

## 9 Branding the Nordic model of prostitution policy

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### Introduction

By the late 1960s, a dominant Western imaginary of the Nordic nations was a paradise of sexual freedom and liberation (Arnberg and Marklund, 2016). Pornography was decriminalized in Denmark in 1969 and Sweden in 1972 (Kulick and Rydström, 2015), and already in the 1950s, Sweden attracted international attention for its introduction of sex education for seven-year-old children and production of films with explicit sexual content (Kulick, 2005). Shocking to some, progressive to others, these legal and social developments cemented the reputation of the Nordic region, and Sweden in particular, as the home of sexual liberalism. This liberal image was further strengthened by the Nordic model of ‘penal exceptionalism’ (Pratt, 2008; Ugelvik and Dullum, 2012). Gaining prominence from the late 1960s (Nilsson, 2012), the Nordics gained an image for less punitive approaches to crime, especially through shorter prison terms and a focus on offender rehabilitation.

A half-century later, this reputation of the Nordics has been replaced by a different and rather less liberal sexual imaginary, an image that also carries Swedish origins. Since the 1990s, Sweden has been committed to widening the net of criminal justice by broadening which acts are criminalized as sexual offences as well as increasing the level of punishment for such crimes (Skilbrei and Holmström, 2013). A key example of this shift in the legal and social approach to sexuality is the 1999 unilateral criminalization of the purchase of sex. This came to be known first as ‘Swedish model’ and later as ‘Nordic model’ of prostitution policy. Adopted in several countries (see Table 9.1), endorsed by the EU Parliament, and promoted as a progressive politics of gender equality, this model emerged as one of the regions’ primary policy exports.

This chapter asks three questions about the circulation of Nordic prostitution regulation. The first is descriptive: How did the model emerge and circulate, and which actors were responsible for its circulation? The second is analytical: What was the content of the model, and how was it understood throughout the world? The third is explanatory: Why was the

Table 9.1 Adoption of the ‘Nordic model’

<i>Country</i>	<i>Law came into effect</i>
Sweden	1999
Norway	2009
Iceland	2009
Canada	2014
Northern Ireland	2015
France	2016
Ireland	2017
Israel	2020

circulation of the model so successful, both in shaping discourse and policy reform? In analysing this circulation, we introduce branding theory to circulation studies. We argue that policy mobility and diffusion can be deeply affected by *background* nation brands (which shore up or diminish legitimacy) and *foregrounded* actor strategies that seek to brand a policy in a competitive ideational environment. In our case, the two branding dimensions were also symbiotic. Sweden, in particular, both drew on and sought to strengthen its nation brand in promoting the criminalization of the purchase of sex.

The chapter proceeds as follows. In the next section, we show the remarkable spread of prostitution regulation as ‘a’ or ‘the’ Nordic model in the period 2012–2017 through a media content analysis. This is followed by a presentation of our theoretical framework and examination of the domestic emergence of the policy, its characteristics under export, and import. We conclude by discussing the causes of the policy’s success.

### **The emergence of a new Nordic model**

In order to understand the potential spread of prostitution regulation as Nordic model, we conducted first a global media content analysis. Using the media search engine m360, we identified 2,229 news media articles for the simple search term ‘Nordic model’ in English between 1 September 2012 and 1 September 2017. Given that international attention is directed at several Nordic models, this approach allowed us to place prostitution policy in a relevant discursive universe.

Figure 9.1 shows the distribution and source of those articles across different regions of the world – principally online news, newspaper articles and TV media websites. Given the search was in English, the apportionment hues unsurprisingly closely to the distribution of English-speaking countries (especially in North America and Asia) although there is large coverage in Western Europe. Even at this level, we can see the presence of prostitution regulation in media coverage of the Nordic model. Diffusion is especially high in Australia, which reflects how ‘the Nordic model’ of prostitution has been a key reference in ongoing debates on prostitution policies there (see O’Brien, 2017).

