
The achievement of female suffrage in Europe: on women's citizenship

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This article lays out the theoretical framing underlying the gendered construction of citizenship in Western political thought during the transition to modernity; describes the relevant actors in the fight for female suffrage and the impact that the separate spheres of ideology had on both the narratives supporting and resisting female suffrage, and on the selective and piecemeal way in which suffrage was eventually won by women in European countries. Furthermore, it identifies the main factors accounting for women's earlier or later achievement of suffrage in different European nations and, exploring the connection between women's access to voting rights and to civil and social rights, it retells a story of women's citizenship which is an inverted image of that developed by T.H. Marshall on the basis of the male paradigm. It finally brings us to the present to discuss the persistent political under-representation of women in Europe, as well as a growing awareness about the need to ensure women's full citizenship through measures that seek the incorporation of women in male spheres of power and the disestablishment of the sexual contract, something which the historical conquest of suffrage could not achieve by itself.

1. Introduction

Some fifteen years ago, political theorist Carole Pateman deplored the fact that we still knew remarkably little about how women had won the vote in different parts of the world.¹ This gap in knowledge regarding women's constitutional history included Europe, where, with the exception of just a handful of countries, such as France or the UK, little comparative research had been done on this question with obvious implications for women's status as citizens in constitutional democracies. This article summarizes the lessons from a recent book describing how women accessed suffrage and

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¹ Carole Pateman, *Three Questions about Womanhood Suffrage*, in *SUFFRAGE AND BEYOND: INTERNATIONAL FEMINIST PERSPECTIVES* 331 (Caroline Daley & Melanie Nolan eds., 1994).

came to inhabit the notion of citizenship in different European countries.² A comparative look at the history of women's right to vote across Europe helps us to understand what was at stake for women in the transition to modernity, and how modernity conceptualized women's citizenship. It helps to give us a notion of how important women's vote was for women and other actors, what factors stood in the way of women's suffrage, and what other considerations and events made it possible in different countries at different points of time in history. It also allows us to retell the history of citizenship, as a rights-holding status, from a woman's perspective, and to place women's persistent under-representation in traditionally male domains of power in a historical context.

This reminiscence of the history and unfolding of the concept of women's citizenship comes at a time when Europe's gender equality model is gradually departing from a narrowly conceived equal rights/opportunities framework in order to embrace a new democratic framework,³ which actively seeks the disestablishment of the separate spheres tradition that was entrenched, rather than challenged, with the consolidation of modern states in Europe.⁴ In doing so, Europe has been advancing towards women's full citizenship, a task only initiated when women were politically enfranchised, but has as of yet not been fully completed.

This article starts by laying out the theoretical framing underlying the gendered construction of citizenship in Western political thought during the transition to modernity (Section 2). Section 3 describes the relevant actors in the fight, including the Church and political parties, explaining their often paradoxical behavior as a result of collisions between principle and strategy. The specific contribution of, and challenges faced by, women's activism in general, and *suffragism* in particular, are described under Section 4. Section 5 discusses the impact that the separate spheres ideology had on both the narratives supporting and resisting female suffrage, and on the selective and piecemeal way in which suffrage was eventually won by women in European countries. Section 6 identifies the main factors and the synergies between them, accounting for women's earlier or later achievement of suffrage in different European nations. Section 7 explores the connection between women's access to voting rights and to civil and social rights, retelling a story of women's citizenship which is an inverted image of that developed by T.H. Marshall on the basis of the male paradigm. Section 8 concludes by bringing us to the present to discuss the persistent political under-representation of women in Europe, as well as a growing awareness about the need to ensure women's full citizenship through measures that seek the incorporation of women in male spheres of power and the disestablishment of the sexual contract, something which the historical conquest of suffrage could not achieve by itself.

² See *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE: VOTING TO BECOME CITIZENS* (Blanca Rodríguez-Ruiz & Ruth Rubio-Marín eds., 2012).

³ Ruth Rubio-Marín, *A New European Parity-Democracy Sex Equality Model and Why it Won't Fly in the US*, 60(1) *AM. J. COMP. L.* 99 (2012).

⁴ Blanca Rodríguez Ruiz & Ruth Rubio-Marín, *The gender of representation: On democracy, equality and parity*, 6(2) *INT'L J. CONST. L.* 287 (2008).

2. The theoretical framing: transition to modernity and female citizenship

Women's access to suffrage responded to the dynamics at play in the creation of modern states and the definition of male and female citizenship in the republican and liberal traditions of citizenship. In both these traditions, the new modern subject was from the start a gendered subject: namely, one shaped by symbolically male features, and represented as abstract, disembodied, rational, impartial, and independent. While the liberal tradition ignored sex-specific particularity, the republican one transcended it.⁵

Starting with the latter, with its roots in Aristotle and Machiavelli, the republican tradition conceived of citizens as economically independent, and therefore as having enough resources and time to devote themselves to the business of governing the city, and as politically autonomous in being able to form their own judgment about the common good without depending on superiors.⁶ It also prioritized citizen soldiers who, unlike mercenaries, were willing to defend the polity because they had a stake in it. Both arguments were combined in justifying the exclusion of women, an exclusion which the French Revolution reproduced. If men expressed their contribution to the common good, and thus their citizenship through their military duties, the republican model for women, and thus the container of their "citizenship persona," their sex-specific and nature-dictated form of patriotism, was motherhood. In their role as mothers, women were seen as reproductive vessels instilling love for republican virtues, and acting as guardians of virtues and morals.⁷ All of this was to take place in the private sphere, a sphere conceptualized as both separate and subordinate to the male-inhabited and male-defined public sphere. Thus, while during the French Revolution women were at first allowed to participate in public debates and meetings,⁸ already in 1793, women's clubs were being prohibited. It was not through their direct political participation that women were expected to contribute to the *res publica*. In fact, French women only got the right to vote as late as 1944.

Nor were women regarded as equal citizens in the liberal tradition. Liberalism was grounded in an axiological framework that aspired to be universal and transcend particularism. Calling on an undifferentiated human nature and conceiving of individuals as naturally free, it developed a language of freedom and rights. Yet, in the bourgeois society, where the liberal discourse developed, the only subjects and rights-holders were those endowed with property (including of the self), those who could sustain themselves,⁹ and those who were more generally subjected to no one.

⁵ RUTH LISTER, FIONA WILLIAMS, ANNELI ANTONEN, ET AL., *CITIZENSHIP: FEMINIST PERSPECTIVES* 71 (2d ed. 2003).

⁶ This of course was the reasoning used to justify the exclusion not only of women, but also of the poor, the non-tax-payers, the non-land-owners, and, in general, the working classes.

⁷ LISTER, *supra* note 5.

⁸ Joan B. Landes, *The Performance of Citizenship: Democracy, Gender and Difference in the French Revolution*, in *DEMOCRACY AND DIFFERENCE: CONTESTING THE BOUNDARIES OF THE POLITICAL* 305 (Seyla Benhabib ed., 1996).

⁹ RUTH LISTER, FIONA WILLIAMS, ANNELI ANTONEN, ET AL., *GENDERING CITIZENSHIP IN WESTERN EUROPE: NEW CHALLENGES FOR CITIZENSHIP IN A CROSS-NATIONAL CONTEXT* 21 (2007).

Just like republicanism, liberalism constructed the myth of the independence and self-sufficiency of the political being. To do this, liberalism shaped the individual as self-possessed. Self-ownership (the requirement that citizens own property in their own persons) was recognized as the basis for political subjects, and constituted the move by which women, as creatures of feeling and not reason, were excluded from the polity.¹⁰ Women remained excluded even when, with the advances of industrialization and the workers' class struggle, the "property/liberty" connection to citizenship was expanded to include not only ownership, but also capacity of producing property through wage labor, and the economic domain—as opposed to just the political domain—became increasingly perceived as a "public" domain.¹¹ Women were primarily defined simply as property in the private, and this precluded their capacity to benefit from ownership in the public.¹² In other words, liberalism constructed a self-possessed individual as male, displacing the manifestations of men's dependency linked to social reproduction onto women. This resulted in modernity sealing a sexual contract,¹³ a contract of fraternity, whereby men assigned women the role of sexual and reproductive labor, articulating a division of spheres and gender roles. Women, especially married women, often appeared as the flip-side of autonomy, and were therefore excluded from the holding and/or managing of property, all or some forms of paid employment and professions, as well as political participation. Even in Britain, the country with the oldest form of parliamentary representation, women did not get full voting rights before 1928, and this only after long and convoluted struggles.¹⁴

The separation of spheres and the relegation of women to that of domesticity, as both a distinctly female sphere, but also a subordinate domain, was thereby at the foundation of modern democracies. While in French law, the obedience and subordination of the wife under her master's command was conceptualized as a republican virtue, legitimized by the superior interest of the public good, in English common law, the regime of community of the spouses, the so-called common-law doctrine of

¹⁰ See Elizabeth Mayes, *Private Property, the Private Subject and Women*, in *FEMINISM CONFRONTS HOMO ECONOMICUS. GENDER, LAW AND SOCIETY* 119 (Martha Albertson Fineman & Terence Dougherty eds., 2005).

¹¹ See NITZA BERKOVITZ, *FROM MOTHERHOOD TO CITIZENSHIP: WOMEN'S RIGHTS AND INTERNATIONAL ORGANIZATIONS* 13 (1999).

¹² See Mayes, *supra* note 10, at 125. The private-property-holder paradigm was male too, relying on the model of an "owner-actor whose economic power derives from freedom of mobility, autonomy from relational limitations and a singular construction of responsibility."

¹³ *Id.*

¹⁴ The sexual contract was also at the foundation of the American Revolution. Despite the proclamation of the universalistic, democratic, and liberal rights on which it was based, it was also led by British-descended, North-American, male colonists, most of whom "led patriarchal families structured in accordance with English common law, with wives performing the duties assigned them by their ruling husbands." See Rogers M. Smith, *The Distinctive Barriers to Gender Equality*, in *HAS LIBERALISM FAILED WOMEN? ASSURING EQUAL REPRESENTATION IN EUROPE AND THE UNITED STATES 185, 186–187* (Jytte Klausen & Charles S. Maier eds., 2001). Indeed, women gained suffrage only with the passage of the XIXth Amendment to the US Constitution in 1920, and democratic theorists in America such as Alexis de Tocqueville were just as influenced by the separate spheres tradition as their European counterparts. See John Markoff, *Margins, Centers, and Democracy: The Paradigmatic History of Women's Suffrage*, 29(1) *SIGNS: J. WOMEN IN CULTURE & SOC'* 90 (2003).

coverture, meant that the woman lived under the “cover” of her husband, who—as the head of household—enjoyed the status of civil citizenship. The legal subordination of married women was more than a simple matter of exclusion: it helped to “define civil citizenship, for it was by protecting, subsuming and even owning others that white male property owners and family heads became citizens.”¹⁵

In the end, then, the republican as well as the liberal model converged in the basic differentiation between the public and the private sphere, relegating women to the latter. Indeed, most of the theoreticians of the bourgeois society (including Hegel, Kant, and Rousseau) insisted on the special role of women within the family, where a principle of dominance and hierarchy *vis-à-vis* married women went unchallenged in both the liberal property-ownership and the republican soldier/motherhood models. The principle of domination was secured by requiring the wife’s obedience and subordination to the husband’s “right of command” and by her economic dependence, anchored in the husband’s rights to administer her property and the earnings from her work.¹⁶ Domination and a gender-specific division of labor were jointly and foundationally established, and the tensions with the modern concept of citizenship, grounded on the principles of freedom and equality of all men, which signaled a radical break from traditional ideas of society as composed of natural hierarchies and inequalities, were simply waived away as being natural.

