



Diversity policy in employment and service provision

Case study: Copenhagen, Denmark



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Background

History of migration to Denmark

Denmark has known substantial immigration since as early as the 16th and 17th centuries, including Dutch farmers and Jews, and a continuous inflow of Germans between the mid-17th and 19th centuries. In the second half of the 19th century many workers arrived from Germany, Sweden and Poland. In 1885 foreigners made up 8% of the population of Copenhagen. The two world wars, in addition, brought many East Europeans, Jews and Germans (Hedetoft 2006, p. 2)

Notwithstanding these past experiences of immigration, Denmark did not regard itself as, and still does not want to be, an immigration country in the period after the Second World War. In the early post-war period more people emigrated from Denmark (predominantly to the new world) than settled as newcomers, and the ones that came were from Nordic and Western countries. Denmark's post-war immigration started, as with most of its neighbours, with the recruitment of 'guest workers' in the late 1960s and early 1970s. Compared with its southern neighbours, however, such recruitment was relatively late and small. Workers came mainly from Turkey, Pakistan, Yugoslavia and Morocco. At the time of the first oil crisis (and end of recruitment) in 1973 their total number was only about 15,000.

After 1973 immigration to Denmark was predominantly supply driven. Firstly refugees from Chile and Vietnam in the 1970s were followed by refugee and asylum migration from Bosnia, Iran, Iraq, Somalia, Afghanistan and Lebanon in the 1990s. Secondly, family members and later spouses of migrant workers and refugees came to Denmark in significant numbers. And thirdly, recent immigration has come from the new EU accession countries, particularly from Poland and the Baltic states, estimated at between 5,000 and 10,000 in 2006 (Hedetoft 2006, p. 2).

These inflows have led to a significant growth of the immigrant population in the country, since the beginning of the 1990s.¹ UN publications give the following key data on residents with an immigration background, based on the criterion of place of birth outside Denmark:

Table 1: *Total population and migrant stock in Denmark 1985–2005.*

	1985	1990	1995	2000	2005
Total population*	5,114	5,140	5,228	5,320	5,431
Migrant stock**	190	220	250	304	389
%	3.7	4.2	4.8	5.7	7.2
of which refugees*		33		71	65

Note: * in thousands; ** criterion: born outside the country

Source: <http://www.unpopulation.org>

The percentage of immigrants in the total population was only 3.7 % in the mid-1980s. In 20 years (by 2005) that percentage doubled: 7.2% of the total population of Denmark are immigrants (i.e. born outside Denmark).

¹ According to Statistics Denmark, the number of residents from non-Western countries increased by 520% between 1980 and 2005, forming 90% of the total increase in resident foreigners in that period.

Alternative definitions² indicate different percentages: as at 1 January 2007 the number of registered foreigners (nationality criterion³) was 278,096 (5.1% of the total population). The number of immigrants at that date amounted to 360,902, and descendants (second generation immigrants) was 116,798, totalling 477,700 or 8.8% of the total population. Of these 330,525 (6.1% of the population of Denmark) originate from a 'non-Western country'. The six largest immigrant groups – in order of size – are from Turkey, Iraq, Germany, Lebanon, Bosnia and Pakistan. Muslims from Turkey, Pakistan, Iran, Iraq, Syria, Egypt and Lebanon number around 200,000 and account for nearly half of all non-Western foreign residents in Denmark.⁴ The website of the Ministry of Refugee, Immigration and Integration Affairs sets the estimate somewhat higher at 210,000 Muslims (retrieved 17/08/07).

Stock data of Danish statistics as at 1 January 2007 indicate that the three largest cities in Denmark also have the highest percentage of 'immigrants and descendants': Copenhagen 19.8%, Århus 12.9% and Odense 12.4%, against 8.5% for the country as a whole. Non-Western immigrants and descendants in these same cities represent 13.9%, 9.6% and 9.4%.

National integration policy

As general background it is important to realise that Denmark has developed since the Second World War a universal welfare state based on high levels of public provisions in such areas as public health, education, unemployment benefits and old age pensions, accessible to all residents in the country. Policies relating to immigration and integration developed relatively late. From the mid-1980s on there were policy efforts to restrict immigration to Denmark. The Aliens Act of 1986 was devised to be able to restrict immigration and applications for asylum in Denmark. In 1992 the law regulating family reunification removed the automatic right to reunification and tightened up possibilities for entrance for this category, by, among other ways, imposing a 'breadwinner condition' for resident spouses.

