

## Chapter 9

# QUESTIONING THE SWEDISH MODEL OR EXPORTING IT?

## IDENTITY EUROPEANIZATION IN THE PROSTITUTION POLICY FIELD

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This chapter explores how Swedish civil society organizations handle conflicting frames<sup>1</sup> and identities at the national, European, and international levels in their interaction with other organizations, in particular when such interactions take place within umbrella organizations. Hence the chapter aims at addressing how identity Europeanization relates to organizational Europeanization (see chapter 1) by drawing on theoretical perspectives about framing and identity in social movements (Benford and Snow 2000; Polletta and Jasper 2001) and the organizational theory of meta-organizations (Ahrne and Brunsson 2005).

Interacting with CSOs that are embedded in other contexts, Swedish organizations might encounter frames and identities that are at odds with their own. Furthermore, they might have to interact in contexts where such frames and identities are dominant while their own are interpreted as divergent from the norm. Sometimes such interactions take place inside European or international umbrella organizations of which Swedish CSOs are members. From being accustomed to having many like-minded organizations around them in one context, they might actually end up being isolated and delegitimized in another, or vice versa. Clashes of frames and identities are particularly pertinent in the prostitution policy field (Scaramuzzino and Scaramuzzino 2015). In Sweden, there is a strong consensus against the legalization of prostitution and against defining prostitution as sex work,

a position that is in contrast with how the issue is viewed in many other European countries. Hence the study focuses on Swedish organizations that are active in the prostitution policy field and are members of umbrella organizations and federations at the European or international level.

While the Swedish model has been criticized abroad, all political parties represented in the Swedish Parliament, and most of the CSOs, are in favor of the Swedish ban on the purchase of sexual services that was introduced in 1999. There is also an ambition to export the model to other countries, not least through European Union (EU) institutions (Scaramuzzino and Scaramuzzino 2015). The Swedish legislation only criminalizes the purchase of sexual services and not sales, and it defines prostitution as a form of violence against women. The focus of the interventions is not on harm reduction, but rather on preventive social work and protection that enables sex-service providers and sex clients to exit prostitution (Scaramuzzino 2014).

Even if the EU has no direct mandate in the prostitution policy field, the past decade has witnessed closer cooperation and coordination between member states concerning trafficking in human beings for sexual purposes. Furthermore, the recent nonbinding resolution in the European Parliament in 2014, in favor of the Swedish model, raises the question of whether we are witnessing the rise of a common European prostitution policy model (Scaramuzzino and Scaramuzzino 2015). Such developments are strongly intertwined with developments at the national level where Sweden plays a key role. The European prostitution policy model might in fact be interpreted as a successful export and translation of the Swedish model into EU institutions. These processes can be understood in light of the increasing regulatory Europeanization of the prostitution policy field.

While there seems to be a strong consensus on these issues in Sweden, conflicting framings can be a challenge for Swedish organizations when interacting at the European level, as shown by the results of the EURO CIV survey (see chapter 3). When asked the question, "If your organization is affiliated with or takes part in a European network or federation, how problematic do you experience the following?," all women's organizations in the sample agreed that, "There are too large ideological differences between the participating organizations" (average for all CSOs: 33 percent). Even if such a statement is not necessarily related to the prostitution policy issue, it shows that organizations that work with gender issues, including prostitution (at least in a Swedish context), perceive a clash between their own perspectives and other CSOs that are affiliated with the same umbrella organization.

The empirical material consists of information on websites and social media as well as written online documents and five interviews with representatives from Swedish CSOs. The study on the Internet was informed

by a connective approach. Starting with studying websites commenting on particular episodes of conflict (described later on in the chapter), we followed links to other websites and posts on Facebook and Twitter over the course of almost two years (December 2012 to August 2014). We explored the content and further connections and performed qualitative content analysis of the texts (cf. Hine 2003; Scaramuzzino 2012). We also found written documents such as open letters and articles that were downloaded from the websites and from social media. The interviews were conducted between April 2013 and March 2015 in Swedish. All empirical material in Swedish has been translated by the authors in the quotations presented in this chapter.

### **The Swedish Prostitution Policy Model as a Frame**

The prostitution policy field in Sweden has been dominated since the 1970s by a gender perspective and more specifically by a radical-feminist approach. One of the main conquests of the women's movement in this policy field is the ban on the purchase of sexual services—a ban that criminalizes the purchase but not the sale of sexual services. A main argument behind the reform was that by reducing the (male) demand for prostitution, (female) supply would also be reduced (Skilbrei and Holmström 2013). From a broader perspective, the Swedish approach to prostitution might be interpreted in the light of a tradition of an interventionist state with an ambition to eradicate social problems through both preventive and repressive measures, similar to policies on child protection and drug-abuse treatment. This interventionist approach has been argued to pursue social justice and equality (cf. Lorenz 2006) as well as to impose moral norms and regulation on citizens, and especially vulnerable and marginalized groups (cf. Berggren and Trägårdh 2015).