In view of this, it is hardly surprising that in many European countries the modern legal order in fact came to deprive women of the suffrage rights they had enjoyed under the political institutions of the “Ancient Regime,” linked to feudal notions of status or to the ownership of property. Where they existed, as in Sweden,¹⁷ the Netherlands,¹⁸ and some pre-unitary Italian states (including the Grand Duchy of Tuscany, Lombardy, and the Venetian Region),¹⁹ these rights were indeed the exception. They were granted to (some) noblewomen and to taxpaying women in some lands for some elections (often municipal or provincial), and were often indirect. However, far from expanding women’s voting rights along with men’s, both modern electoral laws and the new constitutions of the time came to deprive women of (or further restrict) their previous limited voting rights. Sometimes this was done by rendering explicit the idea that the gender-neutral formulation of the concept of “citizenship” meant in fact only men. This was notably the case with the electoral laws of 1848 in Hungary,²⁰ 1907 in the Austrian half of the Habsburg

¹⁵ Nancy Fraser & Linda Gordon, *Civil Citizenship Against Social Citizenship*, in *THE CONDITION OF CITIZENSHIP* 90, 88 (Bart van Steenberg ed., 1994).

¹⁶ LISTER ET AL., *supra* note 9, at 35.

¹⁷ Lena Wängnerud, *How Women Gained Suffrage in Sweden: A Weave of Alliances*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 241, at 242.

¹⁸ Inge Bleijenbergh & Jet Bussemaker, *The Women’s Vote in the Netherlands*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 175, at 177.

¹⁹ Susanna Mancini, *From the Struggle for Suffrage to the Construction of a Fragile Gender Citizenship: Italy 1861–2009*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 373, at 375.

²⁰ Csilla Kollonay-Lehoczky, *Development Defined by Paradoxes: Hungarian History and Female Suffrage*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 421, at 421.

Empire,²¹ 1865 in Italy,²² 1866 in Sweden,²³ and 1887 in the Netherlands,²⁴ all of which explicitly excluded women from the vote altogether.

3. Political actors in the struggle: between strategy and principle

The allocation of men and women to separate spheres was both a reality and a self-reinforcing ideological construct. They often converged in the creation of synergies accounting for the disassociation of men's and women's franchise and the impossibility of a single democratization agenda. Women often indeed lacked economic independence, education, paid employment, and professional opportunities similar to those of men at the time of the fight for universal suffrage. Women's relegation to the sphere of domesticity, where they were expected to reproduce and to nourish the mores and the traditional culture, allowed making predictions about the conservative, traditional, and religiously affected political behavior that women would have, had they been allowed to vote. To those most concerned with advancing the new modern order, these predictions often advised postponing female suffrage on strategic grounds in order to concentrate on what were perceived as the truly serious remnants of a "pre-modern" or "illegitimate" political order to be overcome, such as the lack of recognition of universal male suffrage or the limitation of non-democratically legitimized sources of authority, including that of the Monarchy or the Church; or that of imperial or colonial powers. Those in favor of female suffrage, often including conservative and religious parties, for the most part shared these predictions about women's nature and inclinations, and thus saw in the female electorate the possibility to preserve a threatened order from the excesses of modernity.

The prevalence of strategic reasoning, and the low profile of the enlightenment ideas of freedom, justice, and equality, in the discussion of female suffrage, are indeed noteworthy. Granted, some progressive political parties in several countries—including socialist, liberal, or republican parties—embraced the new enlightened language, and saw in the new modern state a true promise of rights and democracy for all, including women. Such principled language certainly bore some weight in some concrete cases, as in the debates about female suffrage held in the Spanish Constituent Assembly in 1931.²⁵ However, the European debate around female suffrage was overall widely dominated by strategy. Strategy prevailed in positions in favor of and against female suffrage and understandings about women's nature and likely behavior, as well as the prioritization of other political causes, had a clear impact on *when* female suffrage was recognized, and *whose actions* ended up being mainly responsible for it.

²¹ Birgitta Bader-Zaar, *Gaining the Vote in a World in Transition: Female Suffrage in Austria*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 191, at 192–203, 196.

²² Mancini, *supra* note 19, at 375.

²³ Wängnerud, *supra* note 17, at 242–243.

²⁴ Bleijenbergh & Bussemaker, *supra* note 18, at 177.

²⁵ Ana Aguado, *Constructing Women's Citizenship: The Conquest of Suffrage and Women's Political Rights in Spain*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 289, at 293–295.

The creation of mass parties at the end of the nineteenth century had turned women into attractive potential campaigners, and possibly even voters. Some political parties felt the urge to recruit women by appealing to causes dear to them. Sometimes this translated into support for female suffrage, yet most often it did not, and women remained mostly instrumental in achieving political parties' further aims. In several countries in particular, the fight for women's equal rights was regarded as a threat to workers' rights and livelihoods. Indeed, many socialist parties and other left-wing or progressive forces held an ambivalent position towards female suffrage. This means that they were willing to compromise equality-based commitments they embraced in theory, arguing at least for the postponement of female suffrage until male universal suffrage was achieved. Expanding the vote to women on the same conditions as men (which at the time often meant enfranchising only women of property or those who paid taxes) was seen as a direct threat to the socialist class struggle. Thus, although socialism in theory prided itself on supporting the cause of women's emancipation, the issue was considered secondary, or even subversive, with feminists' efforts by definition being suspected of bourgeois tendencies. The First International (1864–1867) was hostile toward wage labor for women and unenthusiastic about allowing women into politics. The Second International had a more positive attitude about the women's cause, but it adopted the official policy that prohibited cooperation with bourgeois groups.²⁶ Socialist women were simply expected to focus their energies on the socialist movement and not on women's rights.²⁷ In 1875, for instance, women's alleged reactionary political tendencies constituted the most important argument against including women's suffrage in the founding documents of the German Social Democratic Party.²⁸

Privileging class struggle was not the only relevant consideration, however. Nationalist struggles, and fights to limit the power of the Church and the monarchy, were often as important in explaining support or resistance to the franchise of women from political parties. In Luxemburg, to mention a case, liberals opposed female suffrage because they thought it would threaten their aspirations to limit the sovereign power of the Crown and the influence of the Catholic Church.²⁹ Similarly, in Italy, although “communists after World War II perceived women as crucial in the construction of consent within the newborn democracy,” they were still only half-heartedly committed to the cause, fearing the “Vatican's influence on women's vote.”³⁰

²⁶ Even among feminist socialists, clear commitment to suffrage for all men and women—as opposed to a strategy of male universal suffrage first—was only expressed in the First International Conference of Socialist Women held in 1907 in conjunction with the International Socialist Congress. Only after that did women delegates commit to mobilize the whole International for the cause. See BERKOVITCH, *supra* note 11, at 32–33.

²⁷ LEE ANN BANASZAK, *WHY MOVEMENTS SUCCEED OR FAIL: OPPORTUNITY, CULTURE AND THE STRUGGLE FOR WOMAN SUFFRAGE* 203 (1996).

²⁸ Ellen Carol DuBois, *Woman Suffrage around the World: Three Phases of Suffragist Internationalism*, in *SUFFRAGE AND BEYOND*, *supra* note 1, 252, at 253.

²⁹ Sonja Kmec, *Female Suffrage in Luxembourg*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 159, at 165.

³⁰ Mancini, *supra* note 19, at 383–384. In fact, communist militants would later blame women's “conservative vote” for the defeat of their party in the political elections of 1946 and 1948 (*id.* at 384).

In France too, “women’s right to vote was thus bound up with political struggles between religious and anticlerical movements, the former invoking tradition and often the monarchy, the latter supporting progress and the Republic,”³¹ something which explains why the Radical Party especially, but also the Socialist, and Communist Party, resisted female suffrage. Although, for the most part, women were expected to be, and indeed were, involved in struggles for autonomy against imperial or colonial powers, whenever female suffrage was thought to delay the country’s journey towards independence, it was also resisted on such grounds. This was, for instance, the case in Poland and Ireland: in the latter, the home rule debate, with its religious overtones, ensured tensions between gender equality and nationalist aspirations at the end of the nineteenth century and in the early twentieth century.³²

The easy predisposition of political parties to sacrifice justice for women and women’s aspirations for the sake of other “more important, urgent or compelling” causes meant that the achievement of female suffrage was many times the result of a joint effort between strange political bed-fellows. A combination of left-wing forces (defending female suffrage on principled grounds) and right-wing forces (doing the same on strategic grounds) was indeed not an uncommon formula. In Belgium, Catholics offered their support for universal male franchise, a Socialist claim, in return for Socialist support for local female franchise and, in the end, it was the Catholics and the Communists who submitted a bill granting women national suffrage to parliament in 1945.³³ In Luxembourg, female suffrage was achieved as a result of an alliance between the socialists supporting the cause on principle, and conservatives acting strategically in the belief that women would support Christian values, fight alcoholism, and support the Monarchy, all against the opposition of liberals (who feared women’s conservative vote).³⁴ Thus, ironically, in many European countries, Catholic and/or other conservative forces ended up supporting female suffrage in the belief that women would vote conservative, restrain the excesses of liberalism and the proletarian and revolutionary struggle, including communism and secularism, and uphold traditional family values. As a result of this, some countries experienced the emergence of a very conservative “Christian feminism.” This was the case in both France³⁵ and Italy,³⁶ especially after Pope Benedict XV’s declaration in favor of women’s enfranchisement in 1919.

³¹ Sylvie Chaperon, *The Difficult Struggle for Women’s Political Rights in France*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 305, at 314.

³² The situation in Poland can be found in Małgorzata Fuszara, *Polish Women’s Fight for Suffrage*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 143, at 146; and Ireland in Myrtle Hill, *Divisions and Debates: The Irish Suffrage Experience*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 257, at 261.

³³ Petra Meier, *Caught Between Strategic Positions and Principles of Equality: Female Suffrage in Belgium*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 407, at 412.

³⁴ See Kmec, *supra* note 29, at 166–168.