In the 1990s the issue of immigration and integration developed into a controversial and politicised issue, particularly after the establishment of the Danish People's Party (DPP) in 1995 that mobilised electoral support on the immigrant issue above all others. The party also did this successfully in the electoral campaigns of 1998, 2001 and 2005. Although the DPP was never part of the government coalition, their influence on policies has been and still is great. In Hedetoft's (2006, 5) formulation: 'It is particularly the DPP, supported by the media, which managed to keep the debate alive over the past 10 years and has been successful in placing it squarely at the centre of political attention. The strong support for the DPP's articulate anti-immigrant policies has meant that, by and large, all other parties in the Danish Parliament have chosen to mobilise on this issue and have prioritised migration and integration policy area in their policy statements and legislative proposals.'⁵

² Statistics Denmark has introduced two novel sets of definitions that are frequently used: the first one is that of Dane (at least one parent is a Danish national and was born in Denmark), Immigrant (born abroad) and Descendant (child of an immigrant born in Denmark). The second is that of Western (all EU-countries plus Iceland, Norway, USA, Canada, Australia, New Zealand, Andorra, Liechtenstein, Monaco, San Marino, Switzerland and the Vatican State) versus non-Western Immigrants and Descendants (all other countries): see Ministry 2006b, 18/19.

³ Between 1995 and 2005 more than 54,000 foreigners acquired Danish citizenship (Hedetoft 2006, p. 2).

⁴ More detailed figures on flows and stocks in: Ministry 2006b.

⁵ Although few discard the substantial influence of the DPP on the immigrant question, it is also indicated that other factors have made that influence possible, and that other parties obviously have bought into the content of the discourse. The phrase 'a firm and fair integration/immigration policy' can be found in almost all party programmes. See also Frólund Thomson 2006. For an empirical analysis of the complicated relationship between immigration, politics and the welfare state see Goul Andersen 2006.

It was in this political climate that the Social Democratic–Radical coalition introduced the 1999 Integration Act. Important features were that it put the main responsibility for integration in the hands of municipalities in order to improve the management and coordination of formerly disparate governmental and private bodies (such as the Danish Refugee Council). The integration period for refugees⁶ was extended to 18 months, in which they should learn Danish, familiarise themselves with Danish history, culture and society, and acquire skills and competences to find jobs. During that period refugees would receive a monthly integration allowance (that was in the original proposal lower than regular welfare benefits, but after strong protest changed to the regular level). Family dependents, EU and Nordic citizens and immigrants coming on the so-called Job Card Scheme, i.e. recruited workers, were not obliged to, but were allowed to join the introduction programme.

Under the Liberal–Conservative government that took over from the Social Democratic–Radical coalition in November 2001, tougher governmental policies brought an end to what were labelled lenient immigration policies and practices of the former coalition. A new Ministry for Refugees, Immigration and Integration⁷ was formed, taking over the former tasks of the Ministry of Internal Affairs. This new minister prepared a legislative package on immigration and integration to the Parliament, the principal purpose of which was ‘to restrict the number of immigrants and refugees, to introduce tougher requirements on access to permanent residence and citizenship, to ensure the loyalty of newcomers to “Danish values”, and to speed up the integration of immigrants, particularly of women and young, second generation males, into the labour market’ (Hedetoft 2006, 9). The lower monthly integration allowance that was rejected in 1999 was now re-introduced. These proposals were passed in Parliament in the summer of 2002 with the support of the DPP.⁸

A number of measures followed.⁹ In 2003 the minimum age for marriage migration was increased to 24 years, apart from other requirements like ‘affiliation’ (ties with Denmark), economic independence and proper housing.¹⁰ Conditions for naturalisation, that were already strict through the *ius sanguinis* principle, were tightened: requirements of nine years’ continuous residence, fluency in Danish, proper housing conditions and economic self-sufficiency were formulated. Similar requirements were introduced for acquiring a permanent residence permit. On the other hand anti-discrimination instruments were introduced. In 2003 the Act on Ethnic Equal Treatment was adopted and the Act on Unequal Treatment in the Labour Market was amended in 2004. In 2003, the Danish Institute for Human Rights became the National Equality Body and established the Complaint Committee for Ethnic Equal Treatment to review individual complaints (Ministry 2006b, 70/71).¹¹

⁶ The group of immigrants for which the municipalities have these obligations are ‘persons who 1) got residence permit after 1 January 1999, 2) were 16–64 years of age when they got their residence permit, 3) are from non-EU and non-Nordic countries, and 4) are refugees or family reunified’ (Skifter Andersen, Heinesen & Husted 2005, p. 1).