Scaramuzzino and Scaramuzzino (2014) have argued that the Swedish prostitution policy model promotes a gender-equality and gender-policy perspective rather than a social-welfare perspective on the issue of prostitution. Because prostitution is framed as an issue of gender equality, the women's movement has become the natural collective actor for interest representation in the policy field (Erikson 2011). The sex-workers movement has had a weak position in the debate, not least because of lack of resources and legitimacy. The shift of focus from the providers of sexual services to the buyers in the Swedish policy model on prostitution has made their position less relevant, as stated in the most recent evaluation of the law (Swedish Government 2010, 59, authors' translation): "Also in our country, advocates for prostitution argue that you can distinguish between voluntary and

nonvoluntary prostitution, that adults should have the right to freely sell and buy sex and that the ban on the purchase of sexual services is an anachronistic sexual moral position. From a gender and human rights perspective and with the shift of focus from the supply, i.e., the prostitutes, to the demand, i.e., the traffickers, procurers, and buyers who use other people to satisfy their own or others' sexual needs, the distinction between voluntary and nonvoluntary prostitution becomes irrelevant." Because of the strong consensus in favor of the law and the important symbolic value it has been given for the achievement of gender equality in society, mobilization against the national policy on prostitution has been weak. Until recently open criticism toward the ban has mostly been communicated on the Internet by actors who have been organized in the shadows (Scaramuzzino and Scaramuzzino 2014).

Recent events related to the European and international level have sparked intense debates in Sweden on how to handle conflicting norms and values. The intensity of these debates might partly be related to the symbolic value of the Swedish law both for its supporters and its critics. Two episodes and related debates will be addressed in this chapter. One was around the funding by the Swedish International Development Cooperation Agency (SIDA) to Mama Cash, an organization supporting sex workers' organizations around the world. The other took place among Swedish CSOs around a policy document produced at the international level by the New York-based international organization UN Women advocating against criminalization of sex clients. These two episodes raise questions about how Swedish CSOs handle a national context that is strongly dominated by a framing of the prostitution issue in terms of criminalization of the sex client (and in terms of gender equality) and a European and international arena where other frames are more accepted and clearly competing with the Swedish prostitution model. These policy models or regimes are often labeled as tolerance or legalization models; they consider prostitution as a necessary evil (tolerance) or as legitimate work (legalization), placing transactional sex in the private sphere (tolerance) or the market (legalization) (Scaramuzzino and Scaramuzzino 2015).

### **Linking Framing, Identity, and Organizational Affiliation**

When considering CSOs as subjects in and objects to identity Europeanization, we need to relate to and understand the ways in which frames and identities are constructed, used, and changed in interaction with other organizations.

In social movement theory, frames have been defined as "action-oriented sets of beliefs and meanings that inspire and legitimate the activities and

campaigns of a social movement organization” (Benford and Snow 2000, 614). Different framings of prostitution by social movements are not only mirrored by different positions in feminist theory but also by different prostitution policy regimes or models that have been developed over the years. The major divide is between considering prostitution as a form of gender- or economic-based oppression and domination and the view of prostitution as work or a lifestyle that women can choose (Outshoorn 2004, 9; see also Zatz 1997). Different prostitution policy regimes might be seen as specific frames that are institutionalized in national systems and that coexist at national, European, and international policy levels (Scaramuzzino 2014; Scaramuzzino and Scaramuzzino 2015). At the risk of oversimplifying, we might say that these frames define prostitution as sex, work, or violence, and that these different frames are used by organizations active in the prostitution policy field (Scaramuzzino and Scaramuzzino 2014).

Framing also implies identity construction. Framing processes tend to link individual and collective identities as well as to reinforce and support collective identities as such. This is done at a general level by placing different actors in time and space, giving them attributes that put them in relationship to each other, and suggesting lines of action. At a more concrete level, such processes take place when adherents and activists engage in identity discussions but also in communication with the wider society such as press releases and public pronouncements (Benford and Snow 2000).

When social movements spawn formal organizations (so-called social movement organizations), these collective identities tend to become organizational identities. An organization that defines itself as a grassroots organization for sex workers and that makes claims for sex-workers’ rights in its pronouncements on their webpage, through Twitter, or on a banner at a demonstration or in the media is framing prostitution in accordance with a specific scheme of interpretation (Scaramuzzino and Scaramuzzino 2015). At the same time, it is constructing its own collective identity and implicitly also the identity of its adherents.