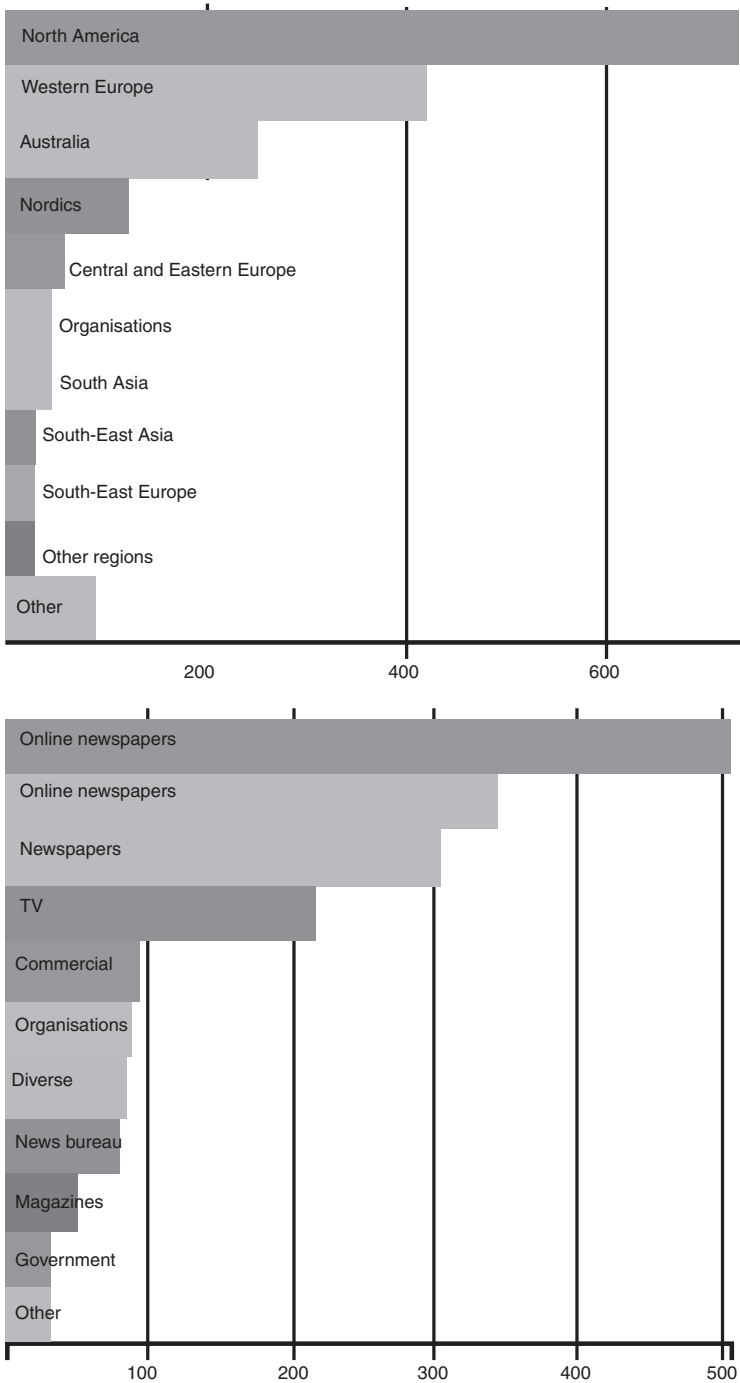


Figure 9.1 Distribution and source of English-speaking articles 2012–2017.

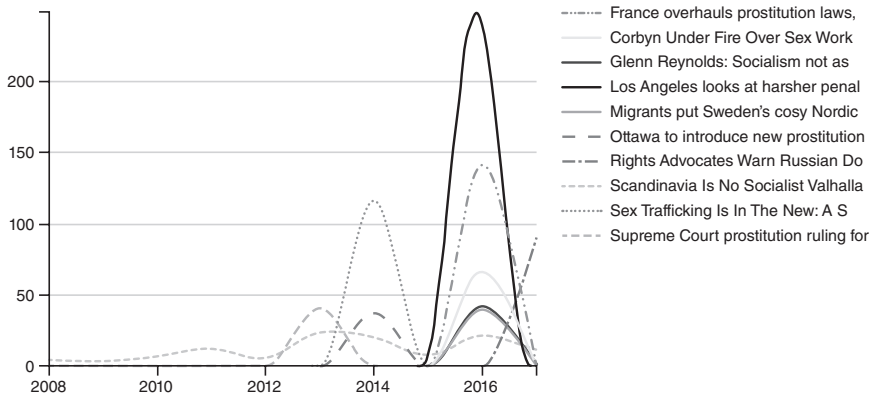


Figure 9.2 Top ten news stories.

Figure 9.2 shows the top ten news stories – i.e., where the same news event is covered by different media channels. The discussion of the Nordic model of prostitution features prominently, with three of the top ten stories. Coverage of France’s adoption of the Nordic model of prostitution policy generated by far the most attention, with 151 unique articles, while the political debate in Western Australia for reform of the prostitution laws being the seventh most covered event. The remainder of the top ten stories deals, respectively, with the economic dimensions of the social welfare model, migrants, gender equality, domestic violence and architecture.

Using Nvivo, we generated also a word cloud of the most common words in the 2229 articles referring to the ‘Nordic’ and ‘model’. Again, the content reveals a strong, if not very strong, focus on prostitution-related themes. Of the five most common words (excluding the Nordic model), two relate explicitly to the coverage of prostitution (‘sex’ and ‘prostitution’) and one partly (women). Drilling down further on the word usage, it is notable that some words that might appear to relate to the traditional social welfare model, concern prostitution. Thus, 59% of the 1,391 articles that contained ‘worker’ or ‘work’ refer also to ‘prostitution’, ‘prostitute’, ‘sex’ and/or ‘sex worker’ (Figure 9.3).<sup>1</sup>

To avoid an English bias, we conducted a survey of French-speaking media. In the period 2012–2017, the phrase Nordic, model featured 284 times in this database. We discovered, however, frequent usage of the ‘Scandinavian model’, and using this as a search term, we identified a further 596 articles. Figure 9.4 provides a word cloud image of the most frequently discovered words for both. Again, prostitution features highly in articles on the Nordic model as well as the ‘Scandinavian model’, with references to ‘prostitution’, ‘clients’, ‘prostituées’ and ‘femmes’ (women). As can be seen, ‘prostitution’ and ‘women’ are the fifth and sixth most common terms after ‘model’,





Figure 9.4 French news articles: 1 September 2012–1 September 2017.

welfare state is ‘Scandinavia’s best brand’, it is less clear that this is always so. Alternatively, prostitution regulation can be viewed as the new Nordic welfare brand. The Nordic model of prostitution has, at least in name, a welfare dimension and, more importantly, draws heavily on the symbolic resources of the welfare state and gender equality in securing legitimacy.

In any case, prostitution regulation challenges the idea that one can distinguish easily between ‘general’ and ‘specific’ Nordic models.<sup>2</sup> Arguably, as we shall see in this chapter, the traditional welfare model and prostitution model have a co-constitutive relationship in circulation. The welfare model strengthens and shores up the Nordic brand for prostitution policy and provides some of its content, while the prostitution model represents a new advertisement for the traditional welfare model – presenting new ways in which welfarism has tackled apparently social problems, including criminal activity and gender inequality.

### Theoretical framework

‘Nordic models’ can be understood as a cultural expression of place that provides valuable symbolic resources (Langford and Larsen, 2018). They constitute an ‘imaginary’ in which a society, as Castoriadis (1975: 465) puts it, ‘creates for each historical period its singular way of living, seeing and making its own existence’. Thus, Nordic models (and exceptionalisms) can be understood and studied as a construction – a collection of discourses, ideas, images and symbols that may (or may not) correspond with ‘reality’ and form part of a broader ‘Nordicity’ (Browning, 2007).

In this chapter, we use two specific constructivist frameworks to analyse the Nordic model of prostitution regulation. The first are standard theories of diffusion and circulation, and specifically that of *policy mobilities*. Diffusion studies vary in their approach – between a focus on the ‘spread’ of conceptual objects (ideas, rules, institutions and practices); their ‘transfer’ with a focus on the actors, processes, local adaption and parallel process; and the process of ‘construction’ and ‘mediation’ of the objects throughout the entire process (Djelic, 2008: 546–552). While we are interested in the spread of the prostitution regulation, we are especially interested in transfer and dynamic construction. This involves close attention to the strategic actions of actors and an understanding that diffusion is primarily a ‘historical and conceptual act’ rather than a ‘linguistic act’ – conceptual change occurs in the very act of translation (Palonen, 1998).