³⁵ See Chaperon, *supra* note 31, at 313–314.

³⁶ See Mancini, *supra* note 19, at 379.

4. Women's fight for female suffrage: *suffragism* and the challenge of speaking with a single voice

The sacrifice of women's full political rights for the sake of other political priorities meant that, to a large extent, women in the fight for female suffrage were unable to rely on the political-party structure system. At the same time, women's associations, which started to flourish in many parts of Europe around the mid-1850s, mostly led by educated, politically connected, and bourgeois women, often prioritized causes other than suffrage, including access to education, employment, and professional development. In fact, sharing many of the assumptions about the likeliness of women's regressive political behavior (at least until they became more politically educated, and had the means to ensure financial independence from their husbands and moral independence from the Church), many enlightened feminists too feared that female suffrage could hold back the reforms brought by liberalism and modernity.

Partly as a reaction to the inaction of all other relevant actors, including political parties, and partly expressing dissatisfaction with the limited agenda of women's bourgeois associations, suffragist organizations proliferated at the turn of the century forming a suffragist movement with international ambitions. The institutional features and tactics of suffragist organizations varied. Although most were independent organizations, many—including those which were often most successful—had party connections, and some were even created as a branch of a political party. While most pursued suffrage through the means accorded by the political system, some—notably the suffragettes in the UK—were more radical in their methods. They defended different forms of civil disobedience when necessary, and, like the members of the *Women's Social and Political Union* in Britain, engaged in very unconventional activities, which included arson and hunger strikes in prison, as expressions of what Mrs. Pankhurst called a “civil war” waged by women.³⁷

Nearly all of the organizations were in contact with, and were influenced by, the suffrage movements in other countries and international organizations. Indeed, the cause of female suffrage provided the first occasion for international mobilization in the fight for women's rights. The fight was spearheaded by the women's temperance movement, which, initially rooted in the US, had also gained an international dimension.³⁸ The emergence of a newly militant suffragism was influenced by the upsurge of socialist politics at the end of the nineteenth century, but was ideologically and organizationally independent from it. This form of suffragism had its roots in England, but its branches reached out over much of the rest of the world, with the *International Woman Suffrage Association* being established between 1899 and 1902. Initially viewed as a

³⁷ See Emmeline Pankhurst, *When Civil War is Waged by Women*, in *FEMINISM: THE ESSENTIAL HISTORICAL WRITINGS* 296 (Miriam Schneir ed., 1972).

³⁸ The Women's Christian Temperance Union (WCTU) was formed in the United States in 1874 as a conventional Protestant women's organization with a narrow moral reform focus; it went on to become a more ambitious and politically articulated organization. In 1884, it led to the formation of the World's Women's Christian Temperance Union, which had great impact in Australia and New Zealand's early winning of suffrage. See Dubois, *supra* note 28, at 256.

working class initiative, suffragist militancy ended up recruiting women of all venues, as it came to challenge dominant definitions of womanhood articulated around the separation of public and private spheres.³⁹

Although suffragist movements ended up making a significant contribution towards women's suffrage in most countries, the movement was also subject to internal disputes and divisions, similar to those encountered by women's movements more generally. These internal divisions and conflicts of loyalty made it often difficult to achieve a common front in the fight for women's suffrage. The sources of conflict differed, but were often interrelated. One serious source of divisiveness was the question of loyalty to a political party versus loyalty to the cause of women's franchise, or even, more generally, women's rights. Often, as mentioned, parties paid lip-service to women's empowerment, but were more than willing to postpone it. In the UK, for instance, the liberal government repeatedly disappointed women. Expressing frustration with the lack of commitment of a party to their cause, women were then compelled to organize separately, either within or outside the party. This was something that political parties did not always welcome. Indeed, they were often eager to discipline what was perceived as women's political promiscuity, limiting their ability to step outside the bounds of party lines in their pursuit of a common cause. Examples abound about the difficulties women fighting for suffrage encountered if they wished to transcend party allegiances. In Sweden, women rebelled against their party of reference (in this case the Conservative Party) by founding a separate branch, but then had great difficulty in participating in suffragist associations that recruited members from the entire political spectrum.⁴⁰ In Italy, "between 1906 and 1908, socialist, Catholic, and bourgeois women's associations cooperated intensively on the issue on women's suffrage, but this alliance did not last long."⁴¹ This is possibly one of the main reasons why female suffrage was achieved very late.

Particularly complex, as hinted earlier, was the relationship between feminism and socialism, and the way it pitted class against gender struggles. Indeed, by the early twentieth century, a strong feminist movement began to develop within international socialism. This movement had to struggle against both the sexism of male socialists and the social conservatism of middle-class women's movements. The largest socialist women's movements were formed in Germany, the United States, and Austria. Clara Zetkin became international socialism's best known leader. The movement embraced political equality as one of its main objectives, and proposed a distinctively socialist argument for women suffrage, based on the recognition that "the increasingly public character of women's labour had to be matched with an equally public political role."⁴² Socialist suffragists encouraged the creation of women-only international fora—from 1907 through 1915, an informal women's international with annual conferences took place—as well as independent women's organizations within socialist parties.

³⁹ *Id.* at 265.

⁴⁰ Wangnerud, *supra* note 17, at 250.

⁴¹ See Mancini, *supra* note 19, at 378.

⁴² Dubois, *supra* note 28, at 261, 263.

The fact that these saw the light of day in the United States, Austria, Scandinavia, and Germany, probably influenced women's faster track to suffrage in these countries as compared to others, such as France or Italy, where such semi-autonomous organizations never developed.⁴³ At the same time, collaboration beyond party lines remained a challenge. Although the Second International had a more positive attitude towards women's causes, it adopted an official policy that prohibited cooperation with bourgeois groups. A price was paid for disobedience. In Denmark, for instance, the Social Democratic Party never recognized an ideologically akin women's organization (in this case, the Social Democratic Women's Suffrage Association) because of its cooperation with women not affiliated to the party.

Participation in war, especially during World War I, also stood in the way of women making suffrage a common front and a clear priority. Thus, although the majority of suffragists in combatant countries advocated "preparedness, war work, and service to the state," some were decisively pacifist and led the formation of the international feminist pacifist network called the *Women's International League for Peace and Freedom*.⁴⁴ That the cause had the potential to split the suffrage movement in two is shown in the German example, where World War I ended up dividing German feminists into pacifists and nationalists supporting the war.⁴⁵

Divisions along ethno-cultural and racial lines, or nationalist struggles also divided women in many European countries. These divisions were not always insurmountable, but sometimes they truly were. In the complex social and political context of Habsburg Austria, ethnic and nationalistic loyalties, as well as suffrage struggles between liberals, socialists, and Catholics, got in the way of a united suffrage movement.⁴⁶ Similar was the case of Switzerland, where tension between socialists and Catholic movements had the effect of dividing the suffrage organizations, and the cultural differences and language barriers between the different regions made a unified effort difficult to achieve.⁴⁷ The language question also caused a division of the Finnish Women's Association.⁴⁸ In Ireland, membership in suffrage societies was depleted by defections to newly formed female nationalist or unionist organizations.⁴⁹ On the other side of the Atlantic, the split of the movement also took place over racial justice issues. In the US, Elizabeth Cady Stanton and Susan B. Anthony of the more radical National Woman's Suffrage Association broke with the abolition tradition. Advocating women's rights first and foremost, they opposed the ratification of the XVth Amendment, arguing that it put black enfranchisement ahead of women.

⁴³ *Id.* at 263.

⁴⁴ *Id.* at 269.

⁴⁵ See Ute Sacksofsky, *Winning Women's Vote in Germany*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 127, at 134.

⁴⁶ See Bader-Zaar, *supra* note 21, at 191, at 191–202.

⁴⁷ See BANASZAK, *supra* note 72, at 203–206, 211–212; BEATRIX MESMER, AUSGEKLAMMERT, EINGEKLAMMERT: FRAUEN UND FRAUENORGANISATIONEN IN DER SCHWEIZ DES 19. JAHRHUNDERTS 92, 187 (1988).

⁴⁸ See Aura Korppi-Tommola, *A Long Tradition of Equality: Women's Suffrage in Finland*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 47, at 49.

⁴⁹ See Hill, *supra* note 32, at 261.

Instead, the more moderate American Woman Suffrage Association maintained its alliance with the old abolition cause.⁵⁰

Beyond institutional struggles and fights about the importance of engaging in causes other than women's emancipation, many of the tensions were truly internal to the women's emancipation movement—including suffragist organizations. These tensions had to do with the relative importance of women's suffrage in the quest for women's liberation: an instance of the feminist movement's difficulty speaking in a single voice. In general, while proletarian women fought for equal pay for equal work, the extension of protection of maternity rights, and employment protection for women, middle-class women struggled first and foremost for access to education and professional training, regarding access to higher education as a prerequisite for active citizenship.⁵¹

A related source of dispute was the question of whether full and equal suffrage should be granted to all women or only to those who were educated and literate, reflecting a tension between a transformative enlightened agenda, on the one hand, and inclusive politics, on the other. In Britain, suffragists struggled over whether to go for female votes on the same basis as men (that is, as householders), which was the position of most suffragists, or rather to begin by trying to obtain voting rights for unmarried women, as some suffragist argued in the 1870s and 1880s.⁵² In Greece, for instance, a couple of years after women had been granted limited voting rights, the suffragist movement split between those who opposed anything but full suffrage rights for local elections, and those who insisted on women retaining the voting rights they already had, with most upper- and middle-class educated people (women and men alike) contesting universal suffrage for women.⁵³

5. The power of ideology: women's enfranchisement, motherhood and the sexual contract

The fact that at the time political parties did not care enough, or cared more about other things, and that women's movements did not easily agree on the absolute and relative importance of suffrage is only part of the story behind the delayed enfranchisement of women. A careful look at the positions of many of the relevant actors in several European countries shows the resistance exercised by the dominant ideology affirming the separate spheres tradition. Tellingly, many of the arguments either in support of, or against, the franchise alluded explicitly to women's distinct position or experience in the family, and to their caring nature as mothers.

⁵⁰ See JANET ZOLLINGER GIELE, *TWO PATHS TO WOMEN'S EQUALITY: TEMPERENCE, SUFFRAGE, AND THE ORIGINS OF MODERN FEMINISM* 114 (1995).

⁵¹ LISTER ET AL., *supra* note 9, at 38.

⁵² See Krista Cowman, *Female Suffrage in Great Britain*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 273, at 275–276.

⁵³ See Demetra Samiou, *So Difficult to be Considered as Citizens: The History of Women's Suffrage in Greece, 1864–2001*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 439, at 444.