Collective identity might be defined as “an individual’s cognitive, moral, and emotional connection with a broader community, category, practice, or institution. It is a perception of a shared status or relation, which may be imagined rather than experienced directly, and it is distinct from personal identities, although it may form part of a personal identity” (Polletta and Jasper 2001, 285). The rise of collective identity as a theoretical concept in the study of social movements has challenged early resource mobilization and political process accounts that strategic choices are merely a product of rational choice. While collective identity might be a matter of strategic choice, the choice of strategies is influenced by collective identity. Identity claims can in fact on the one hand be seen as strategic action (Polletta and

Jasper 2001, 293–94), as in the case of a sex worker-led organization that is, in addition to claiming an identity, also framing prostitution as work rather than as sex or violence. On the other hand, even if the repertoire of possible strategies is very broad, including demonstrations and lobbying as well as relying on volunteers and/or employing professional consultants, collective identity makes specific strategic actions more viable than other strategies (Polletta and Jasper 2001, 293–94). For a grassroots organization, it is easier to engage in the mobilization and capacity-building of its constituents than it is to hire professional bureaucrats to work with campaigning and lobbying.

Because collective identity is also constructed and negotiated in a social movement organization in relation to the individual identity of its adherents, it might be argued that the same goes for umbrella or meta-organizations. The collective identity of these federations should be seen as a process of identity construction and negotiation between member organizations with their own specific collective identities. When Swedish CSOs become members of national and international networks or federations of organizations, they enter a process of identity construction that involves organizations from other national contexts that might carry different frames and identities.

When it comes to meta-organizations, their identity “is defined by its members to a much greater extent than an individual-based organization” (Ahrne and Brunsson 2005, 437). Because meta-organizations tend to resemble their members, not least because they both consist of organizations, they need to ensure certain homogeneity in terms of both goals and identity. They would, in fact, try to enroll as many organizations as possible of the kind they aim to represent, such as all sex-workers’ associations with certain goals and values related to sex workers’ rights (cf. Scaramuzzino and Scaramuzzino 2015). Such striving for representativity as well as for homogeneity easily sparks conflicts in meta-organizations both between members and between members and the meta-organization itself; attempts to impose or secure certain similarities are likely to encounter resistance among members (Ahrne and Brunsson 2005).

Homogenization or isomorphism within organizational fields has been highlighted in previous research, especially through the contribution of neo-institutional theory (Di Maggio and Powell 1983). When it comes to the field of prostitution policy, which is mostly regulated at the national level, we can assume the isomorphic processes to be mostly in play among organizations that are active in the same national environment. When Swedish CSOs interact with European or international environments and organizations embedded in other national contexts, we can assume that they will meet a larger variety of organizations and hence a larger variety of collective identities.

## Which Actors? Broadening the Perspective

While previous research on social movements and civil society in the prostitution policy field has mostly been focused on the mobilization of sex workers (e.g., Andrijasevic et al. 2012; Gall 2007, 2010; Garofalo 2010; Lopez-Embury and Sanders 2009; Scaramuzzino and Scaramuzzino 2015), this study broadens the perspective by also including a focus on other movements and actors. As mentioned, we will focus on two episodes in which prostitution policy–related inputs from the European or international level have sparked debate among Swedish CSOs around conflicting views.

We will also analyze the way in which five Swedish CSOs active in the prostitution policy field and affiliated with European or international networks or umbrella organizations handle different views expressed at different geographical levels. All of the organizations have been involved in at least one of the above-mentioned episodes and are described in table 9.1.

**Table 9.1. The CSOs Involved in the Study**

Name	Description	Affiliation
Rose Alliance	Organization for sex and erotic workers	ICRSE (International Committee for the Rights of Sex Workers in Europe)
UN Women Sweden (Swedish National Committee for UN Women)	Women's organization	(United Nations Entity for Gender Equality and the Empowerment of Women)
SWL (Swedish Women's Lobby)	Women's organization	EWL (European Women's Lobby)
RFSU (Swedish Association for Sexuality Education)	Swedish Association for Sexuality Education	IPPF (International Planned Parenthood Federation)
RFSL (Swedish Federation for Lesbian, Gay, Bisexual, and Transgender Rights)	LGBT organization	ILGA (International Lesbian, Gay, Bisexual, Trans, and Intersex Association) Transgender Europe

## Funding by Swedish Standards?

The above-mentioned funding of Mama Cash by SIDA started an intense debate and led to conflicts among Swedish CSOs arguing for or against the

fact that SIDA was indirectly financially supporting organizations that were advocating for sex work. Some of these organizations were also openly critical of the Swedish prostitution policy. Several organizations, in particular the Swedish Women's Lobby (SWL), and many politicians demanded that SIDA should stop giving aid money to organizations such as Mama Cash. A Swedish politician and member of the European Parliament (MEP) stated (Dagens Arena 2012b), "SIDA's support and aid strengthens the organization [advocating for sex work] as a whole. Money, which according to SIDA should not go to campaigns for prostitution, can of course be redistributed and ultimately used for this purpose anyway. When a Swedish aid program gives money to an organization, it is also legitimizing their work. SIDA's action is at best an example of tremendous naivety and in the worst case a lack of understanding of how the sex slave trade actually works in the world today."