In this respect, ‘policy mobilities’ literature in diffusion studies is of particular value. The term ‘policy mobilities’ originates in geography but has been integrated in critical policy studies (Peck and Theodore, 2010; McCann and Ward, 2013). It is intended to move beyond conceiving policy as something that is rationally communicated, transferred and applied, hence allowing it to encompass its more symbolic and disorderly sides (Newburn et al., 2017). Like much diffusion literature, policy mobilities literature



sees the movement of constructs as neither linear nor uniform across time and space (McKenzie et al., 2019). It is concerned specifically with the movement of policy, which makes it highly applicable for studying prostitution regulation.

As Newburn et al. (2017) highlight, the concept of policy mobilities carries the concept of ‘policy assemblage’ by pointing to the process of ‘temporarily bringing something – such as a policy – into coherence’ (McKenzie et al., 2019: 4). A similar point is made by Peck and Theodore (2010) when they describe one of the characteristics of policy mobilities is the process of synthesizing policy. Thus, the policy is a social process. In this respect, Jones and Newburn (2007: 23) helpfully differentiate among these diverse elements, or levels, of policy: (1) ‘ideas, symbols and rhetoric’; (2) ‘the more concrete manifestations of policy in terms of policy content and instruments’ and (3) ‘the more practical applications of policy in terms of its implementation by practitioners and professionals’. As we shall argue, the policy package of the Nordic model of prostitution regulation travels with these three different aspects – but is dominated by the first: ideas, symbols, and rhetoric.

In analysing this circulation, we introduce branding perspectives to circulation studies, drawing on both marketing theory and critical branding studies. In our view, branding is relevant to the study of circulation in at least two respects. First, a nation’s brand can be used to strengthen or weaken the legitimacy of a circulating policy. A ‘brand’ is a name or image that identifies and differentiates a product from other products, and a ‘nation brand’ consists of ‘the unique multidimensional blend of elements that provide the nation with culturally grounded differentiation and relevance for all its target audience’ (Dinnie, 2008: 15). Nation brands exist regardless of a state’s or others’ efforts. Aronczyk (2008: 49) observes that nations are ‘already de facto brands, regularly projecting their assets, attributes and liabilities to a public at large’.

During the 1990s, nation branding emerged as an explicit phenomenon. As part of the turn to the ‘competition state’, Nordic states joined the global movement of ‘nation branding’ and, supported by an extensive ‘nation branding industry’, competed to promote and manage their image and ideas for commercial and political goals (Byrkjeflot et al., 2013; Neumann and de Carvalho, 2014; Angell and Mordhorst, 2015; Strang, 2016). Whatever the origins, the main point from an analytical perspective is that a country or regional brand, such as ‘the Nordic’, is a background presence in circulation and, crucially, is more than a mere shorthand for describing the origin of an idea, policy or material product. A nation brand provides also a symbolic resource or liability. Thus, an economic or regulatory model might be more or less attractive on the basis that it is ‘American’ or ‘European’, a football strategy because it is characterized as ‘Brazilian’ or ‘German’ or furniture design because it is sold as ‘Danish’ or ‘Japanese’ (on Denmark, see Chapter 13 by Mads Mordhorst). Whether the particular idea or object is actually from the nation is less relevant – the use of the nation



or region as an adjective brings to bear cognitive, emotional and subliminal associations. In practice, they can become 'sub-brands' of the nation brand.

Thus, treating brands analytically means using the analytical resources embedded in the idea and discipline of (critical) marketing to understand contemporary and historical social discourses and realities. Indeed, the Nordic region is an ideal place for investigating the idea of branding as an analytical category. The Nordics already have a powerful general brand (Browning, 2007; Marklund and Petersen, 2013; Marklund, 2017) – the Nordics have been described as 'moral superpowers' (Dahl, 2006), 'agents of a world common good' (Bergman, 2007), 'havens of gender equality' (UN-CEDAW, 2003) or the 'referent' for welfare states (Esping-Andersen, 1990). The labels in the region (Nordic, Scandinavian and five individual country names) constitute a form of brand capital and appear to lend significant discursive and aesthetic power to almost any imaginable political, social or commercial project. Indeed, the model of 'New Nordic Cuisine' seems to draw heavily on the legitimacy of the Nordic label given its rather dubious roots in the Nordic region (on Nordic cuisine, see Chapter 12 by Silviya Svejenova et al). As we shall see in the case of the Nordic prostitution model, it is arguable that the label has been helpful in overcoming its elements that are not consistent with standard progressive images of the region.

Second, the act of circulating can constitute branding. Browning (2007) defines branding analytically as strategic action that seeks to promote a stable and specific idea with a particular audience in mind. In other words, there is some form of strategic commodification that is reductionist in its message. The use of commercial frameworks as analytical constructs in diffusion studies is not necessarily new. Many authors refer to the 'packaging' of concepts for the purposes of circulation (Mitroff and Mohrman, 1987: 69; Czarniawaska and Jorges, 1996; Rottenburg, 1996: 216; Djelic, 2008: 546–550). In seeking to understand the fashionability of management techniques, Abrahamson (1996: 125) goes further and refers to the cultural industry's marketing strategies: selecting a limited set of art and artists, packaging and launching them and co-opting mass media process – a process of supply-driven rather than demand-driven innovation. This corresponds to many key elements in branding. In the case of the Nordics, Browning (2007) claims that the mobilization of Nordic identity in foreign policy during the Cold War was an exercise in branding. Drawing on Waever (1992), he argues that the Nordics sought to demonstrate superiority to a divided and militarized continental Europe through a rhetoric and foreign policy based on peace, humanitarianism and solidarity.

In the context of circulation theory, we can think of branding as a specific form of diffusion. In a competitive ideational environment, actors may draw on branding tools in order to attain more visibility or support for their particular 'product'. This might include strong differentiation, greater simplification, mythologizing or the use of different aesthetics and labels

in promotion. A historical example in the case of the Nordics is universal suffrage. As Larsen (2021) points out, American suffragists decided to promote the Norwegian introduction of women's right to vote in 1913 as the first in the world, rather than the earlier and identical reforms in Finland, New Zealand and Australia. Norway provided a better ideational product since there were fewer doubts over its sovereignty – the other three were still disentangling their foreign policies from earlier colonizers despite being independent states.