Arguments concerning women's caring nature and their role as mothers, as well as their political relevance, were most often relied upon by conservative political forces opposing female suffrage. Female suffrage, it was said, was politically contentious because it could undermine family harmony and generate social instability. Instead, women were to be represented by the men, as the heads of the family household. Two contradictory arguments were thus lumped together. On the one hand, the argument that women's suffrage was unnecessary, because "their men" already represented women's interests, assumed unity of interests as the only conceivable scenario. On the other hand, the idea that women's suffrage could disrupt family harmony rests on the possibility of a clash of interests, and advocates the subordination of women as the only solution. In Sweden, for instance, a parliamentary commission was formed and put in charge of investigating the potential consequences of female suffrage on birth rates and marriage.⁵⁴ And in the UK, one of the arguments that Liberal Prime Minister William Gladstone held in stubborn resistance to female suffrage was that women could be potentially corrupted by politics, and thereby threaten the family.⁵⁵

The perception of suffrage as a threat to the family order also explained why women, seeing suffrage as threatening the natural order of things, sometimes went as far as to organize against their own enfranchisement. In Britain, for instance, women were active in the National League for Opposing Women's Suffrage, founded in 1908.⁵⁶ The separate spheres tradition held out the promise of "economic subsistence and a defined social place as a wife to women from all respectable classes."⁵⁷ And whereas women's economic opportunities had indeed improved by the end of the nineteenth century, they were still very limited. So much so that working-class women had reasons to fear having to compete economically against men, as anti-suffragists claimed they would be compelled to do if the sexed-order of society came to be challenged.⁵⁸ Also, middle-class husbands could offer their wives a more comfortable existence than spinsters could provide for themselves.⁵⁹

While some feared that women's vote would disrupt family life, the argument that, as mothers and providers of care, women were unsuited for political concerns was sometimes turned on its head. Not only did suffragists draw on the examples of Australia and New Zealand to show that votes for women had not led to a neglect of homes and families,⁶⁰ many also sustained that, on the contrary, motherhood made for good and caring citizens, particularly suited to act in local politics.⁶¹ Women's

⁵⁴ Wangnerud, *supra* note 17, at 248.

⁵⁵ Hill, *supra* note 32, at 265, quoting from citations in SUSAN K. KENT, *SEX AND SUFFRAGE IN BRITAIN 1860–1914*, at 54–55 (1990).

⁵⁶ See Cowman, *supra* note 52, at 285.

⁵⁷ Pateman, *supra* note 1, at 341.

⁵⁸ *Id.*

⁵⁹ *Id.*

⁶⁰ MARIAN SAWER & MARIAN SIMMS, *A WOMAN'S PLACE: WOMEN AND POLITICS IN AUSTRALIA 10–16* (2d ed. 1993).

⁶¹ These arguments connect with some current positions on citizenship in general, and on women's citizenship in particular. See, in this line, Nancy Fraser's proposal of a model of citizenship based on the notion of the universal caregiver: Nancy Fraser, *Gender Equity and the Welfare State: A Postindustrial Thought Experiment*, in *DEMOCRACY AND DIFFERENCE*, *supra* note 8, 219, at 234–236. See also Joan Tronto, *Care as the Work of Citizens. A Modest Proposal*, in *WOMEN AND CITIZENSHIP 130* (Marilyn Friedman ed., 2003).

alleged nature, suited for home work and caring, was relied upon by the conservative camp in those instances where they supported their political inclusion. The nation would benefit if women's natural inclinations to care were put to public service, it was argued, especially at a time when the legislative concern with social welfare was increasing. If women were included in the public sphere, they would stand for patriotic motherhood.

Interestingly, many women and even female activists shared the view that men's and women's contributions to the nation were of a different kind, pertaining to different spheres. Indeed, as discussed, not all women's organizations placed suffrage rights among their priority demands. But even among those that did, the key dividing line was between egalitarians and "maternalists." The former relied on considerations of justice, calling on the universal language of individual freedom and equality, and underscoring the fact that what prevented women from participating in the public world was not nature itself but men's monopoly on education, training, paid employment, and suffrage.⁶² The latter based their claims on the different, particular role and needs of women, drawing both on maternal values and women's caring approach to life, which, they said, could and should be put in the service of the national interest.⁶³ Further, many middle-class and working class suffragists linked the vote to women's economic independence, regarding it as a way to improve their working conditions and their positions as workers in male-dominated workplaces. But for other suffragists, including those who were recruited from the women's temperance movement, suffrage was vital to strengthen women's position in private life, and eliminate men's domestic tyranny.⁶⁴ It seems that in the end pro-suffrage voices often managed to successfully combine several types of arguments in arguing their case, some affirming and some subverting the separate spheres ideology.⁶⁵

Most European countries ended up articulating a compromise between approaches to women's nature and social roles by limiting the suffrage granted to them to either some forms of political participation or some groups of women, in ways that would affirm rather than challenge the separate spheres tradition. In many countries, including the UK, Sweden, Belgium, Denmark, and Romania, women were granted the right to vote in local elections while still excluded from parliamentary elections. This disjuncture is understandable if we bear in mind that, while national voting was perceived as the primary sphere of politics proper, local politics was often regarded as an extension of family and neighborhood concerns. Women's participation in local politics could thus be seen as an extension of women's private tasks, or, in other words, as putting to public use the caring and managing skills developed by

⁶² This was the argument most heavily relied upon by the International Women Suffrage Association. See BERKOVITCH, *supra* note 11, at 26.

⁶³ LISTER ET AL., *supra* note 9, at 39.

⁶⁴ Indeed, the temperance cause was addressed to those who defined women as particularly responsible for personal and domestic concerns. Its main mission was to protect families from the "rum cause" (that is, drunk men) through the imposition of legal restrictions, for which women's vote was needed. In this way, the good of the family and political equality were reconciled. BERKOVITCH, *supra* note 11, 29.

⁶⁵ Pateman, *supra* note 1, at 337.

women in the private domain, while still leaving the public arena to men.⁶⁶ This also explains why, before they gained suffrage, women were also allowed to participate in school boards in the UK and boards of guardians for the distribution of relief to sick, unemployed, widowed, and destitute in both the UK and Ireland,⁶⁷ as well as in social aid boards and councils addressing the needs of children and the young in Denmark.⁶⁸

The gradual approach to women's political inclusion was consistent with the drawing of lines not only between types of suffrage and forms of participation and public involvement, but also between types of women. In many European countries, women who were functionally seen as closer to men (instead of neatly nested in the sexual contract) were put on a faster track to political participation. This functional closeness of women to men was measured in terms of both economic self-sufficiency and marital/family status. Women who paid taxes, owned property, and were heads of households, economically active, unmarried or widowed, were among those who were often prioritized in this process of selective enfranchisement. In the UK, for instance, female suffrage was first granted to women with property,⁶⁹ while in Finland, Iceland, and Sweden (though not in Denmark) unmarried and economically active women gained the vote before other groups.⁷⁰ Functional closeness to men and departure from standard gender norms were thus primordial criterion for selective inclusion, as long as a woman did not fall within the category of "deviant," as this could disqualify them. In some countries, such as Belgium, adulterous women and female prostitutes were explicitly left out.⁷¹ Similarly, Italy excluded "visible" prostitutes in 1945.⁷²

6. The achievement of female suffrage: triggering factors, synergies, and paradigms

Looking at the histories behind the achievement of women's citizenship in different European countries over many decades (from the turn of the century and into the 1970s), it is impossible to identify a single pattern in the path towards full female enfranchising. What we can identify, however, are some factors which contributed to, or delayed, women's access to suffrage, as well as the types of positive and negative synergies that their interactions generated. Some of these findings seem to unsettle common understanding held thus far, mainly by adding complexity.

⁶⁶ *Id.* at 339.

⁶⁷ See Cowman, *supra* note 52, at 275; Hill, *supra* note 32, at 260.

⁶⁸ See Christina Fiig & Birte Siim, *Democratisation of Denmark: The Inclusion of Women in Political Citizenship*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 61, at 66.

⁶⁹ See Cowman, *supra* note 52, at 273.

⁷⁰ See Fiig & Siim, *supra* note 68, at 72; ANN-DORTHE CHRISTENSEN & BIRTE SIIM, *KØN, DEMOKRATI OG MODERNITET. MOD NYE POLITISKE IDENTITETER* 63–64 (2001). For Finland, see also Korppi-Tommola, *supra* note 48, at 49. Concerning Sweden, see also Wangnerud, *supra* note 17, at 243.

⁷¹ Meier, *supra* note 33, at 412.

⁷² Mancini, *supra* note 19, at 382.

6.1. Contributing factors: unsettling common understandings, adding complexity

With a few dramatic exceptions, notably the cases of England and the United States, the achievement of suffrage at the turn of the century has often been linked to governments granting the vote to women in a calculated, top-down, and self-interested manner. Similarly, it has been a common understanding that women's enfranchisement was "on the whole a conservative endeavor, both as regards the forces responsible for achieving votes for women and the impact that women's votes had on political life."⁷³

However, a careful look at the histories behind the achievement of female suffrage in most European countries shows these to be overbroad generalizations. We have mentioned how, in some countries, conservative forces—sometimes including the Church and confessional parties—were indeed crucial for the granting of women's suffrage before World War II. Yet, the stories are more complex than that for it was often the alliance between conservative and progressive or left-wing forces that triggered the change. In Italy and Belgium, for example, we actually find communists aligning themselves with conservative parties to overcome the ambivalence or passive resistance of other parties, including the socialists and the liberals in support of female suffrage.⁷⁴ And stories abound about liberal and socialist parties, and key figures within them, which played key roles in supporting women's suffrage, often in alliance with women's groups and suffragists.

Describing women's access to suffrage as a top-down process also fails to reflect the importance of women's suffrage movements, and their internationally organized contribution to fighting women's marginalization in the politics of each nation. In fact, women's determined efforts through the organized labor of feminist movements demanding the vote for women is one of the factors explaining why in some countries women were enfranchised before, or at the end of the war, whereas in others they had to wait longer.⁷⁵ Indeed, between 1890 and 1930, it was the number of national women's political organizations demanding the extension of women's suffrage in a certain country which mostly determined the likelihood of women gaining suffrage.⁷⁶

⁷³ *But see* Dubois, *supra* note 28, at 252, referring to RICHARD EVANS's classic survey, *THE FEMINISTS* (1978), arguing that this is unsubstantiated by empirical research. Regarding the US, *see also* Holly J. McCammon & Karen E. Campbell, *Winning the Vote in the West: The Political Successes of the Women's Suffrage Movements, 1866–1919*, 15(1) *GENDER & SOC'Y* 55 (2001), challenging the standard account which gives responsibility to a primarily native, white, male constituency that believed that female voters would bring Puritan norms of behavior into public life, supporting laws restricting saloons and other venues of gambling and prostitution. They argue that, instead, women's access to suffrage came as a result of suffrage movements' mobilization as well as contextual factors, including whether major political parties endorsed them and whether women were already moving into male domains, particularly in higher education and in the professions.

