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Comparing Denmark, Britain and France

Siim, Birte

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TOWARDS A GENDER SENSITIVE FRAMEWORK FOR
CITIZENSHIP

COMPARING DENMARK, BRITAIN AND FRANCE

BY
BIRTE SIIM

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Phone.: +45 96 35 84 32, fax: +45 98 15 32 98, e-mail: joan@i4.auc.dk

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Towards a Gender Sensitive Framework for Citizenship

Comparing Denmark, Britain and France¹

Birte Siim

Introduction

The problems of citizenship connected with unemployment, marginalisation and poverty have, during the last 20 years, been rediscovered in the modern European welfare states. This development has been followed by a political debate about what are and what ought to be the rights and duties of citizens, and about who are included in and who are excluded from the solidarity of society. The present transition of European welfare states poses new challenges to the understanding of citizenship connected with globalization, the transformation of the nation states and immigration, as well as with the increasing cultural diversity and new demands for social rights, equality and self-determination from women and from marginalised groups.

The concept of citizenship dates back to the classical principles of individual self-determination, equality and solidarity from the French revolution. The modern understanding of citizenship has been inspired by T.H. Marshall's analysis of the evolution of civil, political and social rights in modern societies. The universal model of citizenship did not include women, and there was no evolution à la Marshall's from civil, to political to social rights for women. The classical political philosophies excluded women from full citizenship in the economy and in the state, and feminist scholars have argued that women have been second-class citizens, because the welfare states have been based on a division between wage work and motherhood (Pateman 1991). Today, women have become wage workers and increasingly participate in politics, but they still have not gained a full and equal access to citizenship (Sarvasy and Siim 1994).

The classical questions of citizenship were connected with social class, while the new questions of citizenship are related to gender, ethnicity and race. Today citizenship has been transformed. From a gender perspective, I suggest that there are two tendencies that are important for the understanding of citizenship in the modern welfare states: a) the move from a male breadwinner to a dual-breadwinner model, and b) the increase in women's participation, organization, and representation in politics. These changes have implications for developing a gender sensitive framework for citizenship. They express a shift in the discourse of gender that challenge the dominant discourses of citizenship in European welfare state, and they give women new political potentials and pose new problems for women, and for society.

The objective of this paper is double: to develop the theory of citizenship from the perspective of gender, and to explore some of the implications for comparative studies of citizenship. The argument is that developing a gender-sensitive framework for citizenship means rethinking the relation between the two aspects of citizenship, social welfare and political citizenship. This means combining two different approaches to citizenship: The sociological tradition that has emphasised *social* citizenship, and the political science tradition that have emphasised *democratic* citizenship. The new gender-sensitive framework is used to compare the different discourses² of citizenship in Denmark, Britain and France. The main questions of the paper are: How is the meaning of key concepts of citizenship, like the public and private arena and active and passive conceptions of citizenship, transformed from the perspective of gender? What has been the relation between welfare and political agency? And what are the implications of the present changes in women's social and political citizenship for gender relations and for the discourses of citizenship in European welfare states in transition?

Engendering Theories of Citizenship

The British sociologist T.H. Marshall has been an inspiration for critical scholars, because he has a broad approach to citizenship that includes the civil, the political as well as the social aspect. Marshall has developed the framework for citizenship on the basis of the integration of the English working class in modern society analysing the evolution of rights in British society from the eighteenth to the twentieth century. He differentiated between a *civil* element that includes an individual right to freedom, for example the right of speech; a *political* element that includes the right to self-determination and to participate in the exercise of political power; and a *social* element that includes the right to a guaranteed minimum of social and economic welfare (Marshall, 1992; 18). During the twentieth century the main idea is the expansion of the principle

of *universal* rights, that is, all citizens' equal right to the same benefit. His conclusion of the analysis of the British society was that universal social rights in relation to *education* and *health care* were the most important means of integration of the working class into society during the twentieth century. The question is to what extent this model is still useful for understanding exclusion and inclusion of women and other oppressed groups.

Marshall developed a vision about a just society based on all citizens' equal participation in social and political communities where social inequalities connected to class were not passed on from one generation to the other. One of the strengths of his framework is the emphasis on the interconnection between capitalism, the modern welfare state and the development of a system of civil, political, and social rights of citizens. His main emphasis is on *rights* (and duties) of citizens, but he is keenly aware of the importance of the common culture and common experiences as an expression of the citizen's membership in a political community. His model has been employed as a critical measure for an evaluation of to what extent modern democracies live up to their ideas about freedom and equality, and feminist scholars are today discussing what we can learn from this model and to what extent it is still useful for understanding women's citizenship.

Marshall's model has been an inspiration for the reinvention of the framework of citizenship among sociologists, political scientists and feminists. Sociologists have used the framework of citizenship as an approach for analysing the institutionalization of *rights* (Turner 1992), whereas political scientists have emphasised the *participatory* aspect and the need to integrate new groups not only because of their socio-economic status but also because of their socio-cultural 'difference' (Young 1990). The classical idea about universalism has been challenged by postmodernism as well as by feminists. Some have suggested an alternative vision of a "sexually differentiated citizenship" (Pateman 1988, 1989) while others have formulated a vision of a "pluralist and differentiated" citizenship (Mouffe 1992, Phillips 1993).

Marshall's framework has been criticized for its optimistic perception of social evolution that presumes that the integration of the working classes is a more or less automatic and irreversible process that will gradually lead to freedom and equality for all citizens. It has also been criticized for its *anglo- and ethnocentrism* that tends to generalize from the dynamic development of the British society to all countries. Marshall's model cannot be generalized to other industrialized countries, and it can certainly not be used uncritically as a model for the development of third world countries (Turner 1992).