The critique that SIDA's funding of Mama Cash was supporting and legitimizing the idea that women's bodies could be bought was echoed by a representative from the SWL: "Mama Cash's view on prostitution is contrary to the Swedish stance that it is a form of violence to purchase another person's body for one's own pleasure" (OmVärlden 2012).

SIDA defended their actions and the funding of Mama Cash: "Mama Cash is doing a great job and they are one of the few actors that really reach out to these grassroots' organizations for extremely vulnerable women" (Dagens Arena 2012a). The Swedish Association for Sexuality Education (RFSU) also went public and officially supported SIDA's position, stating that several of the women's organizations that RFSU was cooperating with got support from Mama Cash and would not survive without their help: "For RFSU this is not about promoting sex work. This is about assuring that people get their fundamental rights such as not to be harassed or raped by the police, to be able to report when having been victims of crimes, and getting access to condoms and safe sex or medical care when they need it" (RFSU 2012).

This short description of different positions shows conflicting views within Swedish civil society on whether Swedish public funding should support organizations that carry frames and identities that are at odds with the Swedish model. It was also revealed that Mama Cash not only gave funds to sex workers' organizations abroad, but also financially supported Rose Alliance, a Swedish (domestic) sex workers' organization, through a specific fund aiming at supporting groups that worked with sex workers' rights (OmVärlden 2012). When it was revealed that Rose Alliance also received money from the Swedish state, the conflict became even more intense, as described by a representative for the organization (interview Rose Alliance): "It was a nightmare, and ended up as a personal attack. Journalists from



newspapers called, and I was accused of being a recruiter for the sex industry. It was bizarre. We received money from Mama Cash, but the contract stated that SIDA's money may not be given to sex workers' organizations. Their argument was that SIDA's money strengthened Mama Cash. But RFSU was really good. They went out straight away and defended it." According to the interviewee, Rose Alliance received a small amount: twenty thousand euros a year. It was not enough to rent an office, but they could use it to strengthen their work as well as their cooperation with other organizations at the European level. Critics accused SIDA of being naive and of indirectly supporting Rose Alliance in Sweden. They stated that if any organization for and by prostitutes should receive support in Sweden, it should have been PRIS (Prostitutes' Revenge in Society), which supported the Swedish view of prostitution as violence against women and, unlike Rose Alliance, was supportive of the Swedish sex purchase law (OmVärlden 2012).

### **Swedish Organizations Interacting on Different Geographical Levels**

The episode above shows that when Swedish CSOs interact at supranational levels (European or international) they might meet frames and identities that have a weak position in a Swedish context.

#### *Defending and Exporting the Swedish Model*

For organizations such as the Swedish National Committee for UN Women (UN Women Sweden) and the SWL, this means interacting in environments where their framings and identities might be challenged to a greater degree than they are used to in Sweden.

The SWL described prostitution, trafficking for sexual purposes, and surrogate motherhood as being among the most important issues to oppose to when it comes to violence against women. The fight against these phenomena was at the core of the organizations' framings and identities, and they argued that a woman's body is not, and should never be seen or treated as, a commodity: "This is a very important issue for us . . . and for the women's movement" (interview SWL).

In following these organizations' activities on the Internet and interviewing their representatives, four sets of beliefs and meanings could be identified. The first is to curb the demand, following the logic that if there is no demand for purchasing sex or for purchasing babies from women who rent their bodies there will be no prostitution, trafficking, or surrogacy:

“Our main point is to address the demand because it is the very key to the issue” (interview UN Women Sweden). The second is that prostitution and trafficking cannot be separated because they are two sides of the same coin: “If there is no prostitution, there will be no trafficking, and vice versa” (interview UN Women Sweden). The third is that it is important to eliminate poverty and not to accept poverty as a reason to further the oppression of women, for example by defining and treating prostitution as work or tolerating surrogacy. The fourth is that no one has the right to have a child at the expense of someone else.