⁷⁴ In Italy, before the end of World War II, Communists and Christian Democrats agreed on supporting the women's vote (Mancini, *supra* note 19, at 381). In Belgium, after World War II, the Catholic and the Communist parties submitted a bill to parliament that would grant women suffrage in 1948. *See* Meier, *supra* note 33, at 412.

⁷⁵ Pateman, *supra* note 1, at 342.

⁷⁶ *See* Francisco O. Ramirez, Yasemin Soysal, and Suzanne Shanahan, *The Changing Logic of Political Citizenship: Cross-National Acquisition of Women's Suffrage Rights, 1890 to 1990*, 62(5) *AM. SOC. REV.* 739 (1997).

Nevertheless, in some countries, the achievement of female suffrage *was* indeed a top-down process. Some have related this to the fact that from 1931 onwards, and especially after World War II, it was “international standards, world culture and isomorphism” that become most influential.⁷⁷ With worldwide decolonization and the reorganization of international politics after World War II, as well as the rise of a truly international women’s movement, national independence became a major catalyst, universal franchise being associated with struggles for democracy and the birth of the nation-state.⁷⁸ By the last quarter of the twentieth century at the very latest, female suffrage had simply become part of the definition of what a modern democracy was about. Those who fought to bring about a passage to democratization, demanding the enlargement of suffrage to include previously excluded racial categories, the end of the one party rule, or the conversion of old monarchies into parliamentary monarchies, almost never attempted an electoral system in which women and men would not be treated equally.⁷⁹ For latecomers to women’s full and equal suffrage rights, such as Cyprus or Malta, female suffrage was indeed mostly the result of the implementation of more or less self-imposed international democratic standards representing modernization.⁸⁰

Because sometimes women won the right to vote during, or immediately after, World War I, it has also been commonplace to grant the war itself a positive role in the achievement of female suffrage.⁸¹ In some countries, women were indeed rewarded for their active contribution to war effort. Additionally, in wartime and during postwar reconstruction, the close family household was often torn apart, with women being pushed into work and public services in a way that rendered the fiction of women’s relegation to the private sphere more difficult to sustain. This being said, focusing too strongly on the war as the main explanatory cause again undermines the work of generations of feminists. Besides, the correlation is far from clear-cut. After all, whereas some neutral countries, such as the Netherlands or Scandinavian countries, were among the first to grant women the franchise, some combatant countries, including France, Italy, and Belgium, only enfranchised women after World War II. In other countries, such as England, women’s war contributions played a role in granting women the vote, but, more than anything, the war seems to have “provided time and a supra-partisan environment for the political forces necessary to enfranchise women to mature.”⁸² Yet, in other countries, such as Germany and Austria, “defeat and revolution brought in socialist governments which enfranchised women,” and this has been

⁷⁷ *Id.*

⁷⁸ *Id.*

⁷⁹ See Sylvia Walby, *Is Citizenship Gendered?*, 28(2) *SOCIOLOGY* 379 (1994).

⁸⁰ See Kalliope Agapiou-Josephides, *Women’s Suffrage in Cyprus*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 453, at 453; and Ruth Farrugia, *Female Suffrage in Malta*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 389, at 399–400.

⁸¹ See, e.g., LES GARNER, *STEPPING STONES TO WOMEN’S LIBERTY: FEMINIST IDEAS IN THE WOMEN’S SUFFRAGE MOVEMENT, 1900–1988*, at ch. 7 (1984); BRYAN S. TURNER, *CITIZENSHIP AND CAPITALISM: THE DEBATE OVER REFORMISM* 60 (1986).

⁸² TURNER, *supra* note 81, at 269.

interpreted as an expression of the fact that a more direct causal role can be attributed to the war.⁸³

While women's participation in World War I might have been a triggering factor in some countries, it is a country's struggle for independence which appears to have been a more general galvanizing force. This of course was natural in the case of latecomers to independent statehood, such as Cyprus or Malta. But this held true more generally, and over time—not just after World War II, when such standards were most widely spread. One of the triggering factors of the early granting of suffrage to women in Finland was women's successful participation in both the nationalist struggle against Russian oppression, and the fight on the language question to defend the affirmation of Finnish instead of Swedish.⁸⁴ Similarly, in Estonia, Latvia, and Lithuania, female suffrage was, in part, related to the women's involvement in the nationalist struggle against the Russian empire.⁸⁵ Arguably, women's undeniable active contribution to such causes had to be acknowledged, representing a direct challenge to the notion that women were not apt to engage in politics. Furthermore, in some cases, the affirmation of a nationalist agenda weakened, delayed, or contaminated the political polarization around the class axis, an axis which in so many ways had the potential to overshadow the gender axis. Finally, in several countries, the causal link was not direct, but the timing made sense: since the nationalist struggle had divided the women's movement internally and discouraged political parties to prioritize suffragist claims, the overcoming of such internal division when the national question was eventually resolved simply allowed women to present a common front and political parties to prioritize the cause of women's empowerment.⁸⁶

Other hypotheses have related the achievement of female suffrage to broader conceptions of (women's) citizenship. Notably, in Scandinavian countries, there seems to be a tight connection between the early achievement of civil equality and political citizenship rights.⁸⁷ Also, it has been said that the fact that several of the countries first to grant women suffrage were mostly agrarian societies, such as Finland, Sweden, and Denmark, shows that it was the lack of separation between the home, labor, and employment (typical of an agrarian society) which made the recognition of women as sources of production more evident, thereby making the construct of the separate spheres less appealing.⁸⁸

⁸³ *Id.*

⁸⁴ See Korppi-Tommola, *supra* note 48, at 47–48.

⁸⁵ See, respectively, Helen Biin & Anneli Alby, *Suffrage and the Nation: Women's Vote in Estonia*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 111, at 113; Aija Branta, *Winning Women's Vote: Experience from Latvia*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 95, at 95, 101–102; Toma Birmontienė & Virginija Jurėnienė, *The Development of Women's Rights in Lithuania: Striving for Political Equality*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 79, at 79.

⁸⁶ The nationalist struggle played a crucial role in several European countries, including Ireland (see Hill, *supra* note 32, at 261–262, 264); Austria (see Bader-Zaar, *supra* note 21, at 193, 196–199), and the former Czechoslovakia (see Dana Musilová, *Mothers of the Nation: Women's Vote in the Czech Republic*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 207, at 209–210).

⁸⁷ LISTER ET AL., *supra* note 9, at 31.

⁸⁸ *Id.*

Drawing from Macpherson, Pateman has argued that female suffrage was granted in so many countries by the end of the war because by then the meaning of the vote had undergone a radical change: franchise had been “tamed” both through “the development of the party system and of the welfare state blunting working-class pressure for reform.”⁸⁹ In other words, women gained suffrage precisely when suffrage had lost much of its citizenship importance and transformative power in the face of the increasing recognition of social rights. Beyond the connection between social and political rights that Pateman refers to, in several European countries, female suffrage was indeed granted when suffrage mattered less altogether, including when it was relegated to a mainly symbolic role in the definition of citizenship and the state. The granting of suffrage to women under fascist and communist authoritarian regimes—that is, in regimes where elections were the façade of totalitarianism, if they took place at all—seems to be a case in point.

Granting suffrage to women under Communism resonated well with the communist regimes’ criticism of private bourgeois family for enslaving women by reducing them to the status of male property. Communist regimes generally dismissed “the woman question” as a bourgeois anachronism, as a question which had to be integrated within the wider communist agenda of social reform. They therefore often banned and/or took over women’s organizations. Community sharing of housework and child care, women joining the production line, and their participation in community affairs through the right to vote and stand for office were promised, aligning orthodox Marxism and feminism.⁹⁰ It is therefore not surprising that, as part of their rhetoric of social equality, Communist dictatorships preserved men’s and women’s suffrage rights where they existed, and even tried to ensure women’s representation through the use of quotas. In some countries, such as Bulgaria,⁹¹ Romania,⁹² and Slovenia,⁹³ the Communist regime even introduced equal universal suffrage for the first time. Of course, political rights were in these cases just an empty formality, and both the men and women occupying political positions in such regimes were at most puppets of the Communist party.

Fascism saw the role of the woman differently. Fascist regimes in Germany, Italy, Portugal, and Spain, all rested on a very traditional view of women’s social role as wives and mothers, but they also tried to portray themselves as connected to the needs and distinct contributions of both men and women within the nation. In particular, women were involved in civil society through corporatist feminine organizations, where they were expected to contribute to upholding the moral standards.

⁸⁹ See Pateman, *supra* note 1, at 342, citing CRAWFORD BROUGH MACPHERSON, *THE LIFE AND TIMES OF LIBERAL DEMOCRACY* 64–9 (1977).

⁹⁰ ZOLLINGER GIELE, *supra* note 50, at 11–12.

⁹¹ See Krassimera Dasjkalova, *Women’s Suffrage in Bulgaria*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 321, at 330.

⁹² Roxana Cheșchebec, *The Achievement of Female Suffrage in Romania*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 357, at 368.

⁹³ Irena Selišnik, *Female Suffrage in Slovenia*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, *supra* note 2, 339, at 339.

The family and the home, however, remained their natural place so much so that women's employment was at times explicitly banned. The dictators in such regimes thus granted men and women some suffrage rights as part of their populist strategy, but in all cases this remained a moot gesture that, in a dictatorship, came at no political cost.

6.2. Synergies and paradigms

Having distilled what seem to have been some of the main contributing factors, it is worth inquiring about possible sets of conditions signaling and typology of paths that either facilitated or delayed women's suffrage. Among the countries that granted women suffrage before World War II, and often before or right after World War I, we can distinguish two groups. First, there are those that followed a "joint track." Here, women's suffrage was fought for, not as a separate cause, but rather as part of the struggle for universal suffrage, understood as including both men and women, in search of a modern notion of citizenship, sometimes, but not always, linked to a campaign for independent statehood. This joint track was followed in some of the first countries granting women full suffrage, including Finland (1906), Denmark (1915), Estonia, Latvia, and Lithuania (1918), Poland (1918), the Netherlands (1919), Luxemburg (1919), and Ireland (1922).⁹⁴ Political parties seem to have been the main protagonists. Since female suffrage was not pitted against male universal suffrage, this allowed political parties, including liberals and left-wing parties, to act out of principle on this front (instead of sacrificing female suffrage on expediency grounds). This was so, even though conservative and religious forces seized the opportunity and supported universal suffrage only in exchange for support on some of their own causes. Also, the absence of pressure to "prioritize class over gender" sometimes facilitated the collaboration between women's groups and suffragists and political parties, as in Finland, where women's associations were in close collaboration with the Labor Party, within which women had a strong and autonomous organization.⁹⁵

The second group of countries that granted women suffrage relatively early (and, in any event, before World War II) is made up of those where modernization and democratization brought about male universal suffrage first, quite often, though not always, as a result of left-wing and progressive forces prioritizing on strategic grounds class over gender struggles. In these countries, three factors seem to have been particularly conducive to a relatively early access to female suffrage. First was the existence of strong women's and suffragist movements heralding the cause of women's franchise (as in the UK).⁹⁶ Second, and in relation to this, was the extent to which the groups mobilizing in favor of women's suffrage were able to overcome internal divisions over

⁹⁴ See, on Finland, Korppi-Tommola, *supra* note 48, at 48; on Denmark, Fiig & Siim, *supra* note 68, at 61; on Estonia, Biin & Alby, *supra* note 85, at 111; on Latvia, Branta, *supra* note 85, at 95; on Lithuania, Birmontienė & Jurėnienė, *supra* note 85, at 79; on Poland, Fuszara, *supra* note 32, at 143; on the Netherlands, Bleijdenbergh & Bussemaker, *supra* note 18, at 179–180; on Luxemburg, Kmec, *supra* note 29, at 160–161; and on Ireland, Hill, *supra* note 32, at 261–264.

