandinavian welfare state such as income security and generous benefits (e.g. Ejernæs, 2001).

The *second* difference concerns the relation between rights and obligations when it comes to the Introduction allowance, where Sweden stands out by being the only country, where it is voluntary for the newly arrived immigrants to participate in an Introduction programme and then receive Introduction allowance. In addition to this, the municipalities decide themselves whether to offer newly arrived immigrants a special Introduction allowance or ordinary social assistance. In case of illegal absent from an Introduction programme the municipalities in Sweden also decides

themselves whether the income level should be reduced or not (Djuve & Kavli, 2007). But this will maybe come to an end in December 2010, where a reform of the Introduction allowance (and the efforts for newly arrived immigrants in general) presumably is initiated.

In Denmark as well as in Norway (and probably also soon in Sweden) policies targeted at immigrants stand out from the institutional preconditions and the policies targeted at social assistance receivers in general within each country. In Denmark it is in particular when it comes to the benefit level that policies targeted at immigrants stands out. In Norway (and probably also soon in Sweden) the Introduction allowance stands out from the administrative framework when it comes to the degree of local discretion in the municipalities in deciding rates for payment.

What is interesting is therefore not only that new initiatives have been introduced and that they differ across borders, but also the way they interact with existing institutional preconditions. How do they handle people who do not have other sources of income and therefore are in need of a last resort income – but who have an immigrant background? Does their ethnic origin have a negative impact on their social rights?

In the course of the 1990s many European countries have increased their use of active labour market policies (ALMP), which oblige the unemployed to participate in activation programmes in return for unemployment benefits or social assistance. Also in the Scandinavian countries ‘work-for-pay’ measures have been introduced and the social assistance schemes been more closely related to active participation. This paper only focuses on measures introduced concerning economic income maintenance and therefore not the type of activation programmes that social assistance recipients meet in the municipalities, the content of the Introduction programmes, settlement policies etc. However, in practice it can occasionally be difficult to separate the question about economic income maintenance from other labour market oriented policies targeted at immigrants.

Two categories of immigrants are in focus in this paper: Newly arrived immigrants as well as long-term receivers of social assistance with an immigrant background. I consider these two groups as being the most vulnerable immigrant groups with the most marginal position on the labour market in the Scandinavian countries. By immigrants the paper refers to settled unemployed immigrants born outside with a legal residence status in Denmark and therefore not labour migrants, asylum seekers, illegal immigrants etc.

The theoretical point of departure in the analysis of how the Scandinavian countries have incorporated the immigrant dimension into existing welfare policies is a historical institutional² approach. I will not go into depth with this approach but only emphasize the basic points that ‘*the temporal ordering of events or processes has a significant impact on outcomes*’ (Pierson, 2004) and that a path taking at one point will affect the future trajectory. This basically means, that existing institutions – in this case welfare state institutions – does not change easily.

Hence, in many ways the basic institutional pattern in the welfare state was already established when the number of immigrants in the populations in the three countries started to rise which is

² With institutions in this case by and large, we have to do with ‘formal or informal procedures, routines, norms and conventions embedded in the organizational structure of the polity or political economy’ (Hall & Taylor, 1996).

why the formative moment - the time when the underlying pattern and the basic structure in an institution is settled - is very crucial for future trajectories. Therefore the decision about the arrangement of the social security system provides important conditions for the immigrant policy introduced afterwards. This is why the starting point in this paper is how existing policy area has 'incorporated' immigrants and not the other way around.

By taken this starting point it does not entails that the institutional framework in the Scandinavian welfare is resistant to change when the population gets more diverse and is faced by the immigrant dimension and that only 'institutions matters'. In contrast to this, the findings in this paper illustrate how we sometimes see that institutional frameworks following the same 'path' when new measures are introduced while we in other cases see the introduction of totally new principles and practices. But anyway the basic argument is, that institutions settled in the past are important to take into consideration in order to understand why countries 'cope' with immigrants the way they do.

As appears, Denmark is for several reasons the country where we have seen the most far-reaching changes and which stands most out from as well the other countries as well as the institutional preconditions within the country. Not only has a specific benefit for newly arrived been introduced – but we have also seen de facto changes targeted at immigrants in the general social assistance system. The paper therefore starts out by analyzing recent changes in the Danish social assistance scheme and compares the findings to Sweden and Norway. But first the next section elaborates further on the nature of social assistance schemes in the three countries

2. Social assistance schemes in the Scandinavian countries

As mentioned, immigrants have since the 1980s been strongly over-represented in the social assistance schemes in Denmark, Norway and Sweden.