In the case of prostitution, it is highly polarized and contested. The principal competitors are: (1) a Dutch model of full legalization and regulation; (2) a traditional model of full criminalization; and (3) a spectrum of approaches in-between. In this context, traditional political movements – whether feminism, conservatism, social democracy, human rights – have been often split on the best approach. As we shall argue, a strategy that created a distinct model in this policy jungle that could draw support from both progressive and conservative political forces would be attractive.

### **The emergence and content of the Nordic model of prostitution policy**

What has come to be viewed as the Nordic prostitution model first emerged in Sweden and was later adopted and adapted by three other Nordic states. Throughout most of the twentieth century, prostitution in Sweden was considered formally a *public health* challenge. After the deregulation of the municipal prostitution law in 1919, the principal form of regulation was the *Lex Veneris* of 1918, legislation designed to stop the spread of venereal disease (Svanström, 2006: 145–146). This was complemented by a latent moral approach, whereby the vagrancy law – with the support of various vagrancy commissions – was frequently invoked to arrest sex workers and declare their earnings as illegal (Svanström, 2006: 146). However, opinion began to shift from the late 1950s as, and certainly by the 1980s Prostitution was framed as a *social problem* (Holmström and Skilbrei, 2017). This reformulation of the problem of prostitution entailed the establishment of targeted social services, but also new criminal justice responses were debated. Two white papers and a series of law proposals throughout the 1980s and 1990s suggested re-introducing criminalization of both the seller and the buyer of sex or to only criminalize the buyer.

Eventually, on 1 January 1999 as part of a larger law package on 'women's peace', legislation criminalizing the purchase of sex entered into force. The law's origins stemmed partly from a further evolution in views of prostitution. Prostitution was no longer only defined as a social problem that society should tackle with social measures, it was also defined as a result of and as something that contributed to *gender inequality*. With this came an understanding of prostitution as linked to power relations, both in structural

and individual terms, and this is key to understanding the movement towards criminalizing ‘the demand side,’ the party deemed most powerful and blameworthy (Holmström and Skilbrei, 2017).

The new Swedish law gained significant attention internationally and constituted a contrast to how several other European countries at the same time decriminalized or regularized prostitution. The Netherlands marched decisively in the opposite direction of decriminalization and normalization with its 2000 law revision (see, e.g., Outshoorn, 2011). In this respect, the law was intended to prevent a similar development in Sweden but provide also a reference and beacon for debates elsewhere. Indeed, one of the government's explicit goals was to set an example to be followed by other countries (Prop. 1997/1998: 55), a key feature to which we shall return.

In addition, three other Nordic states largely followed suit. In 2009, Norway and Iceland criminalized the purchase of sex, reflecting both the trajectories of national discourses and the argument that to ‘follow Sweden’ would improve their ability to combat both prostitution and human trafficking.<sup>3</sup> In the meantime, in 2006, Finland introduced a partial criminalization of the purchase of sex, only criminalizing instances of buying sex from victims of human trafficking or from sex sellers who are ‘the subjects of pimps’. The one Nordic country that has not introduced a partial or universal ban against the purchase of sex is Denmark. Despite proposals to introduce comparable legislation in the same period, the debate quietened after a criminal law reform committee weighed against its adoption.

With four out of five Nordic countries introducing new legislation that, to varying degrees, represented an abolitionist approach towards prostitution, defining it as a social ill that should actively be combatted, the ‘Swedish model’ was increasingly referred to as the ‘Nordic model’. However, as McMenzie, Cook and Laing (2019) rightfully argue, Sweden continues to serve as the main example of this approach – the invocation of Nordic is as much a label as a policy description. As the legislation in the different Nordic countries emerged from different debates and was implemented differently, the shift in terminology from ‘the Swedish’ to ‘the Nordic’ model is more a political or instrumental move than one grounded empirically in actual policies.

This ‘Nordic prostitution model’ can be understood as containing three constitutive elements: criminalization of sex purchase, decriminalization of sex sale, and welfare support. These elements are best understood as ‘ideas, symbols and rhetoric’ (Jones and Newburn, 2007), rather than concrete policies. First, what is often considered core to the Nordic model in these and other debates is a simple and particular piece of legislation: The Sex Purchase Act, a law criminalizing the purchase of sex. Second, the simultaneous decriminalization of the sale of sex is presented (sometimes) as part of the model and often framed in the language of human rights and gender equality. In 2014, when the European Parliament voted for a resolution advising EU member states to both decriminalize the sale of sex and

criminalize the purchase of sex, ‘the Nordic model’ was defined as a model that ‘views prostitution as a violation of human rights and as a form of violence against women and criminalizes those who buy sex rather than those who sell it’ (European Parliament, 2014b). Third, the model is often linked to a particular mode of social work, in which the law is meant to be part of a broader package of reforms that promote exit from prostitution for sellers. These three elements are neatly summed up by Corinne Isler and Marjut Jyrkinen (2018: 1):

This model includes the criminalization of buying sex and pimping, the decriminalization of selling sex and the offering of exit services to people who wish to leave prostitution.

Moreover, over time, an additional communicative element has been added: that there is empirical evidence from the Nordic region which demonstrates that the model is equipped to abolish prostitution (and address human trafficking and unequal gender relations in the process).

To be sure, the point of this chapter is not to interrogate the actual existence of any model, and we shall investigate a plurality of representations in selected contexts. Mobility and language create space for evolution, while the strategic nature of much of its circulation means that both the exporters and importers of this Nordic brand will be the co-creators of its content and meaning, what in the policy mobilities literature is called ‘mutation’ (Peck and Theodore, 2010). Nonetheless, we can identify several paradoxes associated with the standard and stylized account of the Nordic model, as encapsulated in the summary of the European Parliament decision.

First, decriminalization of the sale of sex was not part of the legislative changes in the Nordic region. In Sweden, the sale of sex was decriminalized in 1918 and in Norway in 1902 as part of sweeping changes to the criminal code. In Iceland, the act of selling sex was decriminalized two years before the introduction of the Icelandic Sex Purchase Act, but these legislative changes were not directly connected (Skilbrei and Holmström, 2013). The framing of the Nordic model as a clearly defined and delimited policy reform package, including decriminalization, requires thus a stretch of the historical imagination. In the context of the region, it was primarily a move to criminalize.