From a feminist perspective, Marshall's model of citizenship has been criticized for being *androcentric*, because his framework was built on an underlying *male norm*: the citizen was a

man, and wage-work was implicitly the basis for citizen rights. Feminist scholars have shown that the welfare systems have all been based upon gendered principles of division between wage work and unpaid caring work with men as breadwinners and women as economically dependent. Jane Lewis and Ilona Ostner have discussed the categorisation of European welfare regimes from the perspective of gender division of work, and the argument is that the norm about a male breadwinner that "in its ideal form prescribes breadwinning for men and homemaking/caring for women" has been a crucial principle in all welfare states that has only recently been challenged (Lewis and Ostner 1994; 17-19).

There is no doubt that Marshall's model was based on the development of the rights of *men* and thus failed to notice that the development of women's rights has had its own history and logic. In many countries women gained social rights before they got the right to vote, and before they got civil rights in marriage. And furthermore rights often have a different meaning for women than for men, like the fight for contraception, abortion and child care institutions, because men and women have different lives and bodies (Pateman 1992). One reason is that Marshall's framework is based on the interplay between the market and the state, and does not incorporate the interplay between state, family, and civil society, or indeed the gendered division of family life. Thus integrating the social position of women in the framework of citizenship poses new questions about the interconnection of market, civil society, family and the state.

Lewis and Ostner have analysed the male breadwinner as norm and reality in the development of European social policies, and they differentiate between *strong*, *medium*, and *weak* breadwinner states (Lewis & Ostner 1994; 17-19). The idea is that the strength or weakness of the male breadwinner model "serves as a predictor of the way in which women are treated in social security systems; the level of social service provisions, particularly in regard to child care; and the nature of married women's participation in the labour market" (Lewis & Ostner; p 19) The model is useful, because it pinpoints a missing factor in Marshall's model, that is, women's relation to wage work. It is attractive, because of its ability to explain women's second rate citizenship by focusing on one underlying logic - the male breadwinner norm.

The problem with this framework is that it tends to reduce both the development of social policies and women's wage work to one *universal* logic. One question is what determines this logic. Another question is the relation between the civil, political and social aspects of citizenship. I have suggested that social and political citizenship are two different dimensions of citizenship that are not determined by the same logic, and that political agency is a key aspect of citizenship (Siim 1994). There is no doubt that women's wage work has been closely connected with their social rights, but I suggest that women's role in the development of the welfare state

and their political presence and power cannot be deduced from the strength or weakness of the male breadwinner model. In some countries, like France, women have high activity rates on the labour market and a low representation in politics. While in other countries women have a relatively high representation in politics, like in Norway in the 1970s (and the Netherlands in the 1990s), that is combined with a relative low activity rate for married women on the labour market (Leira 1992). The term male breadwinner model thus does not fully encapsulate the complex relation between women's welfare and political agency. The advantage with the framework of citizenship is that it makes visible that the social and political dimensions of exclusion and inclusion have different histories and different logics. Contextualising the framework of citizenship is crucial for analysing the driving forces behind the development of women's social and political rights.

Many feminist scholars have been inspired by the framework of citizenship, but the concept of citizenship has been contested in feminist theory. During the 1980s there was a division between feminists advocating "an ethics of right" and others advocating "an ethics of care", between feminists stressing "empowerment from below" and "state feminists" stressing the need for women to influence political institutions "from above". Today there is a tendency to move toward a new synthesis of rights and care³, and toward a new conception of power that incorporates empowering 'from below' and integration 'from above' (Lister 1995, Young 1990, Philips 1995). There is, however, a need to more comprehensive analyses of the dynamic between social rights/welfare and political presence/power. I suggest that there is no universal logic connected with the development of social and political rights, and that there is a relative autonomy of politics that influenced women's citizenship. This means that the question about women's social and political citizenship needs to be discussed from a specific historical context. The argument of the paper is that a gender-sensitive framework of citizenship must conceptualize two relatively independent dimensions, that is a) women's social welfare rights, and b) women's political presence, identity and power, as well as the relations between them.

The Inclusion of Gender in a Comparative Framework for Citizenship

The universal model of citizenship has been criticized because it has historically been connected with the building of the European nation states. Recent attempts to transcend the ethnocentric- and androcentric framework of citizenship have come both from comparative reflections upon the national variations in the formation, development and meaning of citizenship (Turner, 1992),

and from reflections of the specific dynamic of the fights of women and ethnic groups to obtain civil, political and social rights (Yuval-Davis 1996).

The Australian sociologist Brian Turner has introduced a framework for comparative research of citizenship based the different national histories of citizenship (Turner 1992). The model has two dimensions that describe the interplay between citizens and political institutions, and the interplay between public and private arena:

1. The *active/passive* dimension that expresses how the rights of citizens were historically institutionalized in modern democracies, for example “from below” through revolutionary movements against the Absolutist State, or “from above” through the active support by the State, and
2. The *public/private dimension* that expresses whether the key to citizenship is connected with the public or the private sphere, with public or private virtues.

Turner has constructed his model from the different histories of citizenship in Europe using the German case that combines an emphasis on the private arena (i.e. the family and religion) with a view of the state as the only source of public authority, as a point of departure. On this basis he develops a typology with four different models: a) the passive German model with emphasis on *private* virtues is contrasted with b) the passive British model where rights were handed down from above by the constitutional settlement of 1688 that at the same time created British citizens as legal personalities, c) the active revolutionary American model with the focus on *private* virtues, and d) the active revolutionary French model with an emphasis on the *public* virtues of citizenship. The objective of his typology is twofold:

“The point of this historical sketch has been partly to provide a critique of the monolithic and unified conception of citizenship in Marshall and partly to offer a sociological model of citizenship along two axes, namely public and private definitions of moral activity in terms the creation of a public space of political activity, and active and passive forms of citizenship in terms of whether the citizen is conceptualized merely as a subject of and absolute authority or as an active political agent.” (Turner 1992; 55)

Turner argues that the structural relationship between the private and the public, and their cultural meanings, is an essential component in any understanding of the relationship between totalitarianism and democracy. I find the strength of Turner’s framework is the combination of a historical and comparative perspective that integrates the structural aspect with the political aspect of the critical period of nation formation. It is a preliminary model, and it needs to be developed further through case studies of the interconnection of actors and political institutions

in different national configurations. It has the potential to transcend neo-institutionalism, because it focuses on the interrelation between civil society, social movements and the political institutions. It is an inspiration to think about national variations in the meanings of citizenship as well as in their different institutionalization from a gender perspective.