These four sets were described not only as important for how UN Women Sweden and the SWL perceive themselves, but also as important for guiding their lines of actions and constructing the identity of its adherents. The biggest challenge was reported to be the new sex industry that according to these organizations was continuously breaking new ground: “The sex industry often operates undercover and tries to influence organizations in order to make them use the language of ‘sex work,’ even within the UN system” (interview SWL). According to the interviewee, while selling sexual services could not in any way be viewed as work, the sex industry was methodically pursuing such an agenda and with huge financial resources.

But the new sex industry was described as having more influence on organizations at the EU and international levels, where the SWL also experienced views that were more conflicting. According to the representative for UN Women Sweden, both in the EU and the UN there are many men in positions of power and responsibility and, like in society at large, there are also within these systems male power structures obstructing the fight against prostitution. In fact, putting the issue on the agenda in the EP required a strategic move of reminding the mostly male audience of this, as recalled by the interviewee (interview UN Women Sweden): “A female police detective said: ‘Yes, every month the European Parliament moves to Strasbourg and women are moved there, by bus, to serve them.’ And it was like dropping a bomb as journalists from newspapers from all over the world were present. So, when we eventually wrote our report about what had to be done, there was no man who dared to vote against it.” According to the interviewee, it is not only male politicians in the EP but also, and even foremost, men in the third world who do not see prostitution as an important issue to rise up and fight against. Both the SWL and UN Women Sweden work at both the European and international level lobbying for women’s rights. They also cooperate with many organizations around the world on prostitution and other issues related to women’s rights and gender equality. They stated that they have also been very successful in translating and promoting the Swedish model at the EU level through umbrella organizations such as the EWL and public institutions such as the EP and through international

cooperation with women's organizations in other European countries: "It is clear that the attempt to legalize prostitution in order to control the market doesn't work. Experiences from Germany and the Netherlands show that they have huge problems with trafficking and other types of organized crime that come with a legalized prostitution market" (interview SWL).

From a strategic-choice perspective, this might be interpreted as an effective strategy against an industry that had Europeanized its exploitation of women—namely to Europeanize the Swedish model by exporting the Swedish policy on prostitution to the rest of Europe.

### *Questioning and Criticizing at Home and Abroad*

Compared to UN Women Sweden and SWL, both RFSU and the Swedish Federation for Lesbian, Gay, Bisexual, and Transgender Rights (RFSL) presented frames and identities that were more at odds with the Swedish model. According to the representative for RFSU, it is important to reduce the demand for sexual services but also to defend the rights of the people who are selling sexual services: "We want Sweden to adopt a harm-reduction perspective" (interview RFSU). While there were different ways of understanding and naming the phenomenon within RFSU, including prostitution and sex work, the majority of the congress of June 2015 chose to adopt the term "transactional sex."

Instead of equating prostitution and surrogacy, the representative for RFSU compared prostitution and abortion. Accordingly, the interviewee argued against extending the ban on the purchase of sexual services to transactions made abroad, something many CSOs (including the SWL) had been pushing for. The argument was that it would be a dangerous logic in the same way as if countries like Poland would make it illegal for women to come to Sweden to have an abortion or if Russia decided to make it illegal for LGBT persons to advocate for gay rights when they were in Sweden.

RFSL's activities in the prostitution policy field were not described as pushing for a change of the law. However, the organization had expressed its position in different forums (e.g., investigations on behalf of the government), including their critique of the negative consequences of the law on HIV prevention and the need for better support for people selling sexual services: "When our opinions have been requested, we have simply brought them forward, but we have not given priority to actively pursuing a legislative change" (interview RFSL).

The legislation on prostitution was not a priority for RFSU either, even if they found themselves at the center of an intense debate because of a report they had commissioned. The conclusions were used to criticize the

Swedish prostitution policy, even if criticizing the law was not the original intention of the report (interview RFSU):

This debate that has flared up has grown to unreasonable proportions. It is a part of our work, but we work with so many other questions as well. Some of the biggest questions we address internationally are the right to abortion, maternal mortality—every day 800 women die because of maternal mortality. We work with HIV, with masculinity and how to tackle the traditional male role to curb violence against women; we work for the right to have access to sexual education, access to contraception and so on. We have also been advocating for the implementation of harm-reduction measures in Sweden for people involved in transactional sex, both the buying and selling part. When it comes to advocacy, we have, however, not put so much effort in either attempting to export the Swedish sex purchase law or trying to discourage the export of it. At the international level we have partner organizations in many countries, and some of our partners work actively with people who sell sex. So, in that way you could say that we also work with the issue internationally. We support these partner organizations, which are usually member-based and grassroots organizations, financially and with organizational knowledge and so on.