It is difficult to find comparable statistical information about the share of immigrants receiving social assistance, but information from within each of the three countries clearly shows more or less the same pattern - immigrants are clearly over-represented.

Statistics from Sweden in 2007 showed that social assistance recipiency among natives were 2 percent, while it was 12 percent among foreign born (National Board of Health and Welfare, 2009). According to Mood (2009: 9) in 2003 social assistance recipiency was under 4 percent. Compared to the situation in the 1990s long-term dependency on social assistance is more common in 2000s (at the same time a decrease in short-term recipiency has occurred). Therefore Mood (2009: 10) concludes, '*...that SA (social assistance, red) in Sweden is increasingly becoming an experience for a highly dependent group consisting predominantly of immigrants*'. In order to change this picture it is pointed out, that '*we need to concentrate primarily on the situation among immigrants*' (Mood, 2009: 10). By the mid-1990's immigrants in Sweden accounted for nearly half of the expenditures going to social assistance. Compared to this immigrants represent approximately an 11 percent minority of the population (Hansen & Lofstrom, 2009:1).

In a Norwegian government white paper from 1997 it was highlighted that the share of immigrants receiving social assistance, recipients with an immigrant background were three times

higher than among persons with a Norwegian background (St. Meld, 1996-97:17). In 2004 3 percent of the Norwegian populations as a whole were receivers of social assistance (exclusive children and spouses) while around 11 percent of first generation immigrants were receivers of social assistance or Introduction allowance. In particular immigrants from non-western countries are overrepresented (Dahl & Lien, 2006:9-10).

In Denmark around 30 percent of the social assistance receivers had an immigrant background from a non-western country in 2006 (Rosdahl & Petersen, 2006). Compared to this in 2008 around 4,3 percent of the population had a non-western background (first generation) (Statistics Denmark, 2008). Also in the 1990s immigrants were over-represented among social assistance reciprocity. Hence, in 1998 39 percent of long term social assistance receivers were immigrants and in 1992 the share of immigrants among long term receivers was 21 percent. While the number of social assistance receivers with a Danish background has decreased during the years we have seen an increase when it comes to immigrants – like the situation in Sweden mentioned above. (Filges, 2000).

Not only have specific measures targeted at immigrants been introduced during the years, but also in general social assistance schemes have been at stake in the political debate and in the discussion about the ‘survival’ of the welfare state: *‘Besides more general arguments concerning the assumed work disincentives generated by overly generous benefit levels, concerns are often raised that means-testing as such may create so-called poverty traps. In such situations, citizens refuse to enter employment due to fears of losing entitlements’* (Palme et al. 2009).

Furthermore, social assistance has been subject to cutbacks in several European countries during recent years (Palme et al. 2009) and immigrants and young unemployed people (which are over-represented among social assistance recipients) are generally regarded as the less deserving (Johansson & Hvinden, 2007; see also van Oorschot, 2006) .

During recent years social assistance schemes in the three countries have been closer related to active participation and ‘work for benefit’ measures. Hence, during the 1990s many European countries have increased their use of active labour market policies (ALMP), which basically means that unemployed people are obligated to participate in activation programmes in return for unemployment benefits or social assistance, redefining the relationship between rights and duties for unemployed people. This happened in the same period as the question about immigrants’ overrepresentation in welfare arrangements reached the political agenda in the Scandinavian countries (Brochmann & Hagelund, 2010).

The moral virtues of work and the Protestant ethic have for several years been central elements in the Nordic work ethic and in the promotion of the work-line (Johansson & Hvinden 2007: 57), and the focus on active participation among unemployed people is not new – especially not in Sweden and Norway. What is new is the extensive strong focus on active participation for social assistance recipients (Lorentzen, 2006).

Among several scholars it have been a common notion that the specific institutional and normative features of the Nordic countries are also reflected in their activation policies (Johansson & Hvinden 2007: 53; Ferrera & Hemerijck 2003), and that we have to do with a distinct universalistic model. It is up for discussion whether it is the case (for a discussion of whether this is

the case see Johansson & Hvinden, 2007), nevertheless it is important to bear in mind, that although they share some of the same characteristics activation policies differ in some important respects. In particular we see institutional differences in the social assistance systems in the three countries (see also Gough, 2001).

