

## ***Abstract***

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**Title:** Är sex arbete? Svensk och tysk prostitutionspolitik sedan 1970-talet

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Towards the end of the twentieth century, both Germany and Sweden engaged in extensive discussions on prostitution – discussions that resulted in two very different prostitution policies. Whereas the purchase (but not the selling) of sexual favours was forbidden in Sweden, prostitution was made a legal profession in Germany. This thesis examines the political debates that preceded these legislations and analyses their ideological backgrounds.

Previously the Swedish policy of criminalizing clients has been explained with reference to the high percentage of women members in the Riksdag, compared to parliaments in countries with liberal prostitution policies such as Germany and the Netherlands. Researchers like political scientist Maud Eduards and historian Yvonne Svanström have described client criminalization as a clear feminist legislation. Comparison of Swedish and the German policies undertaken in this thesis reveals that also the approval of prostitution builds on feminist analyses, and that other explanations can be found for the Swedish approach of client criminalisation than the actual success of the Swedish women's movement. In this thesis the ideas of prostitution that emerge in tandem with the Swedish client criminalization and the German approval of prostitution are traced back to different theories of civil society, differing welfare state ideologies, religious traditions and feminist ideas that have influenced the political strategies of both countries.

Especially transnational forms of prostitution are the subject of discussions on joint legislations in the European Union. The fact that the prostitution policies of the European countries widely differ, even between parties that belong to the same political group in the European Parliament, may possibly be regarded as a problem for this collaboration. However in the present thesis the final discussion culminates with a draft for a prostitution policy that suggests a means of considering conflicting standpoints and consequently might be a way to bridge the gap between the current Swedish and German legislation.

**Keywords:** prostitution, sex work, legislation, Germany, Sweden, feminism, comparative history