While both RFSU and RFSL have chosen a framing of the prostitution issue that is more critical to the Swedish model, their organizational identities are less bound to this issue. They both, however, consider themselves as feminist organizations that work for gender equality. According to the representative for RFSL, in the global feminist movement it is much easier to find organizations that work with sex workers' rights and have an opposite approach than the Swedish feminist movement. Globally, it is much more common that the feminist movement is fighting to destigmatize sex work and ensure fair treatment and human rights. At big international conferences about HIV prevention "the 'Swedish model' is sometimes seen as something very negative" according to the interviewee from RFSL. Seen from a global perspective, the transgender movement and the sex workers rights' movement are also closely linked because many transgender persons are involved in the sex industry and are in a vulnerable position, according to the representative from RFSL.

The same interviewee described a political climate where "it has become more difficult to have a discussion about prostitution in Sweden. People and organizations that are skeptical or that question the sex purchase law are placed in the corner together with those who do not care about women's rights" (interview RFSL). In a Swedish context, the RFSU and RFSL are sometimes treated as antifeminist, according to the representatives, especially when they question the positive effects of the legislation or demand more supportive measures for, and less stigmatization of, people selling sex: "We have a feminist and intersectional approach, which means that we also

acknowledge other power structures besides gender. I am as much a feminist as they are, and IPPF [International Planned Parenthood Federation] is a feminist organization. But you draw different conclusions depending on what perspective you have" (interview RFSU).

RFSU's framing of prostitution and identity are sometimes at odds with the general dominant frame in Sweden, but sometimes also with the frames at the European and international levels, according to the interviewee. In these settings the RFSU is not perceived to be sufficiently critical of the Swedish sex purchase law. The representative for RFSU could see some positive effects with the Swedish model, whereas both IPPF and the Joint United Nations Programme on HIV/AIDS (UNAIDS) have been very critical. The representative described how the RFSU has been internationally engaged in projects concerning sexual and reproductive health and rights for many years, stating that RFSU's extensive international contacts in many different countries has influenced how they see things. While the organization strives to have an international perspective, it is also influenced by how prostitution has been framed in the Swedish context. Compared to RFSU, RFSL seems to be less active in the prostitution policy field at the European level. RFSL is affiliated with the umbrella organization ILGA Europe (International Lesbian, Gay, Bisexual, Trans, and Intersex Association), but ILGA has not taken any stand on the issue according to the interviewee: "They do not have any big and clear platform for that yet. It is not their focus, however" (interview RFSL). Transgender Europe, to which RFSL is also affiliated, has been more active and has taken a clear stand against EWL's campaign "Together for a Europe free from prostitution," which EWL launched in 2011.

It is difficult to assess to what extent the choice by RFSU and RFSL not to focus on legislation was a strategic choice due to the harsh political climate at the time. However it is clear that Rose Alliance had made the choice of not engaging in prostitution policy issues at the domestic level, even if the issue, for an organization by and for sex workers, was indeed relevant for the organization's framing and identity (interview Rose Alliance): "After the sex purchase law was introduced, it was very difficult to work in Sweden. If you said anything, even if it was not something dreadful, and expressed that sex workers were feeling very bad, nobody would listen. There was no room for it at the time. But about five years ago, we changed our name from ROSEA to Rose Alliance, and now we are trying to become a member-based organization." Because it was so difficult to advocate for sex workers' rights in Sweden at the time, ROSEA (now Rose Alliance) started to engage more on the European level. For example, the organization participated in the European conference Sex Work, Human Rights, Labour and Migration, which was held in Brussels in 2005. This conference was also mostly funded

by Mama Cash (interview Rose Alliance). One of the goals of the conference was to start a European network of sex workers' organizations as well as of individual sex workers and supporters, both individuals and organizations. "The second day 80 allies came; it was everything from Amnesty International to the International Labour Organization, organizations that we didn't have any problems cooperating with" (interview Rose Alliance). After the conference the International Committee for the Rights of Sex Workers in Europe was established as a European meta-organization with Rose Alliance among its members.

After facing difficulties making its voice heard in Sweden, Rose Alliance made the strategic choice to not engage in prostitution policy but rather in harm-reduction social work and access to rights for their constituencies. However, Rose Alliance continued to perceive the supranational level as much less hostile to its framing of prostitution and its organizational identity and used that level strategically to strengthen its position at the national level in Sweden: "The EU has shown quite clearly that they are not afraid of giving financial support to sex workers' organizations. For example, we got money from the Leonardo program [Leonardo da Vinci Programme for vocational education and training, replaced by Erasmus+ program]" (interview Rose Alliance), which, according to the interviewee, resulted in other projects at the EU level. Such funding also made it possible to start a network and a web-based platform for sex workers' organizations, as well as other users' organizations: "The website provides an opportunity to be seen and to organize" (interview Rose Alliance). The aim was to increase the quality of life for many different marginalized groups in Europe, such as sex workers, drug users, migrants, MSM (men having sex with men), and people living with HIV and AIDS by improving their access to medical and social services.