Social assistance in all the three countries are administrated by the municipalities, but the way they do this and the scope for local and professional discretion varies considerably: Hence, the degree of discretion is largest in Norway and Sweden, and lowest in Denmark (Johansson & Hvinden, 2007: 56).

The social assistance scheme in Denmark is the most centralised and the Danish government has created standardized rates for payment. In Denmark the government has also specified into detail when and how municipalities have to apply sanctions towards social assistance recipients in case of illegal absent (Johansson & Hvinden, 2007: 61, 63).

Since 1998 Sweden has worked with minimum economic standards for the social assistance level (norms), which serves as a guideline for the social worker who decides the actual size of the benefits. According to Hansen & Lofstrom (2009: 945) until 1998 the norms were determined in each of the 288 municipalities in Sweden, but in 1998 the regional variations were replaced by a national norm. The question about applying incentives and sanctions in Sweden – as well as in Norway – is compared to Denmark more open to local and professional discretion (Johansson & Hvinden, 2007: 63)

According to Johansson & Hvinden (2007: 61) *'Only the Norwegian social assistance has retained most of its traditional characteristics, as a system based on local self-determination and, at best, locally agreed-on rates for social assistance payments'*.

3. The Danish active line

As mentioned, what is in focus in this paper is not only how the three countries have incorporated the immigrant dimension but also how policies targeted at immigrants (directly or indirectly) relates to institutional preconditions within each country. What is in particular interesting when it comes to the Danish case is how policies targeted at immigrants differ from recent labour market reforms. This relation is outlined below.

3a: Continuity and change

In Denmark, there is considerable disagreement about the interpretation of recent labour market reforms. In particular, recent changes occurring since the Liberal-conservative government, with help from their right wing supporting party the *Danish Peoples Party*, won the election in 2001, have been interpreted in different ways.

Among scholars it is common to distinguish broadly between two national models of activation: Hence, Barbier (2004) distinguishes between a liberal (work first) and a universal model of activation (social investment), where Denmark is highlighted as representing the most pure form of the 'social investment' approach and United Kingdom is pointed out as being close to the liberal

one. Lødemel and Trickey (2001) presents in many ways a similar typology, which distinguish between a national model of activation emphasizing human resource developing and another emphasizing labour market attachment. Denmark is pointed out as a prototype on human resource development because this model stands out: '*from the rest in its emphasis on a long-term strategy and on human capital development*' (Trickey 2001: 278).

This fairly harmonic picture is in general based upon characteristics of Danish activation policies in the 1990s and we therefore have to take into account the many remarkable changes which have undergone Danish labour market policy during recent years (e.g. Jørgensen 2008).

In order to get a more fully and updated impression of the Danish active line we therefore have to distinguish between two time periods: 1) The period from 1993 (when the active labour market policy was introduced in full scale by the new Social Democratic coalition government) to 2001 (when the Liberal-conservative government, with help from their right wing supporting party the *Danish Peoples Party*, won the election and came into office) and 2) The period between 2001 and 2006 when the active labour market reforms introduced in 1990s were further developed, adjusted and changed.

Hence, up until 2001, when the Liberal-Conservative government came into power, Danish ALMP had been adjusted and changed, but it did not represent a break with the strong emphasis on human investment instead of economic incentives and work-first (Larsen & Andersen, 2004; Jørgensen, 2008). What has been central in this first period, compared to several other European countries, is *its emphasis on a long-term strategy and on human capital development* and when it comes to social security provision for unemployed in this period; we did not see any cuts in the benefit level. But considerable reductions in the duration period for receivers of unemployment benefits and stricter conditionality rules were introduced.

The interpretations of the second period are more equivocal. Hence, after 2001 some parts of the Danish labour market policy from the 1990s continued while other aspects were changing (e.g. Andersen & Pedersen, 2007b; Jørgensen, 2008). As regards social assistance recipients however, we have seen several restrictions on benefits since 2001 for some voluntary groups (in particular immigrants from non-western countries) and a remarkable scale down of activities emphasising education and up-qualification (e.g. Jørgensen 2008). These changes imply a movement away from human investment towards work-first. However, the Danish version still differs from the liberal one, pointed out by Barbier (2004) as United Kingdom, in several ways, e.g. we have not seen remarkable cutbacks in social benefits to make work pay for unemployed persons in general.