Turner does not observe that the structural relation between the private and the public, as well as their meaning, are essential components of the understanding of gender differences in modern democracies (Pateman 1988). Walby has noticed that there is a difficulty in Turner's understanding of the *private* arena which in the model has two different meanings: a) individual autonomy in the family and b) freedom from state intervention (Walby 1994). One problem is that the liberal model of individual autonomy did not apply to women. During the 18. and 19. centuries, married women had no autonomy in the family, where they were both in theory and in practice subordinated as dependent wives (Pateman 1988). The feminist point is that the "private" arena has both in practice and in theory been a contradictory term, and that power relations operate both in the family, as well as in the social relations of the market and civil society (Walby 1994). It follows that the different perceptions of the private, as well as the public arena in political philosophy, and the construction of the border between the public and private arena, have gendered implications (Lister 1995). The private sphere is often contradictory for women, because it is both a site of caring and mothering and a site of oppression and dependency. Women were never considered autonomous individuals, and from a gender perspective there is a need for state regulation of families with the objective to transform both the private sphere of the family, civil society, and the market (Yuval-Davis 1996). In terms of the family, feminist scholars have argued for the need to expand the caring dimension of the welfare state, either by expanding public responsibilities for caring for children and the elderly, or by acknowledging women's caring work as part of citizenship (Knijn & Kremer 1995).

The gendered perception of the *private* arena is one problem for Turner's model. The other problem is the historical exclusion of women, and minority groups, from an active, public citizenship. The *active/passive* dimension tends to be gendered, because the public/private divide was at the same time a construction of the separation between 'private' women and 'public' men (Pateman 1988). History shows that even in the active, republican model of citizenship, like France in 1789, where women participated in the revolutionary movement, they were denied the right to speak in public, to form political meetings, and to vote (Landes 1988). In terms of politics, the feminist hypothesis is that the inclusion of women in the public sphere will both in theory and in practice transform citizenship, and feminists have developed strategies to empower women in social and political communities in civil society, as well as strategies to improve women's political presence in the public arena (Young 1990, Philips 1995).

To sum up, from a gender perspective, it is crucial to analyse the structural relations between the public and private arena as well as different meanings of key concepts like state, civil society, and the family. Another crucial question is to analyse women's political agency that includes women's political participation, presence and power in political communities, organizations, and institutions. In the following Turner's framework will be used as an inspiration for a brief comparison of the discourses of citizenship in Denmark, France, and Britain. First we compare the different perceptions of the family, civil society and the public arena, as well as differences in the political participation, influence, and power of women and men in politics. We ask what have been the relation between welfare provisions and women's political agency. Secondly, we discuss the implications of the change from the 'male' breadwinner to the 'dual' breadwinner model and the increase in women's political participation for the discourses of citizenship and for the transition of European welfare states.

The Discourse of Citizenship in Denmark, France and Britain

I find the comparison between Denmark, Britain, and France interesting, because the three countries in many ways represent different systems and discourses of welfare, citizenship, and gender: From a perspective of political citizenship, they to some extent represent an active Republican, a passive Liberal as well as a mixed Social-Democratic model, and in terms of the public/private divide they represent different visions, histories, and structures. From a perspective of social policy, they have respectively been influenced by different discourses of Social-Democracy, Liberalism and Republicanism. And finally from a feminist perspective, it has been argued that the three welfare states represent a weak, medium and strong breadwinner model (Lewis and Ostner 1994). In the following I look at the perception of gender in the discourse on citizenship in Denmark, Britain, and France focusing on the interplay between women's welfare and women's agency and on the implications of the shifts in the discourse of gender and citizenship.

Gender and Citizenship in Denmark

In the Danish discourse I suggest that there is a paradox connected with the concept of citizenship. There is a strong tradition of social rights and political participation in Denmark which has not explicitly been phrased in the language of citizenship: In terms of *social* citizenship, there has until recently been a strong political consensus about *universal* social

rights, i.e. the equal rights of all citizens to welfare independent of income, which has permeated both the political culture and political institutions. In terms of political citizenship, there has been a *participatory* tradition of involving ordinary citizens in politics that goes back to the political and cultural self-organization of the farmers in the 19. century and to the ideas of the workers movement in the 20. century. The political institutions and organizations of Social Democracy have, however also been influenced by a paternalist vision aimed at regulating society and the lives of citizens 'from above' (Finneman 1985).

The Social-Democratic Danish, and indeed Scandinavian, meaning, formation and development of citizenship does not fit into existing models, and it has been described as a mix of Continental and Anglo-Saxon traditions (Kåre Nielsen 1991;81). Firstly, Danish democracy was formed peacefully from "above". Like in Britain, citizens' rights were introduced gradually by the Monarchy during the 18. and 19. century, and democracy was granted by the King in 1849, and not like in France through a violent revolution. During the latest 100 years, both the meaning and practice of citizenship has been characterized as an *active* rather than a passive model (Hernes 1987). Secondly, Denmark has a pragmatic perception of the public arena that gives priority neither to the public nor to the private virtues. The state is perceived as a tool to solve social problems and this pragmatic perception rests on a balance between citizens and the state, between the public and private sphere (Kåre Nielsen 1991). Thus the Danish vision of citizenship combines the principle of democratic self-organization with public solutions.

In terms of *political* citizenship, ideals and norms of self-organization, participation and representation of social classes have been key aspects of the political culture with roots in both the Radical, the Liberal, and the Social Democratic Party. One implication of the vision of citizenship 'from below' has been the emphasis on *communities* (the Danish/Swedish word is close to the German notion of *Gemeinschaft*) - the horizontal aspects of citizenship, i.e. the activities and responsibilities of citizens toward their fellow citizens- which has been seen as an important *aspect* of citizenship. The relatively strong communitarian tradition of *self-organization* in Denmark was connected with the agrarian economy and the economic organization and cultural emancipation of the farmers in the 19. century, as well as to the social movement of the workers in the 20. century. Another implication is a relatively high degree of *pluralism* and *cooperation* in political life based on the fact that since the 1930s the political culture has been built on a consensus between the economic and political organizations of farmers and workers.