⁹⁵ See Korppi-Tommola, *supra* note 48, at 49–50.

⁹⁶ See Cowman, *supra* note 52, at 274–280, 282–284.

key issues, including whether to prioritize the worker's struggle over the women's cause (as in Germany);⁹⁷ what position to take regarding a nationalist struggle (as in Ireland);⁹⁸ or whether to participate in World War I (as in Germany⁹⁹ and the UK¹⁰⁰). Finally, crucial was also the degree of support that the women's suffrage movement managed to garner from progressive political parties or key male political figures, a collaboration that played an essential role in many countries, including Sweden, Austria, and Czechoslovakia,¹⁰¹ and/or from conservative sectors joining their cause on strategic grounds, as in Spain.¹⁰²

By contrast, pervasive lack of political support, or even active resistance of opposing political forces; absence, weakness, or extreme division inside the women's movement; and late access to democracy and independent statehood are primarily responsible for the belated achievement of female suffrage in the rest of the countries in Europe. When the First Republic (1911–1926) was proclaimed in Portugal and the Republican Party came to power, it stopped supporting female suffrage for fear of conservatism attached to women's Catholicism, even though women had articulated much of their mobilization through Republican opposition. As a consequence, female suffrage was delayed until 1975 when the dictatorial regime of the Estado Novo 1926–1974 was finally replaced by a modern democratic regime.¹⁰³ In Italy, a lack of durable allegiances among women's associations when their primary loyalty was to political parties, and a lack of commitment to the suffrage cause from the main political parties, especially the Socialist Party, account for women's late access to suffrage in 1946.¹⁰⁴ Similarly, a pervasive lack of support from the main progressive parties and the absence of a

⁹⁷ In Germany, suffrage was achieved when the divisions between bourgeois and socialist women subsided, and socialists' ambivalence around female suffrage was overcome. See Sacksosky, *supra* note 45, at 134–135.

⁹⁸ See *supra* note 322 on Ireland.

⁹⁹ Sacksosky, *supra* note 45, at 134–135.

¹⁰⁰ Cowman, *supra* note 52, at 279–280, 287.

¹⁰¹ In Sweden, women suffragists joined forces with liberals and social democrats against the resistance of conservatives (see Wangnerud, *supra* note 17, at 248). In Austria, success came as a result of low-profile women's suffragism, which began at the end of the nineteenth century and was fuelled by international suffragism, the overcoming of class- and ethnicity-based divisions around nationalist struggles, and the support of Social Democrats who supported women's suffrage only after men had gained universal suffrage, and against the resistance of Christian Socials and German nationalists (see Bader-Zaar, *supra* note 21, at 193, 194, 196–198). Also crucial in achieving the vote for women in Czechoslovakia was the allegiance between some key male politicians and women's groups (of mostly liberal inclination), and, after the turn of the century, specifically suffragist groups, which became particularly active after men gained suffrage. See Musilová, *supra* note 86, at 214–216; and Lubica Kobová, *The Contexts of National and Gender Belonging: The History of Female Suffrage in Slovakia*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, 225, at 229–230, 234.

¹⁰² In Spain, female suffrage was achieved under the Second Republic (1931–1936), through the joining of forces of the socialists, the conservatives and regionalists which made it possible to overcome the Republican opposition by a very small margin. See Aguado, *supra* note 25, at 293–295.

¹⁰³ See Maria Lucía Amaral & Teresa Anjinho, *Winning Women's Vote*, in *THE STRUGGLE FOR FEMALE SUFFRAGE IN EUROPE*, 475, 479.

¹⁰⁴ See Mancini, *supra* note 19, at 375–378, 382. This resistance became especially acute when the Union of Catholic Women formed in 1908 to neutralize the socialist advance (*id.* at 377).

suffragist or women's movement are the main reasons for Belgium's late granting of female suffrage in 1948.¹⁰⁵ An internal split within the women's movement, late suffragism, and a lack of commitment from mainstream political parties also explain why women in Greece only gained suffrage in 1952, and only with the aid of external pressure.¹⁰⁶ Similarly, scissions within the women's movement combined with lack of support from the main political parties explain the postponement of women's suffrage in Bulgaria, Romania, Slovenia, and also Switzerland.¹⁰⁷

Finally, in other cases, the late enfranchisement of women was directly related to the fact that independent democratic statehood was itself late to come. Such a delay ensured that male and female universal suffrage would once again come together, and without the need for specific political mobilization or support, reflecting a global consensus of democratic standards. In other words, the later a country consolidated its democracy, decolonized, and achieved independent statehood, the higher the chances that it would automatically assume universal male and female suffrage to be part of the consolidated universal criteria, and the lesser the need for either political parties or women's groups fighting for it locally.¹⁰⁸ Both Malta and Cyprus are examples of late female suffrage linked to late decolonization.¹⁰⁹

7. Women's gradual achievement of citizenship: unsettling T.H. Marshall

The evidence provided by the histories behind women's access to suffrage in Europe support the views of scholars who have identified serious problems with the long-standing conventions around the modern notion of citizenship, as a container of rights. The theoretical exclusion of women from political life since the seventeenth

¹⁰⁵ Fearing women's conservative/religious vote, in an effort to unite anti-Catholic forces, liberals had agreed to support the socialist claim for universal male suffrage if the latter would let go of women's suffrage. In the end, the example of neighboring countries (above all the fact that Germany, Luxembourg, and the Netherlands had recognized female suffrage after World War I, and France after World War II), women's contribution to the war, and the strategic action of the Catholic party created the conditions for the bill that the Catholic and Communists submitted to parliament in 1948 that would enfranchise women. See Meier, *supra* note 33, at 411–412.

¹⁰⁶ See Samiou, *supra* note 53, at 442–444.

¹⁰⁷ On Bulgaria, see Dasjkalova, *supra* note 91, at 321–325, 327, 330–331; on Romania, see Čeșcebec, *supra* note 92, at 359 and on Slovenia, see Selišnik, *supra* note 93, at 339. In Switzerland, a lack of political support and fragmented women's and suffrage movements seems to have been the cause for the late granting of suffrage rights (see BANASZAK, *supra* note 27, at 203–208). Additionally, the federal nature of the country seems to have worked against it, as the cantons of Appenzell A.R. and Appenzell I.R. strongly opposed state interference (*id.* at 208–214).

¹⁰⁸ It has been noted that only three countries that became independent in the twentieth century (Austria, Ireland, and Libya) extended suffrage to men prior to women. The largest worldwide wave of countries extending the franchise to women occurred after 1930, in the wake of decolonization. After 1945, no newly independent country extended suffrage rights to men but not to women. See Ramirez et al., *supra* note 76, at 737–738.

¹⁰⁹ On Malta, see Farrugia, *supra* note 86, at 392, 396. On Cyprus, see Agapiou-Josephides, *supra* note 80, at 453, 455–456, 462.

century, on the basis that women naturally lacked the liberty and independence needed for public life, rendered womanhood a disqualification for equal citizenship. By the mid-nineteenth century, women's distinct position had become institutionalized through the denial of civil standing to wives, and the exclusion of women from the public sphere.¹¹⁰ The sexual contract had made women's work in the fields of human reproduction, care, and management of dependency within the family indispensable for the *mise-en-scène* of men's independence in the public sphere. The nuclear family had been constructed as the locus where gender relations are defined and supported, and women had been acknowledged to play a role as members of the community. To the extent that this ensured their status as citizens, it implied citizenship of a different kind from men. Instead of resting on the notion of independence, women's citizenship revolved around dependency. As such, it constituted the flip-side of men's citizenship, its opposite, and its enabling instrument at the same time.

This is clear in the connection with the different strands of citizenship, as articulated by T.H. Marshall.¹¹¹ In his seminal article "Citizenship and Social Class," Marshall divided citizenship into three parts, "dictated by history even more clearly than by logic":¹¹² civil, political, and social citizenship.¹¹³ Marshall's reading on the unfolding of the concept explained how these three strands of citizenship were articulated on the basis of civil, political, and social rights, recognized in the eighteenth, nineteenth, and twentieth centuries, respectively. Civil rights articulated the independence individuals required to interact in the private sphere. As such, their recognition preceded rights of political participation, as only independent individuals could act as independent citizens in the public sphere. Social rights then came to guarantee the conditions that make possible individuals' civil independence, and hence their political participation.

Marshall's analysis has been criticized on several accounts. Feminists, in particular, have criticized his failure to reflect how gender (and not only class) divisions structure denial of, and access to, citizenship rights.¹¹⁴ Women's access to citizenship in Europe certainly does not fit within the model developed by Marshall. Rather, women's access to citizenship is the inverted image of that model.

7.1. Women's civil disenfranchisement

In European countries, the rights that articulate civil citizenship—that is, the rights necessary for individual freedom, understood as self-possession, legal personality, and market freedoms—were the last to be recognized to women. In fact, with the main exception of the Nordic countries, women gained full suffrage rights before qualifying as independent individuals, through the recognition of equal rights with men in

¹¹⁰ Pateman, *supra* note 1, at 331–348.

¹¹¹ Thomas Humphrey Marshall, *Citizenship and Social Class* [1949], in T.H. MARSHALL *SOCIOLOGY AT THE CROSSROADS AND OTHER ESSAYS* 73–99 (1963).

¹¹² *Id.* at 73.

¹¹³ *Id.* at 74.