What is notable, when it comes to the labour market reforms since 2001, is that social assistance beneficiaries with an immigrant background have been the prioritized target group. Also before 2001, several of the activation measures were directly or indirectly targeting social assistance beneficiaries with an immigrant background. However, as compared to general employment policies, economic sanctions and incentives particularly targeting immigrant unemployed meanwhile have become substantially more important. In particular three reforms stand out and illustrate this tendency:

1) In 2002, the first remarkable incentives targeted immigrants were introduced. The law on immigration from 2002 included, besides restricted rules for immigrants, the so-called '*start*

assistance or 'introduction allowance' (paid amount is the same) which replaced social assistance. The main argument was to strengthening the financial incentives to find employment. This assistance is some 35-50 percent lower than ordinary social assistance, depending on family situation (reductions being lowest for people with children) (Andersen 2007a; Hansen and Hansen 2004).

2) *'More people to work'* from 2002 reduced social assistance in a number of situations in order to ensure that people have an incentive to take a minimum-wage job. The initiative is a general social policy element but in reality the majority of those affected were immigrants (Andersen, 2007a). As to the labour market initiatives of 2002, families where both spouses received social assistance had their benefits reduced by 135 € per month after six months. A maximum for supplementary support (mainly for families with children) was introduced at the same time (reductions up to € 350 per month in some cases). If a wife was considered a homemaker, social assistance was replaced with a homemaker supplement (which was abolished entirely in 2006).

3) The third reform targeted at immigrants is *'A New Chance for All'* from 2006. The reform included several aspects; the most controversial was the so called '300-hour rule' (later a 450-hour rule). The reform stated that recipients of welfare benefits who are married loose the right to welfare payments if they work less than 300 hours during a two year period. The rule can therefore be seen as a kind of 'available test' for the labour market.

Some only see these benefit reductions as minor, among other things because it only affects a small group outside the labour market, and because we have not seen a decrease in the generous protection for the main part of the unemployed (Pedersen & Andersen, 2007b), while other see these changes as far-reaching (e.g. Ejernæs & Skytte, 2004).

To illustrate the increased emphasis on financial incentives and a downgrading of ideals regarding ensuring financial security for all citizens, two of the most central labour market reforms targeted immigrants are outlined: 1) *Law on immigration* from 2002, where the introduction allowance/start assistance was launched and 2) *'A New Chance for All'* from 2006 where the 300-hour rule was introduced.

3b. 2002: Law on immigration and the start-assistance

In 1999 the first national Integration law was implemented under the leadership of a Social-democratic lead government. In December 1994 a so-called Integration commission was set up with the remit to review existing integration policies and submit proposals in order to formulate a comprehensive integration policy. The commission delivered their report in 1997 (Ministry of the Interior, 1997). One of the things the commission did not mention (and therefore neither proposed) was benefit reductions for newly arrived immigrants (Jønsson & Petersen, 2010: 190). But when the bill was introduced, the government introduced an introduction allowance, which was considerably lower than the ordinary social assistance level. Hence, calculations showed that it corresponded to a 50 % decrease compared to the ordinary social assistance level (Ejernæs, 2001).

As mentioned, benefit reductions for newly arrived immigrants were not proposed by the Integration commission but it was up for discussion in other central documents in the 1990s. Hence, in 1997 unemployment among immigrants as a 'structural welfare state problem' was highlighted in a report 'Outline of the Danish Economy' from the Ministry of economic affairs (Ministry of Economic affairs, 1997; Necef, 2001). A selective adjustment of sudden public benefits in order to strengthen the financial incentives to find employment among immigrants was recommended and the welfare state was not highlighted as being a part of the 'solution' but instead as a part of the 'problem'.

The introduction of this introduction allowance gave rise to a lot of criticism, among other sides from the UNHCR (*Office of the United Nations High Commissioner for Refugees*), which saw it as discriminating. Later in 1999 the government therefore decided to withdraw the introduction allowance again. The formal argument was that increased financial incentives did not improve employment among newly arrived immigrants, and that the public cost saving therefore was limited. Hence, an evaluation of the employment effect of the rule showed that the positive effects were minor. This was the formal argument, but several circumstances indicated that the withdrawing more was related to the extensive critique (Ejernæs, 2001).

As mentioned, in November 2001 a Liberal-conservative government, with help from their right wing supporting party the *Danish Peoples Party*, won the election in 2001 and came into office. The Danish Peoples Party had at the time, and still has today, immigration as a key concern, and in 2002 the law on immigration was introduced once more, which included, besides restricted rules for immigrants, the so-called '*start assistance*' or '*introduction allowance*' (paid amount is the same) which replaced social assistance for newly arrived immigrants. This time it was not withdrawn and was not subject to criticism from the UNHCR because it was also targeted at citizens with a Danish background who had been outside the country for 7 years or more and had come back.