⁷ See: <http://www.nydanmark.dk>

⁸ Interestingly it was (re-)introduced as a general rule regarding ‘all persons who have not lived in Denmark for the last seven years’. In practice few Danish citizens fall into that category, while most immigrants do. In 2006 the allowances corresponded roughly to 50–70% of the normal allowances. ‘The incentive to take work is considerably enhanced by the new rates’ (Ministry 2006b, p. 65). The qualifying period was by 2006 extended from three years to a maximum of seven years.

⁹ For an overview of the categories of entrance and conditions attached to each see Ministry 2006b, 37–56.

¹⁰ This had consequences both for native Danish and foreign residents in Denmark who want to bring a spouse from abroad. Conversations in Malmö, the city in the south of Sweden that is very near to Copenhagen since the new bridge connects the two cities, indicated that many Danes use Malmö and the more lenient Swedish rules to evade the new Danish restrictions. The bridge is therefore nicknamed the ‘love bridge’. Swedish authorities estimated that there were more than thousand ‘Danish couples’ living in Malmö in 2004 as a consequence of the 24-year rule. Copenhagen city sources, however, suggest that it would be rather around hundred. See also Hedetoft 2006, p. 5.

¹¹ It was indicated that access to and competence of this committee are limited. For example, the committee can only accept complaints from trade union members, if the complainant does not get help from the union. The committee may advise complainants to go to court, but cannot take itself cases to court.

As from 1 January 2004 a new Integration Act and a new Act on Danish Courses for Adult Aliens and Others entered into force. It was based on an agreement with the social partners and local authorities on promoting integration into the labour market and fitted the general policy of the government of 'More people in Work'. Amendments to the law had the purpose of securing flexibility and personal development for newcomers to the labour market. The public sector's efforts were re-directed to three tasks: counselling and upgrading; job training in private and public companies; and employment with a wage supplement. The duration of the formerly three-year individual integration contract has been extended (until the immigrant receives a permanent residence permit, which is normally after seven years) and the form has been changed in order 'to underline the responsibility of the individual foreigner for his or her integration into Danish society' (Ministry 2006b, 61).

In May 2005 a new Integration Plan 'A new chance for everyone' was launched by the national Government, after approval by Parliament. The intention, in the words of the official summary (Ministry 2005a) is 'to enhance its current integration efforts through several new initiatives intended to boost education and employment among immigrants and their descendants, counter ghettoisation in vulnerable neighbourhoods and prevent and combat crime'. The text is again framed generally – for everyone – but will primarily affect people with immigrant background. As to education and employment, new and more compulsory measures are proposed such as 1) to provide more pre-school training; 2) more vocational courses and apprenticeship schemes for youngsters; 3) to oblige young people (18–25) who receive cash assistance to begin a job-qualifying course; 4) to stimulate parents' responsibility by adjusting the family allowance scheme 'so that only young people of 15–17 years who have started a qualifying course or have a job with an educational perspective will be eligible for the allowance'; 5) 'the Government suggests that where both spouses receive cash assistance, the cash assistance to one of the spouses should be replaced by a lower spousal allowance if that spouse has not had ordinary paid work for 300 hours in the preceding two year period'; 6) 'in future, the local authorities must be obliged to provide offers to all recipients of cash assistance – also to people who have passively received maintenance for several years'.

The (English) summary text of the new Integration Plan does not mention diversity policies for employment or in services as part of policies. There are two references that could possibly hint at such policies, as follows: 'The job opportunities of each individual need to be made more visible. In particular, the Government intends to focus on the 25,000 or so vacancies posted each year on Jobnet, the job portal of the public employment service, for which no specific skills are required. Therefore future search results on Jobnet will be grouped into jobs for which no special skills are required (Hotjob) and other jobs' (Ministry 2005a, 2–3). And: 'To assist the local authorities to find jobs for more recipients of cash assistance, the Government will launch the programme 'A new chance for everybody'. This programme is intended to make sure that everybody is given the offers of active involvement that he or she needs. Accordingly, the local authorities will tackle the recipients of cash assistance who have not received any offers of active involvement for a long time' (Ministry 2005a, 3).

Hedetoft (2006, 7) characterises the integration policies of Denmark as follows: 'The official Danish position has been that ethnic minorities should be treated on an equal footing and that the ambition should be to have as few specially designed laws as possible (...) there is little sympathy for multicultural policies or positive discrimination (...) nor are there formalised rules for how institutions may adapt to cultural diversity. The ground rule is that minorities must learn how to come to terms with Denmark – not vice versa.'¹² Consequently, there is also little space for collective organisation of migrant interests. There is freedom to organise, but such organisations are not given much influence. The Council for Ethnic Minorities (CEM) at the national level, and the local Integration Councils at the local level are meant to be sounding boards to governmental agencies.