¹¹⁴ See Walby, *supra* note 79, at 382, 384. Criticizing Marshall for his ethnocentrism, see also Michael Mann, *Ruling Class Strategies and Citizenship*, 21 *SOCIOLOGY* 339 (1987); and Bryan S. Turner, *Outline of a Theory of Citizenship*, 24(2) *SOCIOLOGY* 189 (1990).

the private sphere—including the capacity of married women to own property and administer their personal belongings, or to live anywhere other than where their husbands insisted—and the overcoming of marital-status related employment discrimination against women. Indeed, until well into the twentieth century, European countries articulated women's relations to other individuals through their subordination to men. The decisive steps towards truly equal marriage rights were taken after 1945, and as a rule not before the 1960s and 1970s, marriage and family law being regarded as the paradigmatic domains of traditions.¹¹⁵ Also, the historical significance of married women's exclusion from rights and duties of civil law cannot be underestimated, given that, until the extension of the franchise beyond the propertied classes, it was civil rather than political rights that conferred the status of citizen.¹¹⁶

This is true of the French, Germanic, and English common law traditions, the only significant exception being, as said, that of the Nordic countries. The French Civil Code, *Code Napoleon*, generally praised as the first realization of liberal principles in private law, fully entailed the preservation of “the traits of medieval patriarchy the longest and in its purest form.”¹¹⁷ The leading rule, that “The man owes his wife protection; the wife owes the husband obedience” (art. 213Cc), meant that, although a wife could formally own property, she was under the legal guardianship of her husband. Forever a minor according to the code, she had to request her husband's authorization for a number of acts, including being a party to legal proceedings, signing contracts, setting herself up in a profession, doing financial transactions, or joining a political party or a trade union. This Code had a great impact on all countries subjected to French rule by the Napoleonic wars and left its mark even after those countries or regions had gained independence. This was true of Italy, Spain, Luxemburg, the Netherlands, and some parts of the German states. In English common law, the so-called coverture remained the dominant paradigm. Epitomized by William Blackstone's dictum in his commentary on English common law (“In law husband and wife are one person, and the husband is that person”),¹¹⁸ it meant that a married woman could not own property or make contracts without her husband's consent. Free access to both education and employment but also equal custodial rights over the children were denied to her. Enforced in 1900, with its family and marriage regulation in force until 1953 and 1957 respectively, the German Civil Code reaffirmed the husband's right to decide in “all matters affecting communal life of the couple” and also re-established paternal authority. Moreover, the husband was in principle granted the exclusive right to manage property and to intervene in his wife's labor contracts. Even in communist dictatorships, women's official equality with men was translated into equal political rights

¹¹⁵ LISTER ET AL., *supra* note 9, at 31.

¹¹⁶ Ursula Vogel, *Under Permanent Guardianship: Women's Condition Under Modern Civil Law*, in *THE POLITICAL INTERESTS OF GENDER* 135 (Kathleen B. Jones & Anna G. Jónasdóttir eds., 1988).

¹¹⁷ LISTER ET AL., *supra* note 9, at 32, citing MARIANNE WEBER, *EHEFRAU UND MUTTER IN DER RECHTSENTWICKLUNG: EINE EINFÜHRUNG* (1907).

¹¹⁸ LISTER ET AL., *supra* note 9, at 32, citing Ursula Vogel, *Fiction of Community: Property Relations in Marriage in European and American Legal Systems of the Nineteenth Century*, in *PRIVATE LAW AND SOCIAL INEQUALITY IN THE INDUSTRIAL AGE* 91 (Willibald Steinmetz ed., 2000).

(and into social rights and benefits) before full civil equality with men was actually spelled out.

Only Scandinavian countries present meaningful exceptions, exceptions which must be related to the features of their transition from agrarian to modern societies, and, in particular, the way this transition skipped the bourgeois phase.¹¹⁹ After the middle of the nineteenth century, gender-based guardianship was formally abolished for all women, married women's capacity being connected to a rather early granting of property rights to all women (1874 in Sweden, 1899 in Denmark, and 1888 in Norway). Marriage legislation reform also took place several decades sooner than in most other European countries (Sweden 1920, Denmark 1925, Norway 1927, and Finland 1929),¹²⁰ providing for equal property rights, divorce liberalization, and complete abolition of male authority, as well as equal custody of the children. It is therefore interesting to observe that Scandinavian women were among the first to get the right to vote.¹²¹

7.2. Women's social disenfranchisement

The different timing of the achievement of women's and men's citizenship rights also applies to social rights. In contrast to the sequence T.H. Marshall theorized using the example of the British male citizen, an opposite order applied to women. Women were granted social rights before gaining suffrage rights, and of course before qualifying as independent individuals in the private sphere. In the UK, women were first covered by some restrictive and disciplinary social rights under Poor Laws, and then gained some social rights as mothers in the early twentieth century.¹²² A similar sequence can be observed in most countries, again with the Nordic exception, where the welfare state developed hand in hand with family reform legislation disestablishing the breadwinner model and framing the care of children as a collective responsibility.

This general sequence explains why the social rights granted to women, preceding both political and civil equality, were not aimed at enabling women to act as independent individuals. Women's civil subordination to men was ensured and in fact, those social rights that could have worked towards women's economic independence, such as access to education and to the liberal professions, were not among the first to come to women. No surprise they became the primary target of many feminist activists¹²³ and women's organizations including the Danish Women's Society, the Belgian League for Women's Rights, the Finnish Women's Association, the Latvian *Jauņā Strāva*, the General German Women's Association, the Hungarian National Association of

¹¹⁹ LISTER ET AL., *supra* note 9, at 34.

¹²⁰ For a historical analysis of the Nordic welfare state and its connection to the family model, see also *THE NORDIC MODEL OF MARRIAGE AND THE WELFARE STATE* 27 (Kari Melby, Anu Pykkänen, Bente Rosenbeck & Christina Carlsson-Wetterberg eds., 2000).

¹²¹ LISTER ET AL., *supra* note 9, at 35.

¹²² *Id.* at 36.

¹²³ Noteworthy were Teréz Brunszvik, Blanka Teleki, and Hermin Beniczky Pálné Veres in Hungary; Anna Karima in Bulgaria; Gabrielė Petkevičaitė-Bitė in Lithuania; and Sappho Leontias, Polyxeni Loizias, and Persophone Papadopoulou in Cyprus.

Female Clerical Workers, the Polish *Enthusiasts*, the Slovak *Živena* (Donatrix of Life), the Czech Women's Clubs, and the Bulgarian Women's Union. Their efforts in this regard were sometimes countered by a conservative approach to women's education geared towards forming good mothers and wives.

With some rare exceptions, women were first and foremost granted social rights that did not aim at educating them, but at improving their living and working conditions as women and mothers. In a liberal context, these rights were therefore double-edged, having an impact on the establishment of a gender order in the emerging welfare state by reconfirming a gender-specific division of labor reflected in a "two channel welfare state"¹²⁴ or the patriarchal welfare state.¹²⁵ Indeed, as Orloff recalls, the programs of social provision established across the West in what can be called the "formative period of the welfare state"—from approximately the 1880s to the onset of World War I—were designed to reflect the breadwinner, and the family wage system, which viewed women as primary caretakers, domestic workers, and, at best, secondary wage earners.¹²⁶ So, just as the independent male householder/property owner had been the "ideal-typical citizen" in classical liberal and democratic theory, the "male-family provider, working-class hero" served as the "ideal typical citizen" in the literature on social rights.¹²⁷ This then often translated into a "two-tier" system (social insurance/social assistance).¹²⁸ The end result of the latter was to incorporate women in the welfare state indirectly, primarily on the basis of their husband's contribution rather than on their own or as independent right bearers.¹²⁹

In sum, women's social rights protected women and singled them out as unable to protect themselves at the same time. They improved women's social conditions while emphasizing their natural vulnerability, making women the recipients of public help and the likely objects of higher levels of public control. In the public sphere, similar to the private sphere, women were thus subjected to what has been called the "care/control paradigm",¹³⁰ which resulted "in the infantilization of women in citizenship terms."¹³¹

¹²⁴ Barbara J. Nelson, *The Origins of the Two-Channel Welfare State: Workmen's Compensation and Mother's Aid*, in *WOMEN, THE STATE AND WELFARE* 123 (Linda Gordon ed., 1990). The split that accounts for such a model is that between labor-market-related social-security programs targeting male recipients and family-based means-tested social-assistance schemes with primarily female recipients. LISTER ET AL., *supra* note 9, at 37.

¹²⁵ See Ann Shola Orloff, *Gender and the Social Rights of Citizenship: The Comparative Analysis of Gender Relations and Welfare States*, 58 *AM. SOC. REV.* 303 (1993); ELIZABETH WILSON, *WOMEN AND THE WELFARE STATE* (1977); MIMI ABRAMOVITZ, *REGULATING THE LIVES OF WOMEN: SOCIAL WELFARE POLICY FROM COLONIAL TIMES TO THE PRESENT* (1988).

¹²⁶ See Orloff, *supra* note 125, at 323.

¹²⁷ *Id.* at 308, citing Walter Korpi, *Power, Politics, and State Autonomy in the Development of Social Citizenship: Social Rights during Sickness in eighteen OECD Countries since 1930*, 54 *AM. SOC. REV.* 309 (1989) 309–28; and GÖSTA ESPING-ANDERSEN, *THE THREE WORLDS OF WELFARE CAPITALISM* (1990); and THOMAS HUMPHREY MARSHALL, *CITIZENSHIP AND SOCIAL CLASS AND OTHER ESSAYS* (1950).

¹²⁸ Whereas social assistance programs were designed to serve a predominantly female clientele (such as welfare or aid to family with dependent children, which are politically less legitimate, less well funded, and more oriented towards monitoring clients' behavior and income), contributory social insurance targeted a predominantly male clientele (such as unemployment and retirement benefits). Orloff, *supra* note 125, at 315.

¹²⁹ *Id.*

¹³⁰ Suad Joseph, *The Kin Contract and Citizenship in the Middle-East*, in *WOMEN AND CITIZENSHIP*, *supra* note 61, 149, at 159.

¹³¹ *Id.*

That is, women were conceptualized as recipients of protection more than as empowered citizens, or as “passive” citizens. The irony, of course, was that in many countries women’s social citizenship came then to be seen as epitomizing women’s dependence, and subsequently used as an argument to resist female suffrage, since independence had always been the central criterion associated with citizenship and men.