It has been suggested that there is a split in the Danish political culture between the strong sense of autonomy of citizens in civil society and their perception of the state as the medium for

the public good (Kåre Nielsen 1992; 80). Since the 1930s, the political development of the Danish welfare state has been marked by a high degree of institutionalization and incorporation of economic class organizations, and indeed all interest groups. The implications have been that centralized, and male dominated, economic and political organizations have played the main role in the political development. This made it possible for the Social Democratic Party to combine a paternalist perception of women as the objects of social policies, with ideals about social equality, workers' participation and equal worth of women and men (Hernes 1987). The relative homogeneous Danish state was finally based on a high degree of *unity* between state and society that has, in practice, made it difficult to integrate ethnic and religious minorities, like for example immigrants and political refugee groups (Østergård 1991).

In terms of *social* citizenship, Denmark has since 1960 been characterized by a high degree of universalism in health, education and social policy, and both social services and benefits have been directed toward all citizens independent of income. During the last 30 years, there has been a gradual transformation to a service economy with a large public sector, financed by taxes, and a parallel integration of women as the majority of wage workers in the public sector. The welfare state and the public sector have been key concepts in the political discourses from the beginning of the 1960s (Schmied 1995), and women's position on the labour market has been at the centre of this debate.

Shifts in Gender Relations

From the perspective of gender, the meaning and practice of citizenship in Denmark has changed dramatically as women have increased their participation on the labour market and in politics. Denmark, and the other Scandinavian welfare states, have been characterized as weak male breadwinner models (Lewis & Ostner 1994; 17-19), or potentially women-friendly states, that have given women opportunities to provide for themselves through wage work with support from a large public service sector (Hernes 1987, Siim 1988).

During the latest 25 years, the basic unit in social legislation has been the *individual*, not the household or the family, and there has been a change to a dual breadwinner model which implies that all individuals, women or men, have a duty to provide for themselves through wage work. At the same time public policies have helped families to reconcile working and family life, for example through child care centres and child/family benefits. There has been a growing interplay between everyday life and politics and a large political consensus about the increased public responsibility for provision of social services, including child care. The implications for women

have been double: Women have, on the one hand, gained economic and social rights as wage workers and mothers. On the other hand, women experience new *time* problems in their daily lives reconciling wage work and caring, and new problems with unemployment. The *time* problem have been especially acute for lone mothers and for working mothers, and unskilled women generally have higher unemployment rates than unskilled men (Siim 1997a).

One important change is related to the practice and meaning of motherhood, another to the meaning of politics. During the latest 25 years, there has been a parallel change in women's role in public, political life where they have increased their presence in political institutions, although there is no equality in political power between women and men. Research has shown that motherhood is no longer a barrier for women's political participation, instead motherhood, and indeed parenthood, has become a potential for citizenship (Siim 1994). Parents have become active as citizens in relation to schools and child care institutions, and the adoption of leave schemes in relation to child care (from 1993) can be seen as a recognition of the growing problems for parents combining work and care. Women make up the large majority of the parents on parental leave and this has recently been criticised as a barrier for women's equality on the labour market (Siim 1997b).

Feminists have agreed that the universalist welfare state has been beneficial for women, because it has helped change the meaning and practice of care work and of motherhood. Feminist historians have noticed that the split between the private and the public sector has not been as acute in Denmark as in countries with a strong bourgeoisie. Feminists have shown that there was a unique alliance between women in the trade union movement and women in the Women's Rights Organization (Dansk Kvindesamfund) that not only helped prevent the attempts to adopt a legal ban against married women's wage work, but indeed to explain why protective legislation in the form of night work prohibition for adult women was never adopted in Denmark (Rosenbeck 1989, Ravn 1995).

It is more difficult to explain the change in women's political roles. It can be argued that the political cultural values of 'democracy from below' have created a space for women's social and political activities that has made it easier for organized women to gain access to the public arena. It is interesting that until the mid 1980s feminist scholars, generally interpreted corporatism as the main barrier for women's political representation (Hernes 1987), and some scholars still argue that the sex segregated labour market and trade union movement are the main barriers for gender equality (Hirdman 1990). However, since the introduction of the equality law in public committees and commissions in 1986, it can be argued that corporatism has also become a means for the integration of women in politics (Bergquist 1994, Borchorst 1997).

The conclusion is that in Denmark there has been a complicated relation between women's welfare and political agency. There is no doubt that women were the objects of social policy long before they became the subjects in the political process. In that sense, welfare seems to have been the *cause* rather than the *effect* of political agency. Access to political citizenship represents potential power. From the Danish political context, one of the crucial questions is whether women have the ability and the will to transform the political agenda as feminists hope, or whether political institutions will change women? Another question is, what are the implications of the growing gender division of work with men employed in the private sector and women employed in the public sector? Will there be a growing conflict in political values between privately employed men and publicly employed women, or will the political cultural values of men and women continue to converge?⁴

Gender and Citizenship in Britain

Britain is an example of a *passive* democracy where there is an emphasis on the freedom of the individual from the oppression of the state that has at the same time been interpreted as an emphasis on the freedom of the family from state intervention. The liberal tradition has given high priority to individual rights, and civil and political rights have traditionally had priority over social rights in Britain. Women obtained relatively early civil and political rights in Britain, compared to countries like France (Sineau 1992). The passive conception of citizenship and the lack of political will to use the central state as a means to combat social inequalities as well as inequalities among women and men has, however, been a problem for women.