Rose Alliance's work and cooperation with other organizations at the supranational level has made it much easier to also get funding in Sweden, according to the representative: "It is much easier to go back to Sweden and ask for money when we can say, 'Look, we have done all this.' This was not possible ten years ago. It has been a big change, because of this, and we are now starting to see a strong grassroots movement in Sweden. This is a direct result of the EU" (interview Rose Alliance). It is clear that Rose Alliance, RFSU, and RFSL tend, at the national level, to focus on the help and support that people with experience of prostitution were in need of rather than on the legislation on prostitution, in their framing. Even if it is not necessarily in the organizations' intentions to avoid conflict, these frames, which were inspired and supported by the debates at the European and international levels, have been more viable and less controversial in Sweden than directly criticizing the law.

## When New York Calls

The UN Women's "Note on Sex Work, Sexual Exploitation and Trafficking" sparked conflict among Swedish CSOs. In the note, which was published in October 2013, the New York-based organization stated that it was important not to consider sex work in the same way as trafficking or sexual exploitation and that it was important to recognize the right of all sex workers to both enter and leave this activity. They also advocated for not criminalizing sex workers or clients (UN Women 2013a): "The views of UN Women on the subject are grounded in the relevant human rights principles and provisions, intergovernmental normative frameworks, and the best available scientific and epidemiological evidence. UN Women is attentive to the important input of civil society across the wide spectrum of opinion that pertains to the subject."

With this note UN Women framed prostitution and trafficking for sexual purposes as different phenomena that should be tackled differently. To gain legitimacy for how they framed these issues, they claimed that both science and civil society supported their view. Many Swedish CSOs (including the SWL and some of its members) reacted critically to this statement and demanded that UN Women Sweden should distance itself from the headquarters of UN Women in New York. UN Women Sweden reacted by criticizing the meta-organization of which they themselves were a member.

This episode shows how the statement by UN Women's office in New York intruded on its member organizations' autonomy and thus created competition and tension within the organization (cf. Karlberg and Jacobson 2014): "It made us choke when we saw that the letter from the headquarters in New York was an argument for sex work, and we exploded" (interview UN Women Sweden). UN Women Sweden wrote a letter expressing concern about the content of the note and the fact that it was brought to their attention by other organizations (UN Women Sweden 2013):

We refute vividly both the way the note has been brought to our attention and its political standpoint. On issues which are controversial the UN Women are not supposed to express an opinion. This position was communicated to the chairperson of UN Women National Committee Sweden, about a year ago, when she asked about the position of UN Women on surrogate motherhood. UN Women responded that it does not express an opinion on controversial issues, but leaves it to each member state to form an opinion. From the present note, we find that UN Women has made a policy change on an issue that divides the world, and where the Northern European and the global women's movement fight for recognition of fundamentally different values.

As the quotation shows, there were conflicting framings within the meta-organization, framing prostitution either as work or as gender-based violence; these framings were fundamentally different and perhaps irreconcilable. The conflict can be interpreted as identity management of inherent conflicting forces within a meta-organization. All members of the meta-organization in fact claim to be unique at the same time as the member organizations are dependent on each other and based on similarity. The biggest sacrifice for the member organizations would be to lose their autonomy (Karlberg and Jacobson 2014). As the quotation shows, one solution for the meta-organization could be not to express an opinion when it comes to controversial issues. In the responding letter, UN Women Sweden, together with their “sisters and brothers around the world,” presented their alternative frame: “We are numerous actors who have worked with this issue for many decades. We have been very successful in our fight against prostitution and can therefore not accept the views expressed in the note by UN Women” (UN Women Sweden 2013).

In this case, and because of how important the issue of prostitution and trafficking is for the identity of UN Women Sweden, the conflict became serious: “We have reacted and it would be devastating if UN Women in New York, our top organization for women’s right, started to take a stand for the sex industry. If they would do so, I think many national committees would speak up and leave the organization” (interview UN Women Sweden). Other organizations, such as the feminist organization Women’s Front (Kvinnofronten), also wrote open protest letters to put pressure on UN Women to retract their statement.