This start assistance is some 35-50 percent lower than ordinary social assistance, depending on family situation (reductions being lowest for people with children) (Andersen 2007a; Hansen and Hansen 2004). Where Danish social assistance is comparatively generous, start assistance/introduction allowance is among the *least* generous schemes in North Western Europe (Hansen, 2006). Introduction allowance is paid to people admitted to the country for the first three years if they participate in an introduction programme. Afterwards people will receive "start assistance" for the next four years. The benefit level is therefore the same during all seven years.

For immigrants coming to Denmark after July 1st 2006, the transition from start assistance to social assistance after 7 years requires that the recipients have had an ordinary full-time employment for 2½ years within the last 8 years.

The formal political arguments for introducing this lower benefit were to strengthen the financial incentive to find employment.

Since 2002, when the start assistance was launched, it has been much debated in the public debate as well as in research communities, whether a strengthening of the financial incentives for newly arrived immigrants actual increase their participation on the labour market or whether the consequences of the lower benefit level is poverty and/or a worsening of their life situation

(Hansen & Hansen, 2004; Blauenfeldt et al., 2006; Huynh et al., 2007; Minister of Employment in Denmark, 2005; Ghosh & Juul, 2008).

The administrative framework of the Introduction allowance (and the start assistance) is mostly the same as for social assistance. For example with both we have to do with standardized rates for payment, where the exact rate depends on factors such as material status, number of children, property etc.

3c: 2006: 'A New Chance for All' and the 300-hour-rule

The latest and most important reform targeted immigrants is 'A New Chance for All' from 2006. The reform included several aspects; the most controversial was the so called '300-hour-rule', which was formally introduced in 2006. The reform stated that recipients of social assistance who are married loose the right to welfare payments if they work less than 300 hours during a two year period³. Before a person loses her or his benefits, the legislation requires that the person in question half a year before receive a warning so the person has the possibility to find a job in the meantime.

The rule was implemented by April 2007. In a compromise (over the state budget) in 2008, the requirement was increased to 450-hours and came to include all married recipients of social assistance. The rule applies to 4 out of 5 'matching groups'⁴ – except those where 'no job functions are possible at all'. 450 hours of work only covers ordinary employment and not jobs with wage substitute, practical training, participation in activation programs etc.

The 300/450-hour rule applies to everybody regardless of citizenship or ethnicity. In practice, the 300-hour rule is primarily targeted at immigrants. An overview of the effect of the 300-hour rule in the municipality of Copenhagen found that 85 percent of those affected by the rule were immigrant women (Politiken, 11.12.2007; see also Bach & Larsen, 2008). Official documents from the Minister of Employment also outlined that immigrant women are the main target group (The Danish Government, 2005).

The rule is very controversial due to the fact that it contains strong work requirements and heavy economic sanctions and arguments about testing whether immigrant women actual are available for the labour market have been crucial. Moreover, moral and more paternalistic arguments have been highlighted. Hence, it is clear that the notion about 'housewife-mentality' and the ambition about increasing gender equality among immigrants were figuring as core arguments in the legitimizing of 300-hour-rule, when it was introduced in 2006/2007 (Breidahl, 2008). Every time the Danish Minister of Employment was confronted with the necessity of the rule, he stresses 'housewife-mentality' as the main factor for preventing immigrant women from working. Therefore, the crucial factors emphasized are traditional values, cultural elements, and patriarchal family views, which do

³ In the first year, from 1.4.2007 – 1.4.2008, the requirement is 150 hours ordinary work, within the last year.

⁴ Match group 1) Good match with the labour market, Match group 2) Good match, a few qualifications missing, Match group 3) Partial match, some relevant qualifications, Match group 4) Low match, only very limited job functions are available and match group 5) No match, no job functions

not appreciate woman participating on the labour market. The following quotation expressed by the Minister of Employment illustrates this point:

“We cannot ignore that this is about culture. We know that thousands of immigrant women receive social assistance and are totally outside the labour market, and has never held a regular job. We also know that this situation is often caused by a culture, in which it is not welcome that women work. That is exactly why we have to be aware of complaints. We will not say okay to a view on women, were women and men not are equal, and therefore are forced to stay at home and take care of the children. The women do not become integrated this way. And what is worse – their children do not either. (Translated quotation, by the Minister of Employment: Jyllands-Posten: 14.4.2007)

Besides assumptions about the impact of culture on gender equality among immigrants differences in the extent to which immigrant men and women participate on the labour market has by the government been emphasized as an indicator of gender inequality among immigrants (e.g. The Danish Government, 2003).