Second, it may appear self-evident that countries such as Sweden and Norway would criminalize the purchase of sex based on the fact that prostitution was a form of sexualized violence and that it contravened human rights. However, this discourse was largely absent from the debate. Sweden criminalized the purchase of sex in 1999, well before the human rights discourse was integrated into Swedish policymaking. Moreover, the promoters of the Swedish Sex Purchase Act have protested later claims that they did so based on an understanding of prostitution as a form of violence (for ambiguities on the link between prostitution and violence in debates, see Östergren, 2017).

In Norway, in the political debates leading up to the 2009 criminalization, prostitution was typically spoken of as a form of gendered violence, but human rights were not a central concern. Rather, the application of human rights' arguments is typical for those who critique the Nordic model, such as central organizations in the sex workers' rights movement and Amnesty International.<sup>4</sup> Indeed, experimental work by Langford (2016) shows how exposure to such human rights arguments among the Norwegian public can trigger a significant decrease in support for the Sex Purchase Act in Norway. Indeed, there were several strands of debates that impacted the outcome of the vote in the Norwegian parliament: while gender equality was one of these, an equally strong motivation was the growing fears over trafficking and the impact of foreign sex sellers on public space and society (Skilbrei, 2012).

Third, the availability and quality of welfare services for sex workers has varied dramatically across the Nordic countries and over time. Although the introduction of the Sex Purchase Act was intended to be followed by an increase in investments in services for sex sellers, the Swedish government never fulfilled its promise here. As Florin (2012: 276) states: 'The government has done nothing to change this framework and little to guide or fund targeted service provision'. Welfare services for sex workers continue to be weak in Sweden, in direct contrast to claims made in the European Parliament. This was not the only aspect of implementation that has been little communicated internationally.

Finally, as noted, a key claim for advocates of 'the Nordic model' is that it has reduced the extent of prostitution and, sometimes, human trafficking. This claim was, for example, central in debates about the introduction of a ban against the purchase of sex in Northern Ireland (McMenzie et al., 2019) and France (Kingston and Thomas, 2019). Although the number of female streetwalkers seemed to decline in the period after the introduction of the 1999 Swedish Sex Purchase Act, later counts and estimates and research on online prostitution platforms provide little support for this claim (see the review of the evidence in Holmström and Skilbrei, 2017). Instead, evidence on the extent of prostitution is clearly a function of research design. For example, when Gunilla Ekberg (2004), human trafficking adviser to the Swedish government, concluded in 2004 that the Swedish Sex Purchase Act reduced successfully the size of the market, she relied on the number of women counted as active in street prostitution in the business hours of municipal-run social services in the three largest cities, despite the considerable shift in the market at this time to indoor and online prostitution throughout Europe (Sanders et al., 2017).

Thus, although there is a great willingness to refer to the regulation of sex services in the Nordic region as a 'model', its actuality is significantly more complex in practice. While it is often represented to contain three core elements – criminalization of the purchase of sex, decriminalization of the sale of sex and enhanced support for sellers – all these three elements are not

present in any of the Nordic countries. Moreover, the claim that the criminalization of the purchase of sex has resulted in a significant reduction in the prostitution market is not well documented (Holmström and Skilbrei, 2017). Thus, from a policy mobilities perspective, the Nordic prostitution model is perhaps more ‘ideas, symbols and rhetoric’ than a ‘concrete’ policy or ‘practical’ application. In addition, its construction contains many typical elements of branding – a simplification that bears a resemblance to a product but without a level of ‘slippage’ that makes it appear inauthentic. Yet, given that the Nordic model is still presented as a fact, also by the European Parliament, this provides the background for our exploration below of the powerful circulation of the idea of what this Nordic model is and can achieve.

### **Exporting the Nordic model**

We turn now to the question of how this Nordic model received so much attention – in particular, what was the process of ‘transfer’ in Djelic’s (2008) framework: How did a model become so heavily referenced in policy debates in countries that otherwise differ radically from the Nordic states in their governance, ideology and traditional regulation of prostitution markets? In this respect, the strategic behaviour of two actors (state and non-state) is critical.

The success in the circulation of the Nordic model can be attributed first to the active engagement of the Swedish government and much later to the Norwegian government. The legislation was clearly adopted with the objective of circulation, policy mobility: It was a model to be used by politicians and activists in other countries (Government of Sweden, 2010: 29). Although the Sex Purchase Act was intended to have material effects outside of Sweden, the aim was not to simply ensure the replication of similar legislation elsewhere. Rather, the emphasis was on triggering a cultural shift by producing different kinds of conversations about prostitution. For example, in the parliamentary debates in 1998 on the legislation, the Swedish Minister of Social Affairs, Lars Engqvist stated the following:

Sweden is a pioneer in this area and when we now have taken these steps [by criminalising the purchase of sex] we will be able to contribute to changing debates also in Europe.

Likewise, the formal proposal for the law was explicit about global intentions. In Prop. 1997/1998:55 (105), the following is stated:

The trade of sexual services has in recent decades developed into an international industry. Although the investigation made the estimate (in 1994) that prostitution in Sweden is small compared to other European countries, according to various data from, e.g., the prostitution services, there are signs that this so-called international sex industry is also increasing in Sweden. That Sweden is taking this step is therefore



an important sign to other countries which displays our attitude on this issue. The law can also be a support for the groups in different countries trying to counteract prostitution.

This export ambition was followed up with concrete efforts by the Swedish government to ensure the circulation of knowledge about the law and, not least, the specific concerns about prostitution it was designed to address. Indeed, examining debates on its introduction, possible problems with implementing the law were viewed as less important than the prospect of it sending the intended signal at home and abroad (on patterns of implementation, see Olsson, 2021). Therefore, the export was not necessarily material (the legislation) but symbolic (the sentiments and ideology that lay behind it). This foregrounding of expressivism had great consequences for how later critiques of the lack of implementation and possible negative effects for people who sell sex were received – they had little effect on the symbolic objectives of the law and could be dismissed without too great difficulty. The message to be conveyed by the criminalization of the purchase of sex was that it was an act of structural and individual gendered power that men generally, and sex buyers specifically, have over women. The law established that buying sex is abnormal in any country seeking gender equality (Kulick, 2005). With this, the Sex Purchase Act was firmly placed as a tool for and the expression of gender equality, an understanding that had been forged for several decades (Erikson, 2018).