8. From the franchise to parity democracy: a change of paradigm?

In no single country did access to suffrage translate into women gaining equal political representation with men. If we take the countries forming the European Union, even nowadays women’s representation in the lower house of their national parliament is higher than 40 percent only in two of them: Sweden (45 percent) and Finland (43 percent). In several other countries (including Cyprus (11 percent), Hungary (9 percent), Ireland (15 percent), Romania (13 percent), and Malta (9 percent)), women’s representation remains close to or below 15 percent. Countries in which women’s representation is around 20 percent include Slovakia (19 percent), Bulgaria (23 percent), the Czech Republic (22 percent), Estonia (21 percent), Poland (24 percent), Greece (21 percent), Latvia (23 percent), Lithuania (25 percent), Italy (21 percent), Luxemburg (22 percent), and the UK (23 percent), whereas in France (27 percent), Austria (28 percent), Switzerland (29 percent), Germany (33 percent), Slovenia (32 percent), and Portugal (29 percent), the representation is around 30 percent. Closer to 40 percent representation come only the Netherlands (39 percent), Belgium (38 percent), Denmark (39 percent), and Spain (36 percent).¹³²

It is interesting to notice that many of the countries with a higher number of women representatives today are among those where women gained suffrage at an earlier stage, including Finland, Sweden, the Netherlands, and Denmark. This correlation does not always stand, however. While Belgium only recognized female suffrage after World War II, today it has a comparatively high number of female representatives. In Luxembourg and the UK, on the other hand, women representatives stand at around 20 percent, despite both being among the pioneers in enfranchising women. Among the many variables which explain such variations are, just to mention a few, the electoral system (proportional systems are known to favor the representation of women over majority-based systems); the size of electoral districts (larger districts are known to be more favorable to women’s representation); and whether or not gender quotas have been adopted, either internally by all or some political parties or legislatively imposed.

A striking, and consistent, pattern is that in no European country women have achieved parity, understood as a representation that comes close to 50 percent. In most of them, maybe with the exception of some of those who were real latecomers, it

¹³² This data, pertaining to 2012, comes from the Interparliamentary Union’s webpage, <http://www.ipu.org/wmn-e/classif.htm>.

took women several decades after they gained suffrage for women to become political representatives in numbers that could be described as more than token or symbolic. Thus, it took approximately sixty years after women's enfranchisement for Denmark and Sweden to cross the 20 percent threshold of women in parliamentary seats, and seventy years to reach the 30 percent mark.¹³³ And in Finland, the country that came first in our sample, granting women suffrage as early as in 1906, until the 1970s women's representation remained under 22 percent, increasing in the period from 1970 to 1990 to 31 percent, and surpassing the 30 percent threshold only in 2007 to reach 41 percent today.

Thus, although universal suffrage was envisaged as the means to transit to a democratic state encompassing both men and women, female suffrage failed to question the sexual contract as a foundational myth of the state, and this remained, as a result, markedly masculine.¹³⁴ The effects of women's political rights were mitigated by women's belated civil citizenship and the gender bias of women's social citizenship,¹³⁵ all of which was supported by the cultural and economic reinforcement of the nuclear family and breadwinner model in the post-World War II years.¹³⁶ This reinforced the public realm as the territory of men and the private sphere as the domain of women, and consecrated the endemic majority participation of men in public affairs, employment, and politics, in a public arena built upon the foundations of the ideal of male independence.¹³⁷

In fact, one of the most fascinating stories in the history of women's citizenship in Europe is how the transition from former communist regimes to democratic liberalism was accompanied by an initial phase of "allergy to feminism," a rejection of a gender-neutral, homogenizing conception of equality and citizenship, and the assertion of the role of the "occupational housewife," which had not existed during Communism.¹³⁸ Transition to modern democracy was interpreted as validating the separate spheres tradition, arriving hand in hand with a decrease in the proportion of women in the public arena in many countries of the former Soviet bloc, including Hungary,¹³⁹ Estonia,¹⁴⁰ Poland,¹⁴¹ Slovakia,¹⁴² and Romania.¹⁴³ Only now, in connection to EU accession, with the consequent introduction of a European gender anti-discrimination framework and equal opportunities policies, is the notion of gender equality experiencing a re-legitimization.

¹³³ See WOMEN, QUOTAS AND POLITICS (Drude Dahlerup ed., 2006).

¹³⁴ See Blanca Rodríguez-Ruiz & Ruth Rubio-Marín, *The Gender of Representation: On Democracy, Equality and Parity*, 6(2) INT'L J. CONST. L. 287, 306 (2008).

¹³⁵ *Id.* at 309.

¹³⁶ For a critique of this family model, see Nancy Fraser, *After the Family Wage*, in NANCY FRASER, JUSTICE INTERRUPTS: CRITICAL REFLECTIONS ON THE POST-SOCIALIST CONDITION 41 (1996).

¹³⁷ Rodríguez-Ruiz & Rubio-Marín, *supra* note 134, at 309.

¹³⁸ Biin & Alby, *supra* note 85, at 123; Kovacs, *cited in* Ann Snitow, *Cautionary Tales*, in WOMEN AND CITIZENSHIP IN CENTRAL AND EASTERN EUROPE 287 (Jasmina Lukić, Joanna Regulska, and Darja Završek eds., 2006) 288.

¹³⁹ See Kollonay-Lehoczy, *supra* note 20, at 436.

¹⁴⁰ See Biin & Alby, *supra* note 85, at 122.

¹⁴¹ See Fuszara, *supra* note 32, at 156–157.

¹⁴² See Kobová, *supra* note 101, at 237.

¹⁴³ See Cheschebec, *supra* note 92, at 370–371.

Of course, much has changed since women first achieved suffrage and since the post-World War II years celebrating “the angel in the home” model. In most European countries today, many more women take an active role in politics and the labor market than in the immediate aftermath of enfranchisement. In every country, legislative reform has been undertaken to gradually ensure women’s equal citizenship. Yet, when explaining the gender gap in political representation, and, more generally, the ways in which equal franchise has not delivered equal citizenship, one must take into account the persistence of facts such as the unequal distribution of domestic work and unpaid care labor; the gender pay gap; women’s segregation and precariousness in the employment market (where they have a greater share of the less-qualified and often part-time positions); lack of child-care and insufficient parental leave; gender bias in social security schemes still entrenching the breadwinner model; and the lack of leadership positions in the private sector, media, and academia, including in business managerial positions. All of these are signs of the legacy of a sexual contract which has not yet been sufficiently disestablished, a legacy revealing that the public sphere continues to be male dominated, and that, to the extent that women have entered the public domain, this has not been accompanied by a parallel shift of men to the private sphere.¹⁴⁴

In view of all this, we can only celebrate that, at least since the mid-1980s, there has been an active agenda of European dimension to expand the idea of equality between men and women, to finish the task of ensuring women’s full citizenship by removing the remnants of the sexual contract. Whereas European policies were initially limited to non-discrimination and equal opportunities in the employment domain, there has been a gradual expansion of what equality between men and women means. Gender equality has started to be regarded as a democratic necessity that encompasses women’s empowerment in both the public and private domestic domains.¹⁴⁵ The Council Recommendation on the balanced participation of women and men in decision-making, adopted following the Council’s resolution of March 1996, started to epitomize a view which has since only gained more of a foothold.¹⁴⁶

This evolution at the level of the European Union has followed a concern with the balanced participation of women and men in political and public decision-making, expressed since the mid-1980s by the Council of Europe. In 1997 the Declaration on Equality between women and men as a fundamental criterion of democracy was adopted during the 4th European Ministerial Conference on Equality between Women and Men, in Istanbul, becoming a reference for all those working to increase the participation of women in decision-making. The Declaration argues that “the marginalization of women in public life and democracy [is] a structural factor . . . linked to the unequal distribution of economic and political power between women and men and

¹⁴⁴ See FIONA MACKAY, *LOVE AND POLITICS: WOMEN POLITICIANS AND THE ETHICS OF CARE* 83 (2001).

¹⁴⁵ See Agnès Hubert, *From Equal Pay to Parity Democracy: The Rocky Ride of Women’s Policy in the European Union*, in HAS LIBERALISM FAILED WOMEN?, *supra* note 14, 143, at 148. Rubio Marin, *supra* note 3, at 104–107.

¹⁴⁶ See *A Strengthened Commitment to Equality between Women and Men. A Women’s Charter*, Communication from the Commission (Mar. 5, 2010), Doc. no. COM(2010)78 final.

to attitudinal stereotypes regarding the social roles of women and men,” preventing both from realizing their potential. In view of this, equality required a “dynamic challenge to the established power structures and to stereotyped sex roles so as to achieve structural change” and a “new social order.” Part of this change required “greater participation by men in the sphere of private life, in caring responsibilities,” and a “more equal sharing of responsibilities for decision-making in political and professional life with women,” something which would arguably “improve the quality of life for all.”

At a national level, there have also been signs of progress. Over the last two decades, the idea of relying on some form of quota to ensure women’s access to political office has increasingly been accepted in several European countries. In France, Belgium, Slovenia, Spain, and Portugal, the law imposes some form of gender quota in electing representatives for political office.¹⁴⁷ In many other countries, such as Norway, Sweden, Germany, Poland, and the United Kingdom, some of the political parties have adopted gender quotas for electoral candidates voluntarily.

More recently, there has also been a growing awareness that parity democracy can only be affirmed if women are incorporated not only into politics, but also into all the other spheres of public and private power, something which must therefore include the world of the corporate elite. Many European countries, such as Finland, Sweden, Poland, the Netherlands, Denmark, and Switzerland, are approaching the problem of women’s under-representation in corporate boards of public limited companies through soft measures, including corporate governance codes and charters that companies can sign voluntarily.¹⁴⁸ But increasingly, gender quotas set by legislation are being considered as well. In 2003, Norway became the first country in the world to pass a law requiring all public companies to achieve gender balance on corporate boards (at least 40 percent of each sex),¹⁴⁹ a measure it extended in 2006 to public limited companies. In Spain, in 2007, a law introducing gender parity for electoral office also enshrined the goal of gender parity on corporate boards as a goal to be achieved by 2015. In Iceland, legislation adopted in 2010 applicable to publicly owned and publicly limited companies with more than 50 employees aims to ensure that each sex will make up at least 40 percent of boards by 2013. Even more recently, in 2011, similar quota legislation for state and public companies has also been approved in France, Belgium, and Italy.¹⁵⁰

The unequal distribution of public and private power between women and men has thus become a key issue in European democracies, resulting in new approaches to

¹⁴⁷ See European Parliament Directorate-General for Internal Policies, Policy Department C, *Electoral Gender Quota Systems and Their Implementation in Europe* (2008), at 11.

¹⁴⁸ See Julie C. Suk, *Gender Parity and State Legitimacy: From Public Office to Corporate Boards*, 10(2) INT’L J. CONST. L. 449, 449 (2012); Darren Rosenblum, *Feminizing Capital: A Corporate Imperative*, 6 BERKELEY BUS. L. J. 55 (2009).

¹⁴⁹ Countries setting gender quotas for state-owned companies also include Denmark, Finland, and Iceland from early 2000.

¹⁵⁰ For a summary, see Publications Office of the European Union, *Report on Progress on Equality between Women and Men in 2010. The Gender Balance in Business Leadership* (2011).

advance gender equity and to re-conceptualize citizenship rights. Reflecting on the forces that led to female suffrage now seems relevant at a time when the construction of a European citizenship stands as an open political project. This project inevitably draws on existing notions of citizenship, but at the same time has an enormous potential to redefine these very notions. Exploring the role that female suffrage has played in the construction of female citizenship, and of the place female suffrage and citizenship occupy in working notions of citizenship, is important at this junction.