4. Norway: From local discretion to standardized rates for payment

The over-representation of immigrants among social assistance recipients, and the risk of welfare dependency and clientification has since the 1980s been noticed but is was especially highlighted as a crucial problem in a government white paper named *‘Concerning immigration and the multicultural Norway’* from 1997 (St. meld. 1996-97), which was the first government white paper that primarily addressed integration issues in Norway (Hagelund, 2002).

On basis of the concerns in this government white paper, a cross-ministerial working-group was settled in order to explore how the relationship between active participation and public income support could be improved in order to avoid clientification etc. The cross-ministerial working group proposed that a special introduction benefit for newly arrived immigrants was introduced.

Afterwards, in a government white paper (St.meld. 1998/1999, 50) the government decided to introduce a special benefit for newly arrived immigrants and the so-called Introduction law commission was set up and commissioned to review and submit proposals concerning a new legislation about economic support for newly arrived immigrants.

In 2001 the commission finished their work and their proposals was submitted (NOU, 2001:20). Finally, in 2004 a new Introduction law and an Introduction allowance for newly arrived immigrants were introduced in Norway, which were supposed to stimulate and motivate the target group to remain in the programme, and at the same time promote the transition to active participation in the labour market (Ot.prp, 2002/03: 28).

In many ways this Introduction allowance differed from social assistance benefit: First of all the Introduction allowance is a fixed-rate benefit, where the social assistance is means-tested. Hence, it is equal for everyone regardless of place of residence and conditioned upon active participation in activities. For participation in a programme the annual benefit is equivalent to twice the Basic amount from the National Insurance Scheme. Participants under 25 years of age receive 2/3 of the

benefit. The programme lasts for up to two years. In the event of absence, which is not due to illness or other compelling welfare reasons, and for which permission has not been given, the benefit is reduced correspondingly. Nor will benefits be reduced on account of any child support received (Source: The Act on an introduction programme and Norwegian language training for newly arrived immigrants).

According to the administrative framework related to social assistance schemes in Norway, the municipalities were also before the Introduction allowance was launched in 2004, entitled to use sanctions in the event of non-attendance in an activation program, but as mentioned, it was largely left to local and professional discretion to use sanctions. The practice varied, therefore, from municipality to municipality and economic sanctions were often not taken into use (reference).

What is interesting about the Norwegian case is that the administrative framework related to the Introduction allowance in many ways differs from the provision of social assistance in Norway in general, where the degree of local autonomy is high and the social assistance to a large extent means-tested. Compared to this the Introduction allowance is a fixed-rated benefit where the Norwegian government has created standardized rates for payment, and the Norwegian allowance is even more standardized than the Danish version, which is standardized but also contains some means-tested elements.

Upon completing the programme, immigrants become a part of the ordinary social security system and are subject to the same rules as Norwegian nationals.

As mentioned, the ambition with this Introduction allowance was, among other things, to get people out of the social assistance system and to fight clientification (Ot.prp, 2002/03: 28). Clientification and the over-representation of immigrants among long-term receivers of social assistance were also in 1997 highlighted as main problems, which the existing social assistance system could not handle. But how the Introduction allowance exactly should look and the exact features were for a long period reviewed in the Introduction law commission.

According to Rune Solberg (Interview, May 2010), civil servant in the Ministry of Labour in Norway and also a member of the Introduction law commission, it was necessary to go one step further than the existing social assistance system, which is why the Introduction allowance in Norway in many ways follows the same line as that of the Danish.

The means-tested character of the social assistance benefit was up for discussion in the preparatory work in the commission. Because the social assistance level in Norway was means-tested, the level of benefit some families received could easily become very high, among other things because many immigrants was in need of extra support for housing, children etc. In addition to this it was emphasised as very important by the government that the Introduction allowance serves as an alternative to social assistance (Ot.prp, 2002/03: 28). Therefore it was important that the introduction benefit was not too high and not too low.