Thus, governmental efforts were made to spread information about the Sex Purchase Act and the rationale behind it by organizing events in Sweden and abroad. Much of this was funded by the Swedish Ministry of Foreign Affairs and organized via the Swedish Institute, which has a mandate to promote ‘interest and trust in Sweden around the world’.<sup>5</sup> It involved a clear package if not a full-scale branding strategy. The film *Lilya 4-ever*,<sup>6</sup> directed by Swedish filmmaker Lukas Moodysson, was screened throughout the world in cooperation with Swedish embassies and consulates with the explicit intention of spreading knowledge on trafficking (Regeringskansliet, 2003). In addition to showing the film, this project also included seminars with representatives from the Swedish government (many of high rank), Swedish non-governmental organizations (NGOs), prostitution scholars, and women who had exited prostitution; organised often by representatives of local NGOs. In 2003, in Eastern and Central Europe alone, the film was shown as ‘a part of this campaign’ 125 times (The Swedish Institute, 2004).<sup>7</sup> Together, these actors debated trafficking and prostitution and which policies should be applied to combat both phenomena.

The efforts of the Swedish government soon attracted the attention of the *Economist*. In 2004, they noted both a new Swedish phenomenon and a pitched global policy battle:

Not content with having won over domestic consumers, the Swedish government is self-consciously engaged in a battle for Europe, with the



libertarian Dutch on the other side. It even has a roadshow, which begins with a showing the film 'Lilya 4-ever', about a trafficked Romanian teenager, and proceeds with speeches from ministers, police inspectors and reformed prostitutes. Peculiarly for a nation with such firm socialist traditions, the government has also teamed up with the White House to fund anti-prostitution campaigns in Europe.

(Economist, 2004)

The Sex Purchase Act was a powerful vehicle and attracted attention in very diverse contexts, as intended. Asked by a political opponent in the Swedish Parliament about whether Sweden was doing enough to promote the Sex Purchase Act, the then minister for foreign affairs, Carl Bildt, stated (Swedish Parliament, 2007, our translation) the following:

Sweden's Sex Purchase Act is seen as a role model for many other countries. It has made an impact internationally in terms of its normative and preventive effects and its potential for promoting attitudinal changes. Even though many countries are hesitant about the usefulness of sex purchase legislation, others reach out with questions about our experiences because they themselves are considering such legislation. ... We will continue to bring up Sweden's Sex Purchase Act in all relevant international contexts.

This stance demonstrates the continuous expectation of the promotion of both the law and its underlying norms. As parliamentarian Carina Hägg stated in the said debate (Swedish Parliament, 2007, our translation): 'Minister of Foreign Affairs Carl Bildt intends to promote the Sex Purchase Act within the EU and internationally, not least in the UN'.

However, the Swedish (and later Norwegian) governments were not alone in their export efforts. Although the former invested significantly in communicating both the law and its benefits for gender equality, it would be mistaken to see its rapid diffusion (and partial uptake) as the mere result of a successful government campaign. The second central actor was international feminist lobby organizations, which quickly took the cue and used the case of Sweden to further their argument that prostitution should be abolished. Here, the stylized Swedish model commenced its evolution. While many backers of the law in Sweden described prostitution as related to gendered violence, not as a form of violence in and of itself, feminists elsewhere applied this definition very forcefully. Although, this depiction was more easily assimilated in the later Nordic model as prostitution was portrayed as a form of gender violence in the Norwegian debate (Skilbrei, 2012).

The success of international feminist lobby organizations in amplifying circulation, especially in various supranational forums, is interesting in its own accord. Although we are unable to yet identify to what extent the switch of the label from 'Swedish' to 'Nordic' was a strategic move by

feminist organizations, they were one of the first to deploy the term.<sup>8</sup> These organizations were well established and highly influential in global policy-making spaces (Houge et al., 2015) and, for institutions such as the EU, represent grassroots interests and are a key part of the European democratic system (Börzel and Risse, 2007). Organizations working on gender and equality issues have been especially good at manoeuvring within this global landscape, using regional and global platforms, such as the EU and the UN, to strengthen and promote their policy demands (Outshoorn et al., 2012).

Such international civil society actors were active in their efforts to disseminate ‘the Nordic’ way of approaching prostitution, both in its normative and legislative form, not least by organizing campaigns and developing argumentation points and manuals. One example of the last technique is that the Australia division of the Coalition Against Trafficking in Women (CATW) has made a Nordic model resource page with arguments and infographics that can be used in debates.<sup>9</sup> Another is websites such as [nordic-modelnow.org](http://nordic-modelnow.org), which describe and promote ‘the Nordic Model’.

The European Women’s Lobby is perhaps the most significant transnational agent among these groups.<sup>10</sup> The following is an example from a web item on an event in Brussels that forms part of the expanding ‘road show:’

On Monday 8 December [2014], more than 120 persons reached out to the welcoming meeting room of the Mission of Norway to the EU, to discuss the Nordic model as an inspiration for the realisation of gender equality.

This event, co-organised by the European Women’s Lobby (EWL) and the Norway Mission, came 3 months after the evaluation of the Norwegian law on prostitution, and aimed at feeding into the European discussion on women’s rights, at the eve of the 20 years of the Beijing Platform for Action, by assessing the impact of the Nordic approach on gender equality. It came at a strategic time to also take stock of current legislative developments towards the Nordic model in other EU countries (Ireland, Northern Ireland, Canada) and the growing abolitionist movement calling for a Europe free from prostitution, including in countries which have normalise [sic] prostitution as ‘work’. (...) What is called the ‘Nordic model’ when it comes to violence and prostitution, is based on key values: equality, protection, considering prostitution as harmful to women and society in general, refusing gender stereotypes and the trade of the human body and sexuality.

Thus, the export of the Nordic model of prostitution regulation was driven heavily by coordinated campaigns from both the originating states and interested transnational actors. As shown below, the countries that were the most receptive to the model were within the orbit of these campaigns – especially European countries and local networks of feminist organizations with strong transnational connections. However, the importing

actors – to which we now turn - were more varied, and there are some interesting country-level exceptions.