Britain has had a distrust of centralized government and a traditional reliance on local and private forms of welfare provisions (Koven and Michel 1993, Introduction). The English state is built on a division of work between the central and the local level with the implication that voluntary organizations, already in the pre-World War I period have played a central role in the administration of welfare. The English state has been characterized as weak or a 'minimal' state, and it has been argued that 'weak' states like the United States, and to a lesser extent Britain, opened a space for women's political activities on the local level that allowed women's voluntary associations to flourish. However, British women, in contrast to their American counterparts, never managed to gain a foothold in the central state (Koven & Michel 1993; 21, Lewis 1994;40)⁵

In terms of *social policy*, Britain has been characterized as a *strong* male breadwinner model where married women in social policies were perceived either as mothers or dependent wives,

not as breadwinners (Lewis & Ostner 1994; 17-19). What has been the relation between welfare and political agency in Britain? The liberal policy of non-intervention in family affairs has historically been a problem for women. There tends to be a contradiction between the general principle of *autonomous* individuals and the discourse on social policy that is based upon a hidden, assumption that married women are *dependent* on their husbands (Orloff 1993).

It was not until after the Second World War that the Labour movement came to play a dominant role in the British welfare state. Since the late 1930s, the welfare state has been inspired by Marshall's ideas about social rights institutionalized in William Beveridge's proposals for universal social policies in two key areas: health care and education. Beveridge noticed the unpaid work of married women, but wives and husbands were treated differently under the National Insurance Act of 1946. Social policies have generally treated women primarily as mothers or dependent wives (Lewis 1994), and there has until recently been a strong political opposition against policies to support "working mothers", for example through child care centres. The private notion of citizenship focusing on the freedom from state intervention in the family has not given women autonomy in the family. There has been a remarkable political consensus about the necessity of leaving the responsibilities for children to parents which contrasts with the strong political struggle about nationalization of industries between Right and Left.

During the latest 20 years, established social rights have increasingly come under strong pressure from Neoconservative political forces, especially in relation to education and health care, and Neoliberal economic policies of privatization have substantially weakened the established social rights of citizens. The perception about a relative passive state in times of mass unemployment has generally been a problem for the weak groups, and it has increased the general problems of families, children, and indeed lone parents, with marginalisation and poverty.

Shifts in Gender Relations

During the latest 20 years, women have increasingly participated on the labour market, and it is remarkable that there are still no child care centres to help working women take care of their children. This raises the question why Britain never succeeded in developing public child care policies. Lovenduski and Randall (1994) are not satisfied with the usual reference to the liberal family tradition of non-intervention. They emphasize the political-ideological climate after the Second World War that has strengthened the liberal vision of the family, but in addition they point to other factors, like the lack of a public institution to overview child care, and more interestingly to a split in the feminist discourse on the role of the state in child care (p 286).

Lovenduski and Randall have discussed the contradictory effects of family policy under Mrs. Thatcher. On the one hand Mrs. Thatcher has intervened in the family to support traditional family values. An example of this is the new Child Support Act from 1991, which sought to compel absent fathers to contribute to the upkeep of their children. On the other hand, the Government has also formulated policies that were much less dogmatic, like the 1987 Family Law Reform Act aimed to eliminate the legal disadvantage associated with illegitimacy and the Children Act (Lovenduski & Randall 1993; 266-69).

In spite of this, it can be argued that the dominant liberal values in the political culture about family matters have only recently been challenged for example by the Commission of Social Justice Report⁶. The report introduces a radical program for social and economic reforms that represent a political alternative to both the passive (welfare) state and the male breadwinner model. (Showstack Sassoon 1996). The report has been an inspiration for Labour's political debate about a renewal of the British welfare state that points toward the need for an active welfare state that combines individual responsibility with collective solidarity. The vision is to prevent poverty through public policies that enable citizens to combine life-long education with wage work and care for the weakest social groups (Social Justice, 1994; 223)

In terms of political citizenship, women have increased their participation in politics and today there are only small differences in women's and men's participation on the mass level (Parry, Moyser and Day 1992). The problem has been how to transform women's influence on the local level, in voluntary organizations and on the grass root level to an influence on national policies. Feminist scholars have suggested that there is a strong masculinity in the British labour movement which has contributed to the exclusion of women from political institutions (Lovenduski & Randall, ch. 5). During the 1980s feminists have increasingly attempted to influence the Labour Party, and during the 1990s, there has actually been a widespread acceptance of quotas for women in Labour Party (Lovenduski & Randall 1993; 141-42). However, in 1992 only 13 % of Labour Mps in the British parliament were women, and in the same election the gender-gap reemerged among women over 35, who voted Conservative in a significant greater proportion than men (Lovenduski & Randall 1993; 157).

The political-cultural support for the principle of cultural diversity and pluralism can be interpreted as a potential for the self-organization of citizens that has strengthened women's abilities to influence the local welfare state, although there has been no spill-over effect to women's influence on the central state. In contrast, political cultural norms and values advocating a separation between the public and the private sphere can be interpreted as an institutional and cultural barrier for further progress in women's material welfare. Britain developed relatively

early a universal welfare state in relation to health and education, and it is an interesting question why social policies of England and Denmark since 1960 have developed in a completely different direction. Why did Britain move so strongly in the direction of a liberal welfare state and Denmark in the direction of a universalistic welfare state during the last 20 years where both have been hit by mass unemployment and influenced by Conservative governments? And what has been the role of the Labour Party and of women's organizations? The conclusion seems to be that during the last 20 years state welfare programs have not substantially improved the social and economic situation for ordinary women. Women have gradually increased their paid employment, but many work part-time or work for low wages and there has been no substantial improvement of creche provisions or maternity leaves. Women have not done well either in terms of welfare or in terms of political influence and power. It is interesting to see to what will be the consequences of a change of Government.

Gender and Citizenship in France

France is a combination of an *active* model for citizenship, where citizens have fought for political rights "from below" through a revolution, and a political culture with a strong emphasis on the public sphere and on public virtues. The republican French model is different from its American counterpart, because it has placed a high value not only of political equality but also on *solidarity/brotherhood* and on the collective responsibilities of citizens (Jenson & Sineau 1994). The French state is an active, centralized state with the objective to regulate both the economy and the family. Public policies have been described as "socialism from above", because the state has collectivized social problems and social costs with the help of "insurance technologies" (Schmied 1995).