According to Rune Solberg, the standardized rates for payment, which stems from the Introduction programmes, have giving rise to new initiatives in the general social assistance system in Norway. Hence, the so called Qualification Programme, and the related qualification

benefit for long-term recipients of social assistance for persons with substantially reduced working capacities and earning abilities, launched in a government paper in 2007 (St.meld.nr. 9 2006-2007:15-17), share several features with the Introduction programme and the Introduction allowance. For this reason, the qualification benefit is also a standardised rate for payment at the same level as the introduction allowance, and the qualification benefit will be reduced as long as they take part in the programme.

Also the New Chance from 2005, which is a program targeting immigrants who have stayed in the country for two years or more, is a kind of replica of the Introduction program.

5. Sweden

Also in Sweden the question about 'welfare dependency' among immigrants has been up for discussion for several years.

In 1985 a forerunner to the Introduction programme was introduced in Sweden. In addition to a new settlement policy – The 'Across Sweden strategy' - an 18 months of Introduction period was launched. Prior to 1985, the Swedish Labor Market Board handled refugee issues due to the fact that immigrants earlier primarily entered Sweden for labour market reasons (Edin et al 2004: 136-138). In 1985 the responsibility for refugee issued was moved to the Swedish immigration board which meant that the direct link to labour market policy was dismissed. At the same time a strict settlement policy was introduced.

What is interesting about this reform in 1985 is not so much that a strict settlement policy was launched (which among other things entailed that refugees sometimes were placed in municipalities where there was no jobs to be found) but more the practice were immigrants, by default, were placed on welfare for an introductory period of about 18 months. Thus, it seems that the new policy effectively shifted the focus from labour market integration to income support. Prior to the reform newly arrived immigrants were also eligible for social assistance after receiving their residence permits (Edin et al. 2004) – but they were not by default placed on public income support.

The 1985-reform has afterwards been subject to a lot of criticism (e.g. Brekke & Borchgrevink, 2007) - among other things because the labour market orientation was weakened - and the fact that newly arrived immigrants (primarily refugees) were placed on welfare for 18 months has been accused for leading to clientisation and welfare dependency.

In 1993 a Swedish version of the introduction allowance was launched, which in several ways differs from the Norwegian and Danish versions. Hence, since 1993, the municipalities in Sweden have also been encouraged to grant individuals participating in an introduction programme an Introduction allowance rather than social assistance. The objective of the Introduction allowance is to emphasize the special character of the allowance granted during the first period of time in Sweden, and to avoid the notion among immigrants that social assistance is a normal means of support for immigrants (Lemaitre, 2007: 16). Contrary to the Danish and Norwegian programmes, the Swedish programmes are voluntary for as well the municipalities as for the newcomers.

Therefore the Introduction allowance only serves as an alternative to social assistance. Also the size of the introduction allowance depends on the municipality (Djuve & Kavli, 2007), and they also decide whether absence from participation should be punished.

In some municipalities the amount is the same as regular social assistance, while other municipalities have chosen an allowance, which is the equivalent of minimum wage (Lemaitre, 2007: 16). Because the implementation of the introduction allowance varies from municipality to municipality, it is difficult to obtain a comprehensive overview of the different levels provided. Nevertheless, an investigation of the municipalities from 2007 finds, that in roughly 40 per cent of the municipalities, the introduction allowance is equal to the regular social assistance. In addition to this, a study from 2000 found that in 60 per cent of the municipalities who had taken the law into use, the level of the introduction allowance was higher than the social assistance level (Integrationsverket, 2007).

Upon completing the programme, immigrants become, like in Norway, a part of the ordinary social security system and are subject to the same rules as Swedish nationals.

Before the Introduction allowance was introduced in 1993 a working group was set up in 1991 to examine and discuss alternative income sources for newly arrived immigrants (in particular refugees). An important theme in this discussion was the autonomy of the municipalities (Proposition 1991/92: 174). Different alternatives were up for discussion, among other things a standardized rate for payment (a fixed-rate benefit regardless of place of residence). At that time the members of the workgroup assessed that a standardized rate of payment in all the municipalities would be too detail-regulating and might assist in an erosion of the autonomy of the municipalities (Proposition 1991/92:172). The kind of Introduction allowance the workgroup ended up suggesting to the government was instead a more voluntary version (see above). Therefore, the local discretion was maintained and the Introduction allowance did not break with the administrative framework related to the social assistance programs in Sweden. Since 1993 the Swedish Introduction program has been voluntary for as well the municipalities as for the newcomers. Up until now the administrative framework for delivering the introduction allowance has therefore been much less decentralized than in Norway and Denmark, and rights for the newcomers have been substantially more important than duties (Djuve & Kavli, 2007). But several circumstances indicate that this soon will come to an end.