### Importing the Nordic model

The import of the Swedish – and then the Nordic – model into domestic debates and law is a dizzying example of policy mobility. As mentioned above, in 2014, the European Parliament voted for a resolution advising EU member states to both decriminalize the sale of sex and criminalize the purchase of sex based on the Nordic model. In 2016, France adopted legislation to introduce the Nordic model, criminalizing the buying of sexual services and providing legal and financial aid to those exploited in the sex industry, generating significant international attention in the process. The Nordic model has also now been adopted in Canada (2014), Northern Ireland (2015), Ireland (2017) and Israel (2020), has been discussed in Luxembourg, Italy and even the Netherlands, and is at the forefront of various campaigns in other countries, often under the slogan ‘Go Nordic’, exemplified with the following Scandi knit visual on the Facebook page of the Australian section of the CATW (Figure 9.5).

Yet, although it may look like the Nordic model has *led to* shifts in policies elsewhere, the frameworks of policy mobilities and branding caution against thinking in this way, instead drawing our attention to what kind of instrumental and symbolic asset references to ‘the Nordic’ may produce in national policy debates on prostitution. In international debates on prostitution policies, the idea of the Nordic model is articulated with great confidence. Political parties and NGOs announce whether they are for or against the Nordic model; few question its existence. Examples include the policy



Figure 9.5 Facebook homepage for coalition against trafficking in women Australia. Source: Screenshot from Facebook page: <https://www.facebook.com/catwaustralia/>

process leading up to a European Parliament resolution, where the report from the Committee on Women's Rights and Gender Equality, the so-called Honeyball report, states that the most effective way of combating the trafficking of women and under-age females for sexual exploitation and improving gender equality is the model implemented in Sweden, Iceland and Norway (the so-called Nordic model)' (European Parliament, 2014a).

Existing research has shown considerable global interest in the model. Many scholars conclude that the 'Swedish' or 'Nordic' model is among the international prostitution policies most often discussed and debated (Ward and Wylie, 2017; Crowhurst and Skilbrei, 2018; McMenzie et al., 2019). Moreover, the dominance of the 'Nordic' adjective suggests that this label may be more than a geographic and descriptive signifier model. Below we offer an analysis of how the Nordic origin of the policy, its Nordic branding, has served arguably in legitimating the policy and facilitating its mobility, by analysing two cases.

The first is the reception in Israel, which is illustrative of how the idea of a Nordic prostitution policy is both strengthened and further developed in transfer. The prospect of criminalizing the purchase of sex in Israel had been debated for over a decade, and a ministerial committee approved a bill on this issue already in 2012. Yet, due to political developments, it never went to a vote in Knesset, the Israeli parliament. In 2016, the question re-emerged after a new committee was set up to assess such a law (Newman, 2016); a bill was approved in 2018, and the law came into force in 2020.

In Israeli debates, the Nordic model was a key reference, including during the passage of the law. As discussed above, the Nordic Model is often presented as building on a framework of gender equality and human rights norms and presented as consisting of three elements: a criminalization of sex purchase, decriminalization of the sale of sex, and strengthening of welfare services for sex workers. It is further claimed to be an effective tool in abolishing prostitution, reducing human trafficking, and tackling unequal gender relations. Debates in Knesset built on the assumption that implementing 'the model' would decrease both prostitution and human trafficking (Jerusalem Post, 2018).

Yet, despite the discursive wrapping, their material import in Israel is somewhat doubtful. While the welfarist aspects were particularly highlighted, the new policies were not especially a break with long-standing development. The new law was presented in the *Jerusalem Post* (2018) as 'not only make frequenting of prostitutes a criminal offense, it seeks to help people leave sex work and find other careers'. In this respect, the introduction of a prohibition of the purchase of sex was followed by a strengthening of welfare services to sex sellers (Task Force on Human Trafficking & Prostitution, n.d.). However, while this may seem like an emulation of the Swedish approach in 1999, the Israeli policy was more a culmination of long-standing

domestic policy developments. Services for people who wanted to exit prostitution had been strengthened considerably since 2008 (Shamir, 2018), and the 2018 law could be understood as a continuation of that policy, rather than a new development.

Most strikingly, the formulation of the Israeli bill pointed to a broader approach to purchasers of sex than just a punitive one. Although not yet in place, in debates leading up to the law, the punishment was to be replaced with participating in an educational program to ‘impart knowledge and increase awareness regarding the damage caused to populations in prostitution’ (Lee, 2013). This approach has no Nordic roots but is rather similar to programs offering sensitivity training instead of punishment for people who have purchased sex. (Majic, 2014). The Israeli experience thus represents arguably the power of the Nordic brand in providing legitimacy to a complex and distinct policy assemblage that bear little semblance to the prostitution policies as they are implemented in, for example, Sweden.

A second case, Northern Ireland, provides an interesting perspective on the politics of circulation and how gender equality norms are sometimes lost in translation. McMenzie, Cook and Laing (2019) analyse how references to Sweden were crucial in the process leading up to the 2015 criminalization of the purchase of sex, included in the *Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland)*. As in Israel, selling sex was already legal, but its purchase was criminalized with this new legislation; yet the two cases diverge on the content given to the law and illustrate pointedly the politics of circulation.

The successful bid for criminalization of the purchase of sex in Northern Ireland was driven by largely conservative groups who built allegiances with feminist groups, especially in Scandinavia. Many of the latter were invited to Northern Ireland to speak on the Nordic model. In the ensuing debates, the Nordic label of progressiveness was mobilized by conservatives to introduce long-desired criminalization. The result was that the reception of the Nordic model was rather thin. The punitive aspects of ‘the Nordic model’ were highlighted and the welfarist elements were overlooked. Assistance to people who sell sex was not strengthened and the gender equality dimensions in practice received muted support.

McMenzie et al. (2019) thus conclude that the case of Northern Ireland illustrates well that what the Swedish or the Nordic model *is*: it is not fixed, but rather, it is a resource that can be drawn upon in other contexts and for domestic political purposes. Put another way, Nordicity provides a powerful brand endorsement of both a model and its domestic interpretation. In Israel, the assemblage of ‘the Nordic model’ was represented in a way that facilitated more focus on social work than has ever been the case in Sweden. Northern Ireland, on the other hand, mainly retained the criminalization and level of punishment without exporting the assumed social support element or gender equality framework. In both contexts, references to the success of ‘the Nordic model’ facilitated the approach.