The universalism in French political culture has proved to be a strong institutional and cultural barrier for the development of voluntary political organizations and independent organizations in civil society (Rosenvallon 1992). The separation in the republican discourse of public and private has, in practice, often led to a subordination of interests of individual citizens and organizations under the abstract common good, and it has made it difficult to legitimize the vision of cultural and political diversity. The French political scientist Pierre Rosenvallon has pointed to a split in the political culture between a universal vision of radical political equality and an emphasis upon women's 'difference' from men in the family. He has suggested that political citizenship based on a radical individualization can explain why women got the vote

very late compared to the Anglo-Saxon tradition of interest representation that emphasized women's difference as the basis for their citizenship (Rosenvallon 1992;83).

The French vision of republican motherhood, which has historically been influenced both by the Catholic ideal about the virtuous mother and by the socialist ideal of "working mothers", can be seen both as a potential and as a barrier for the advancement of women's rights. France has historically adopted a nationalist population and family policy that has given women social rights as mothers long before they obtained fundamental civil and political rights. Susan Pedersen (1993) has shown that during the thirties, there were disagreements about family policies not only between women's organizations and political men, but also between Christian feminist organizations, like *the Union féminine civice et sociale* (UFCS), and the feminist organisations like *Union pour le suffrage de femmes*. The French government in 1938 introduced a new additional family allowance as a supplement for unwaged mothers "allocation pour la mère au foyer" with the support of UFCS. The adoption of the new social rights to mothers contrasts with the backlash against married women's work in the 1930s. Pedersen concludes that "motherhood was to be "endowed" but women's choice to participate in the new state project was to be simultaneously curtailed" (Pedersen 1993;265). When women finally gained the right to vote in France, it was in connection with the Second World War (in 1944).

Modern feminist scholars disagree about the interpretation of French family policies and their implications for women. Some have emphasized the positive implications of French family policy during the Fourth Republic (1946-1958) where it was generally taken for granted that women as mothers, whether married or single, would receive government assistance through an elaborate system of family benefits (Offen 1991; 151). The politics of motherhood resulted in the adoption of a medical parcel that included full-scale system of state-supported maternity allowance paid to women themselves, as well as free maternity care, prenatal delivery and post-partum. There is no doubt that the economic importance of the financial support for maternity together with family allowances in support of children was considerable for poor women. Other feminists have pointed out that there was an underlying contradiction between the Constitution of 1946 that guaranteed the individual's right to employment and the French Civil Code that strongly supported a male breadwinner model and a stay at home wife with three or more children. Married women's legal situation did not change substantially till the introduction of new family laws in the 1970s (Offen 1991; 150).

Shifts in Gender Relations

Lewis and Ostner have characterized France as a “medium” breadwinner model, because social policies have since the 1970s supported women’s double position as mothers and workers (Lewis & Ostner, 1994;17-19). It can be argued that Mitterand’s Presidency in many ways represents a shift in the dominant discourse about gender and citizenship. Jenson & Sineau have analysed the new discourse about state feminism introduced by Mitterand as part of his policies of modernization of French society. They have shown that since the beginning of his presidency (1981-1994), public policies have consciously tried to strengthen women’s position on the labour market by equality policies to support their roles as working mothers through an expansion of child care centres combined with relative generous benefits toward families with children (Jenson & Sineau 1994).

As a result French policies toward married women and the family have been modernized, and today French women have gained full formal civil and political rights. It is interesting that feminist scholars still have contrasting interpretations of the French case. The American historian Karen Offen is extremely positive and describes the French state as a ‘mother-state’ (*état-mère-de-famille*) where women have finally achieved ‘equality in difference’ (Offen, 1991; 153). This can be supported by the fact, that in terms of women’s labour market participation, France is today the country in the European Union that resembles Denmark most (Hantrais 1992).

Jane Jenson & Mariette Sineau have analysed public policies toward women under Mitterand’s Presidency, and they are more sceptical about the effect of public policies. They discuss the new rather advanced discourse of state feminism introduced by Mitterand, but their evaluation of the outcomes indicate that the ambitious policies have failed: Women have obtained access to formal civil rights, but women’s position on the labour market has not improved, the right to abortion is still threatened, the plans for creation of 300.000 new places in day care centres were forgotten, and finally, there has not been any real progress regarding women’s political presence and power. They conclude that the strategy of state feminism ‘from above’ has failed. They suggest an alternative strategy based on women’s presence at the political level in order to influence policies, especially labour market policies which in periods of economic recessions have serious implications for women, as well as on the integration of the right to abortion as a fundamental civil right (Jenson & Sineau 1994; 341-343).

I conclude that in France, there is a contradiction between women’s welfare and women’s political power. The strong emphasis on the ‘public good’ has been a potential for social policies supporting working mothers, but the political elite has historically subordinated women’s civic, social, and political rights under the national needs. The “illiberal maternalism” of the 1930s

became explicit under Vichy where married women were forced out of work, women's choice to bear children was limited by tightening marriage laws and abortion and contraception were violently repressed (Pedersen 1993; 266). I suggest that the political institutions represents a separate barrier for the advance of *political* equality between women and men and today, women are still marginalised politically and they only make up 6 per cent of the members in Parliament. This has proved difficult to change, because the proposals to improve women's political representation through quotas for women in Parliament have been declared unconstitutional by the Constitutional Council (Jenson & Sineau 1994). The result is a growing gap between women's empowerment in their daily lives as workers and mothers and their lack of political representation, influence, and power.

Gender, Citizenship and the Transition of European Welfare States

The argument of the paper is that there is a need to rethink the relation between the social and political aspects of citizenship from a feminist perspective. There has, till recently, been a problematic division between the different sociological and political science approaches to citizenship. Feminist scholarship has been inspired by Marshall's framework and has tried to develop a more comprehensive approach to citizenship analysing the dynamic between the civil, political and social aspects from a gender perspective with social citizenship as the key aspect. Feminist scholars have shown how the discourse of citizenship was premised on the male norm that citizens were primarily soldiers or workers - and that mothers were only indirectly citizens. The implication is that social citizenship has been premised on the male breadwinner model, and political citizenship on the presence of men and the absence of women. A feminist perspective on democratic citizenship illuminates that the two dimensions in Turners model, the active/passive dimension, and the public/private divide have gendered implications, because men and women have had a different relation to the public arena.