¹² The Ministry for Integration launched a Diversity Programme in February 2007: <http://www.nyidanmark.dk>

The general picture of national immigration policies of the last two decades is thus one of consistent efforts to restrict further immigration, the only exception being the Job Card Scheme of 2003 that made it easier for highly skilled migrants to enter Denmark.¹³ Integration policies are based on a specific approach: generic policies of equality in the domains of education and labour – increasingly mandatory for newcomers – to fit into Danish society; policies to be implemented at the local level. Anti-discrimination policies are the logical corollary. Cultural and religious factors, however, only appear in their negative forms (of undermining social cohesion): crime, ghettoisation and problems of new religions like Islam.

¹³ The most recent data seem to confirm that on the one hand the government is successful in restricting the unsolicited immigration, but that on the other hand demand-driven immigration is increasing. The Copenhagen Post (February 9–15, p. 7) reports that 46,500 aliens were given a temporary residence permit in Denmark in 2006 ‘nearly 30,000 of those coming either for work or study. In 2001 that number was a mere 13,000, making up only one-third of all residence permits issued.’

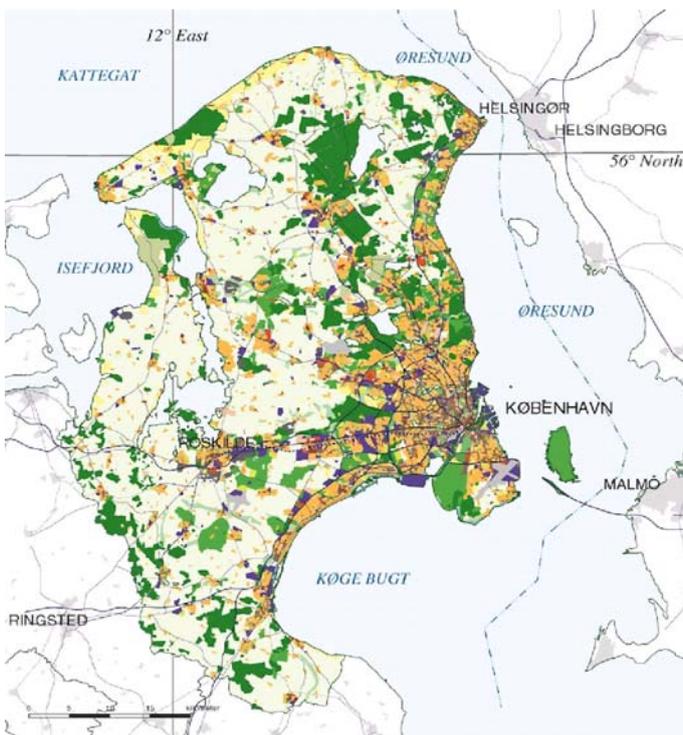
Profile of Copenhagen

General structural data of the city

Copenhagen (literally Merchants' Harbour) is situated on the eastern shore of the Øresund, the strait of water between Denmark and Sweden that connects the North Sea with the Baltic Sea. The city, founded in 1167, developed into an important trading city. In 1807, during the Napoleonic wars, Copenhagen was severely damaged, but recovery took place in the second half of the 19th century based on industrialisation, new crafts, trade and banking (Skifter Anderson et al, 2000).

Nowadays Copenhagen is the capital of Denmark and the country's political and financial centre, with 503,752 inhabitants as at 1 January 2007. The limited physical size of the city – 91 square kilometres – leads to a remarkably high population density of some 5,800 people per square kilometre. The economic profile of the city has changed significantly in recent decades towards an international service-based one: around the turn of the century the city had around 307,000 jobs, 28,000 of them in manufacturing industries, 48,000 in trade and tourism, and 191,000 in other services (Skifter Andersen et al, 2000, 15). Around 15% of the country's gross national product is produced in Copenhagen City. Among the larger and well-known companies are the Carlsberg Breweries, the Novo Nordisk pharmaceuticals, the Maersk shipping conglomerate, the Danisco conglomerate, and the FLS Industries.

Figure 1: *Map of the City of Copenhagen and adjacent region*



Source: *Greater Copenhagen Authority*

Together with the enclave Municipality of Frederiksberg (92,234 inhabitants) and 18 suburban municipalities, Copenhagen City used to form the Wider Territorial Unit for the Urban Audit, with a population of approximately 1.2 million inhabitants (23% of the country's population). The Copenhagen Metropolitan Region, made up of the Wider Territorial Unit and the counties of Frederiksberg and Roskilde, constituted a still larger infrastructural and geographical entity with around one third of the country's population. This administrative structure has been changed as of 1 January

2007 (see Figure 2 below). Since 2000 the Øresund (railway and road) bridge has connected Copenhagen with the south of Sweden, particularly Malmö, thereby creating a transnational economic Øresund zone, facilitating cooperation and exchange on all levels.