As mentioned, after the liberal government came into office in 2006, the question about the effort and income sources provided for newly arrived immigrants have been up for discussion. In 2007 a commission was set up with the remit to review and submit proposals concerning responsibility, design, and financing of refugee reception and other initiatives for newly arrived refugees and people otherwise in need of protection and their relatives. In June 2008 the commission finished their work (SOU 2008, 58). The commission submitted several proposals: One of them is to introduce individual introduction compensation, which is individual (i.e. not dependent on the aggregate income of the household) and standardized (SOU 2008, 58: 32).

In November 2009 the Swedish government presented a proposition (Proposition 2009/10, 60), which is based on many of the proposals the commission submitted in 2008, and a government

reform named – ‘Labour market introduction of newly arrived immigrants – individual responsibility with professional support’ is now underway (December 2010).

The Introduction allowance, which is proposed by the government, in many ways follows the same line and considerations as the Introduction allowance in Norway⁵. More precisely what the Swedish government is proposing is: ‘A new benefit that is the same for everyone regardless of where in the country one lives is paid to new arrivals when they actively participates in introduction activities’ (Government Offices of Sweden, December 2009).

Therefore, the ground is prepared for a standardized and individual Introduction allowance, where the level of money will depend directly on active participation. If the reform is implemented in Sweden we will also see an Introduction allowance for newly arrived immigrants which differ from the administrative framework build in the Swedish social assistance scheme.

6. Conclusion and discussion

This paper has analyzed how social assistance schemes in the three countries have ‘coped’ with the increasing number of receivers with an immigrant background and two questions were raised: To which extent do we see similarities and differences across the three countries in the way the immigrant dimension has been incorporated in the social assistance schemes and do social assistance measures targeted at immigrants differ from the institutional preconditions within each country.

Denmark is for several reasons the country which – when it comes to social assistance measures targeted at immigrants - stands mostly out from the other and which differs most from the institutional preconditions within the country. Not only has a specific benefit for newly arrived been introduced – but we have also seen de facto changes targeted at immigrants in the general social assistance system. Furthermore, it appears quite clear that Denmark is the only country which has repeatedly reduced the benefit level provided for immigrants – which has not been the case in Norway in Sweden. Taking the (in many ways) common normative foundation behind the three countries into account, this difference is remarkable.

When it comes to the question about benefits provided for immigrants, and the potentially impact of generous welfare benefit levels on the so-called ‘dependency culture’, we have seen three different tendencies and discussions in the three countries. In Denmark the benefit level and the discussion about economic incentives have been crucial within research communities and in the public debate since the late 1990s as this discussion together with political mobilization have resulted in several policy changes.

In Norway the relation between rights and duties has been crucial since the late 1990s. Do social benefits – without obligations – end up with a kind of *clientisation* and a dependency culture? These considerations have resulted in the introduction of the Introduction allowance. In Sweden

⁵ The Swedish introduction allowance, which is now being negotiated, does also differ from the Norwegian version in several ways

up until today rights have been much more emphasized than duties but from December 2010 rights will probably be much more important.

In many ways the measures targeted at immigrants (newly arrived as well as groups who have stayed in the country for several years) stand out from the social assistance schemes within the three countries. Hence, measures targeted at immigrants in Denmark differ from principles such as social rights and providing generous benefit. Also compared to tendencies in Danish activation policies these benefit reductions stand out. But when the Introduction allowance was introduced in Denmark in 1999 it did not differ much from the administrative framework related to social assistance benefits. The Introduction allowance in Norway is more standardized than what is the case for social assistance schemes in general, where the degree of local autonomy is high and the social assistance to a large extent means-tested.

When the Introduction allowance was introduced in Sweden in 1993, it did not differ much from the existing practices and institutional preconditions, and it was highlighted as important that it did not erase local discretion and autonomy of the municipalities – but this will probably soon be the case.

Although the analysis of how the social assistance schemes in the three countries have handled the increased number of immigrants is fairly short and only concerns one small area, it gives the impression that we have to do with an interesting pattern, where institutional preconditions in the social assistance schemes at some times prevail when new measures targeted at immigrants are to be introduced (like in Sweden in the early 1990s), while countries at other times totally break with existing institutions, practices and principles (like the benefit reductions in Denmark and the Introduction allowance in Norway).

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