The paper has illustrated how the social and political transformations of European welfare states during the last 20 years from a male to a dual breadwinner model have changed women's social and political roles. Women have become active citizens and increasingly participate on the labour market and in politics, albeit not on equal terms with men. And the vision of gender equality has influenced the discourse of citizenship, although with different effects in the three European welfare states.

The transformation of European welfare states has had the most deep-going consequences for women's citizenship in Denmark. Here universal welfare rights have been the basis for the expansion of women's social and economic rights, and the discourse about active citizenship has stimulated women's access to the public arena. From the Danish context, the new question is what difference women's political presence will make for the transition of the Danish welfare state and for democracy. To what extent do women, as feminists argue, have potentials as newcomers to change the political agenda and public institutions making them more inclusive, and to what extent will political institutions change women? Will women be able to develop a common vision for the transition of European welfare state, or will there be a growing polarization among educated/employed and unskilled marginalised women on the labour market and in politics?

In Britain, the *passive* discourse of citizenship and the strong ideology of individual self-determination has been the basis for a politics of non-intervention in family life advocated by both political parties that has been harmful for all women, especially for non-privileged women from marginalised social groups. The politics of Thatcherism has been ambivalent toward gender and the family. Women have increasingly become integrated as wage workers and their unemployment has during the 1980s and 1990s actually been lower than men's. On the other hand, poverty, marginalisation and exclusion of large groups of unskilled women and men, including lone parents, have been growing. From a women's perspective, one important challenge is therefore to introduce state welfare provisions, including public policies toward children and families, that will improve the situation of poor women and working mothers. The Left has recently introduced a notion of an active state to support working women, and the idea of an active citizenship that includes women and one crucial question is whether Labour can change their male image and convince women to support their policies. Another question is to what extent Labour is willing to help advance women's presence and power in the political elite.

In France, the republican discourse and the political elites have supported an active citizenship and public regulation of family life, as well as private industry. During the Fifth Republic, public policies have given working women, including lone mothers, relatively good possibilities to provide for themselves. During Mitterand's Presidency public policies toward women were modernized by ambitious programs for gender equality in the labour market. State feminism has increased women's position in the state apparatus. However, the strong republican tradition of universal public values and the fear of a fragmentation of the 'common good' has made it difficult for women, and other marginal social groups, to organize separately and to gain

a presence 'as women' in political institutions. Today it is therefore a challenge for women to increase their presence on the public arena through political organization with the objective to gain political equality, influence and power.

The three cases show important national differences in the discourses, histories and practices of citizenship that have gendered implications. Denmark, Britain, and France represent different principles, norms, and visions about private and public virtues as well as different institutional practices. In all the 'classical' welfare states citizenship was based upon the male norm, although the specific evolution of women's social and political rights have been different in Denmark, Britain and France. The dual breadwinner model has been most advanced in the Danish case, and here social policies and active citizenship have both contributed to the changes in gender relations. Since the 1970s, there has also been a modernization of social and family policies in France, and state feminist programs have introduced new principles of gender equality in the labour market. It can be argued that from the perspective of welfare, Britain is the laggard. Conservative governments have been ambivalent toward a modernization of the family- and social policy. Women's wage work has increased, but there has been no real expansion of social service provisions for working mothers. Recently, Labour has introduced a new vision of social politics that in many ways represents a shift in the discourse on gender and citizenship with the objective to help working women by expanding public services.

In terms of *political* citizenship, the new women's movement represents a general tendency toward a more active citizenship for women. During the latest 30 years, women have generally increased their political participation, organization, and representation in modern democracies, and they have gradually moved from the Right to the Left. This tendency has also been most advanced in Denmark, where the discourse on democracy during the 1980s has incorporated gender equality in political representation and power. The British discourse on women and politics has also changed, although it has not had any significant effect on women's presence in political institutions, and in terms of political presence and power for women, it seems that France is the laggard.

In sum, we have found that there is a complicated relation between the discourse of citizenship and public policies on the one hand and women's welfare and political presence on the other. From a comparative perspective, it has been argued that women do best in universal and institutionalized welfare regimes. This is true in the sense that in Denmark welfare provisions and social services have supported working mothers, and women's welfare seems to be the cause rather than the effect of women's agency. During the 1970s, women's empowerment as mothers and workers have contributed to draw women into the political arena, but politics has

also by and in itself contributed to increase women's presence on the political arena. In contrast, neither welfare provisions in terms of creches and maternity leave or women's paid employment have resulted in an improvement of women's political presence in France. The conclusion is that there is no guarantee that the improvement of women's welfare and women's participation as workers will draw women into the political arena. Today feminists hope that women's political presence will be able to transform politics making the political agenda more gender-sensitive. Whether this happens not only depends on women, it also depends upon the national political and economic configuration and on the future development of Europe. During the 1970s, feminist scholars argued that women's social rights were a precondition for increasing women's political participation and power. I suggest that today it may actually be the other way around in the sense that an increase in women's political presence has become a precondition for improving women's social welfare rights.