In the responding letter the international organization UN Women tried to clarify its position: “UN Women has not issued any official statement on sex work. We have sent an email to some NGOs who have written to UN Women raising their concerns on the issue of criminalizing or decriminalizing the ‘sex industry’” (UN Women 2013b). This statement can be interpreted as an attempt by the headquarters in New York to step back to keep the meta-organization together. After the protests both outside and within the meta-organization, they had to emphasize that this was not an official statement, as explained by a representative of UN Women Sweden: “Otherwise the strong UN Women’s National Committees would explode. So I think they are trying to find some kind of middle way, and some kind of explanations. But, who knows, it’s the same male power structure within the UN as in the rest of the society” (interview UN Women Sweden).



## Affiliation to Meta-Organizations

As the example above shows, when interactions between organizations at the supranational level take place inside the meta-organizations to which they are affiliated, conflicting frames and identities need to be handled within the organization. In these processes of organizational Europeanization, the interviews indicated three important issues to be handled in such interactions.

First, the extent to which the policy issue is central for the organizations' identities plays an important role. For UN Women Sweden and the SWL the issue was in fact central. UN Women Sweden had even come into conflict with its meta-organization on the framing of prostitution as sex work. The SWL, in turn, had pushed for and been successful in the implementation of its own framing and identity in the meta-organization of which it was member: "The European Women's Lobby has taken a stance for the Swedish model even though the German Women's Lobby disagrees. The German Women's Lobby is, however, not actively working against it. But it is the same as when the European Women's Lobby took a stance for the European directive on maternity leave. The Swedish Women's Lobby is not supporting this proposal because we want an individualized parental leave system. So we are not supporting it, but we are not working against it either. So you see we are not pursuing the issue" (interview SWL). This shows how, in a meta-organization, the member organizations sometimes have to step back on certain issues in order to not create too much internal tension.

In the cases of RFSU and RFSL, prostitution has not been a central issue for their meta-organizations which has made RFSU's position, which is considered too positive toward the Swedish model, unproblematic for the meta-organization. There was, however, a tendency in the IPPF to start addressing the prostitution issue and to find a common stance, according to the representative (interview RFSU), which might in fact force RFSU to take a clearer position for or against the Swedish model. Rose Alliance seems to share its meta-organization's overall frame and identity.

Second, the interaction depends on how the domestic organizations are affiliated with international or European meta-organizations and the kinds of relationships that such membership implies. UN Women Sweden is organized like a chapter of its meta-organization and is thus in need of coordinating its frames and identity. The tension between the supranational and the national level cannot be ignored and needs to be addressed in one way or another. UN Women Sweden might have to reconsider its affiliation if the distance between the two organizations becomes too wide. The SWL has not been so concerned by the fact that some members of the EWL have

been critical of the Swedish law because their own position seems to be dominating in the meta-organization and thus not challenged.

The third issue relates to the position of the affiliated members in the meta-organization. All members do not have the same status in the meta-organization, and all interviewees expressed that they perceived having a strong position in the meta-organization. Most importantly, they described that they are autonomous and have the possibility to act on their own. This was reported to be especially true for RFSU, which can, according to the representative, act together with IPPF but can also decide to act on its own. This position seemingly does not require RFSU to coordinate its framing of the prostitution issue and its identity with IPPF.

## Conclusions

Interacting with organizations at the European and international levels can provide both opportunities and challenges for Swedish CSOs. Challenges are particularly evident in a polarized policy field such as prostitution/sex work in which different framings and identities can clash and lead to conflicts. Some organizations can perceive the supranational level as liberating, while perceiving the domestic level as oppressive. These organizations might choose strategies that reduce conflicts at the national level. Other organizations that perceive the supranational levels as more hostile might instead try to export their frames and identities abroad. This study suggests that it is easier to preserve frames and identities that are dominant at the domestic level and at odds with the supranational level when one is interacting in these contexts. The opposite situation—in other words, upholding frames and identities that find support abroad when interacting at the domestic level where these are more at odds with the general political culture—seems to be more difficult.

Meta-organizations can provide a more safe and predictable environment for interaction where some of the potential clashes and conflicts can be handled within formalized democratic procedures. This does, however, raise issues of adaptation due to the high level of homogeneity required by the meta-organization to uphold at least some common ground when it comes to framing and identity.

We argue that the Swedish prostitution policy model is the product of both the traditional Swedish way of handling social issues and the women's movement's effort to frame the issue from a specific gender perspective. The study shows that, through organizational Europeanization, new frames and identities are imported in the domestic field (identity Europeanization) and that this can spark adaptation but also conflicts. These processes create

opportunities both for questioning the Swedish prostitution policy model at home and for exporting it abroad.

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## Note

1. A frame is a cultural and cognitive system or scheme of interpretations that organizes and structures individuals' and groups' experiences and defines the significance of the events that are within the frame and hence guides actions (Goffman 1974).

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