### Conclusion: explaining mobility

While the Nordic model of prostitution policy represents weakly the diversity and practice that exists across and within the Nordic countries (Skilbrei and Holmström, 2013), it has spread globally and had significant traction in prostitution policy debates elsewhere. Adopted in law in many jurisdictions and promoted by the European Parliament, it has come to be a framework for global inspiration or a symbol for opposition by movements mobilizing against zero-tolerance visions for prostitution policy. As we find in our media content analysis between 2012 and 2017, it was the most discussed Nordic model, representing either a new Nordic model or a new iteration of the Nordic social welfare model.

In this chapter, we have not only sought to track the transfer of the model through analysing key exporters and diverse import contexts but also seek to explain how this model gained such prominence and was constructed and mediated in the process of circulation. One explanation is clearly the sheer volume of advocacy from Nordic governments and NGOs which has been relentless and well-resourced – analogous to a marketing or branding strategy in its focused and simplistic packaging and communication. The role of civil society organizations should not be discounted. Similar to what Tryggestad (2014) finds in relation to Norway as a norm entrepreneur in the field of gender and peace and security, the importance and legitimacy of civil society are often essential for establishing and justifying new positions.

However, that explanation is not enough. Instead, an important and qualitative explanation must be the nature of the message and the power of the background brand. In the early stages of promotion, the Swedish government actively linked a particular way of regulating prostitution with Swedish values, here with a particular focus on gender equality as a central norm in Swedish society. Later, governmental organizations and NGOs made efforts to export the Nordic model to the European Union, speaking in the EU lingo of harmonization and mainstreaming, arguing that what should be mainstreamed was the gender equality havens of the Nordic region. This is the case when, for example, the feminist lobby organization Equality Now in their factsheet on ‘The Equality Approach to Addressing Sex Trafficking’ simply states: ‘Unsurprisingly, 3 of the top 4 countries [meaning Iceland, Norway and Sweden] with the highest level of gender equality have adopted this legal approach as a way to combat sex trafficking and sexual exploitation’.<sup>11</sup>

The Nordic model of prostitution can be understood as a strategy to create a *specific* Nordic brand, drawing on the rhetorical and aesthetic power of the general Nordic brand. The circulation of this prostitution model seems to rest heavily on the legitimacy of the Nordic label, utilizing its linguistic and substantive resources.<sup>12</sup> Both gender equality and welfarism feature strongly in the Nordic brand. The principle of gender equality is a cornerstone of what is perceived as a Nordic model of welfare, and it attracts a



great deal of interest internationally. Legal strategies are central tools in how Nordic governments attempt to establish gender equality.

Efforts to promote criminalization of the purchase of sex draw heavily on these elements. As noted above, Equality Now equates the Nordic model with gender equality and the high standard of living in the region. Indeed, the switch by campaigners from the term ‘Swedish model’ to the ‘Nordic model’ more firmly placed the model in the realm of gender equality and social welfarism.<sup>13</sup>

In the case of prostitution policy circulation, researchers (Crowhurst and Skilbrei, 2018) have demonstrated that there is a particularly lively transnational exchange and a strong idea that prostitution is an area where policies would benefit from being harmonized. As demonstrated above, ‘the Nordic model’ can be put to use for securing agendas that are already present in domestic contexts but can be rebranded and legitimized as an uptake of Nordicity. Although the ideological underpinnings serve as an argument for policy change, the changes made may not actively reflect, for example, the aim of securing gender equality. The ideas inherent in the Nordic model are broad and flexible enough to allow it to be repurposed, and beyond the normative foundations that undergirded the movement in the Nordic countries to use criminal law to redirect attention and blame to clients instead of sellers. Thus, it is not the concrete instruments associated with the model alone (e.g., the criminalization of the purchase of sex) that mandates the reference to the model. As McMenzie et al. (2019) note, the debates in Northern Ireland mainly referenced the Swedish case, not the formulation of policy or experiences from countries that introduced a ban against the purchase of sex later, not even neighbouring Ireland. This strongly suggests that ‘Swedishness’ served as a symbolic resource in the debates.

Moreover, the power of the brand builds on the assumed effectiveness and coherence of the general Nordic model. The reception of the Nordic model on prostitution is rarely met with a critical analysis of its effectiveness or an understanding of the substantial differences between Nordic countries. Nordic researchers and others argue that the differences within and between the Nordic countries are too great for there to exist a Nordic model. Moreover, there is a constant debate as to the success of the model – with only modest reductions in prostitution and uncertainty over whether safety for sex workers has increased or decreased. Therefore, the term Nordic model of prostitution is perhaps best understood as a construction, and one intended to lasso certain understandings of prostitution regulation onto the Nordic brand.

## Notes

- 1 Thanks to Charlotte Aslesen for assistance with this calculation.
- 2 See discussion in the editor’s introduction.
- 3 Interestingly, although debates in, for example, Norway were ripe with references to the Swedish version of the law, the prospect of introducing a unilateral



criminalization of the purchase of sex was actually debated earlier and more forcefully in Norway than in Sweden (Skilbrei and Holmström, 2013), making the point that it is important to not confuse correlation with causation in policy scholarship.

- 4 For an analysis of how and why human rights are controversial issues in debates on prostitution, see Anne Gallagher (2001).
- 5 <https://si.se/en/about-si/our-mission/>
- 6 The title of the film when screened in Sweden was *Lilja 4-ever*.
- 7 Among other places, the film was screened in London, Paris, Vienna, St. Petersburg, Kaliningrad, Warsaw, Moscow, Budapest, Brest, Bucharest, Kiev and Sarajevo.
- 8 CATW argues (from 2009 from what we can surmise) that when Norway and Iceland introduced unilateral criminalizations of the purchase of sex, the Swedish model became the Nordic model (CATWA, 2017). Interestingly enough, CATW has in the last couple of years started to refer to it as 'the Equality Model' (see e.g. <https://catwinternational.org/our-work/advocating-for-strong-laws/>).
- 9 <https://www.catwa.org.au/nordic-model-resources/>
- 10 For examples of interventions, see: <http://www.womenlobby.org/International-Day-for-the-Elimination-of-Violence-Against-Women>
- 11 <https://www.equalitynow.org/factsheets>
- 12 A similar process has arguably occurred with New Nordic Cuisine: Byrkjeflot et al. (2013).
- 13 See <http://www.womenlobby.org/Successful-launch-of-EWL-campaign-Together-for-a-Europe-free-from-prostitution>

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