Notes

1. This paper a revised paper presented in the workshop: Citizenship and the Transition of European (Welfare) States, the ECPR Joint Session of Workshops in Bern, February 27 - March 4, 1997, and later at the 2 seminar of the thematic network: Gender and Citizenship: Social Integration and social Exclusion in the European welfare states, at Turino University, April 4-6, 1997. I want to thank members of the two workshops for stimulating discussions and usefull comments, especially the discussants in Turino Selma Sevenhuisen and Giovanna Zinkone, The paper and the comments have been published in the Scientific Report from the second seminar: The Causes of Women' s Opression; Actors, Processes and Institutions, 1997.
2. In my definition of discourse I am inspired by Nancy Fraser's distinction between the discursive and practical dimensions of social welfare programmse. She defines the discursive or ideological dimension "as the tacit norms and implicit assumptions that are constitutive of practice" (Fraser 1988;146).
3. Selma Sevenhuisen, among others, have suggested that it is not so easy to achieve a synthesis between an liberal "ethics of rights" and a feminist "ethics of care". She argues that the perspective of care points toward a situated narratives and contextualized forms of political judgements, and she has together with Dutch feminists like Trudie Knijn and Jet Bussemaker tried to integrate care in the framework of active citizenship (Sevenhuisen 1997; Knijn & Kremer 1997).
4. In the Danish Investigation of Citizenship we found that in spite of a general tendency toward a homogenisation in political values, there is a growing polarisation in the values of young citizens: Young women tend to be more positive toward the welfare state than youn g men. This can be interpreted as a growing split between women's solidaristic values and men's liberal values, or as a split between new forms of collectivism and individualism (see Christensen 1997).
5. There is an interesting debate about the role of women's agency in the building of the British welfare state (Thane 1993, Lewis 1994). Lewis is suseptical of women's influence arguing that women have played a little part in the construction of the core elements of the British welfare state. Thane is more positive about women's role in influencing social policies and she stresses that women have a share of the making of the post World war II British welfare state through their activities in the Labour Party (Thane 1993; 351).
6. The Commission of Social Justice was set up by the Labour Party in 1992 with the goal to analyse the need for economic and social reforms in the UK. The analysis was made by a group of independent experts from the "Institute for Public Policy Research", an independent think tank Left of the Centre (preface, Social Justice, 1994)

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Abstract

The objective of the paper is both to develop the framework of citizenship from the perspective of gender, and to compare the recent changes in women's citizenship in Denmark, Britain and France. It is suggested that one crucial element in a gender sensitive framework for citizenship is the dynamic interplay between social and political citizenship. The paper draws upon the two different approaches T.H.Marshall and Brian Turner to study the interconnection between social and democratic citizenship. The paper shows that there is a complicated relation between the women's social rights and political presence. In Denmark social policies have been favorable for the advance of women's political citizenship. However, the comparison between Denmark and France shows that there is no guarantee that expanding women's social citizenship will automatically improve women's democratic citizenship. During the 1970s, feminist scholars argued that women's social rights were a precondition for increasing women's political participation and power. I suggest that today it may actually be the other way around in the sense that an increase in women's political presence has become a means to improve women's social welfare rights.

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Joan Vuust, Aalborg University, Fibigerstraede 2, 9220 Aalborg Oest

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GEP - THE RESEARCH PROGRAMME GENDER, EMPOWERMENT AND POLITICS

THE RESEARCH PROGRAMME GENDER, EMPOWERMENT AND POLITICS (GEP) deals with the changing political importance of gender in modern societies. During the last 30 years, women have moved from a position of political powerlessness to political presence and influence in the Danish democracy. Women's new role in politics has had deepgoing consequences - not only for women but also for men.

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The programme emphasises two factors: First analysing processes and patterns behind the double tendencies toward empowerment and social exclusion of social groups in terms of gender and class. Secondly, the differentiation within the group of women and men analysing the interplay between gender and class. Maintaining the perspective of gender, these differentiations will make visible the differences of generations as well as the differences between the educated/employed and the marginalized groups.

Questions connected with public equality politics, the increasing representation of women, women's participation in the local political communities and the political elite, as well as strategies against marginalization and poverty will be discussed through projects and case studies.

ANETTE BORCHORST
Department of Political Science
Aarhus University
Universitetsparken
DK-8000 Aarhus C
Phone: +45 89 42 11 33
Fax: +45 86 13 98 39
E-mail: ab@ps.au.dk

DRUDE DAHLERUP
Department of Political Science
Aarhus University
Universitetsparken
DK-8000 Aarhus C
Phone: +45 89 42 11 33
Fax: +45 86 13 98 39
E-mail: drude@ps.au.dk

JOHN ANDERSEN
Department of Social Sciences
Building 23.1., PO 260
Roskilde University
DK-4000 Roskilde
Phone: +45 46 75 77 11
Fax: +45 46 75 66 18
E-mail: johna@ruc.dk

ANN-DORTE CHRISTENSEN
FREIA - Feminist Research Center
Department of Development and Planning
Aalborg University
Fibigerstraede 2
DK-9220 Aalborg Oest
Phone: +45 96 35 80 80
Fax: +45 98 15 32 98
E-mail: adc@i4.auc.dk

JØRGEN ELM LARSEN
Department of Sociology
Copenhagen University
Linnésgade 22
DK-1361 Copenhagen K
Phone: +45 35 32 32 80
Fax: +45 35 32 39 40
E-mail: Joergen.Elm.Larsen@
sociology.ku.dk

BIRTE SIIM (COORDINATOR)
FREIA - Feminist Research Center
Department of Development and Planning
Aalborg University
Fibigerstraede 2
DK-9220 Aalborg Oest
Phone: +45 96 35 80 80
Fax: +45 98 15 32 98
E-mail: siim@i4.auc.dk

JENS PEDERSEN-ULRICH
(PH.D.-STUDENT)
Department of Development and Planning
Aalborg University
Fibigerstraede 2
DK-9220 Aalborg Oest
Phone: +45 96 35 80 80
Fax: +45 98 15 32 98
E-mail: ulrich@i4.auc.dk

GERDA THORSAGER
(PH.D.-STUDENT)
Department of Sociology
Copenhagen University
Linnésgade 22
DK-1361 Copenhagen K
Phone: +45 35 32 39 45
Fax: +45 35 32 39 40
E-mail: gerda.thorsager@
sociology.ku.dk

JOAN VUUST
(SECRETARY)
Department of Development and Planning
Aalborg University
Fibigerstraede 2
DK-9220 Aalborg Oest
Phone: +45 96 35 80 80
Fax: +45 98 15 32 98
E-mail: joan@i4.auc.dk