Figure 2: The new administrative division since 1/1/2007.

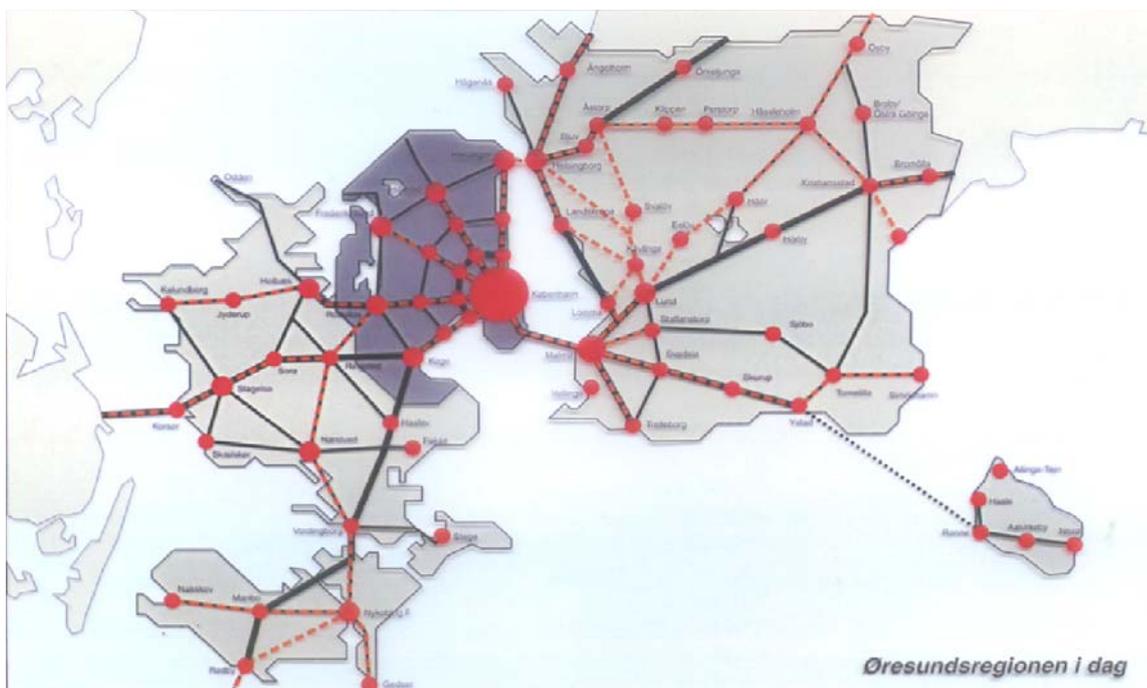


Table 2: Facts about Denmark and Copenhagen plus the surrounding region 2004-2005

	Area km ²	Number of Municipalities*	Dwellings 1.000	Population 1.000	Jobs 1.000
Municipality of Copenhagen	90	1	286	500	320
Copenhagen Region	2.900	29	900	1.830	980
Øresund Region	21.200	79	1.750	3.600	1.720
Danish part	9.800	46	1.200	2.440	1.230
Swedish part	11.400	33	550	1.160	490
Denmark	43.100	98	2.630	5.410	2.700

Note: * 1.1.2007

Municipal migration and integration

The growth of the national immigrant population as described above is reflected in the figures for Copenhagen, but at a significantly higher proportional level: Copenhagen has always been the attraction pole for immigrants to Denmark. As at 1 January 2007 99,799 of the 503,699 inhabitants of Copenhagen had a migration background (they or their parents immigrated): 19.8 percent (Ministeriet 2007, 41). Of all inhabitants 74,362 or 14.8 percent are immigrants in the narrow sense: born outside Denmark. The figures given in any recent policy documents, however, do not relate to immigrants as defined above, but to the target groups of policies: 'immigrants, the descendants of immigrants and refugees from non-Western countries' (Ministry 2005a, 5), excluding Western immigrants. This category was about 9 percent of the population of Copenhagen in the mid-1990s, grew to 14 percent in 2005 (City of Copenhagen 2006, 5) and is 14.4 percent as at 1 January 2008 (Koncernservice, City of Copenhagen 2008).

Copenhagen's integration policy has not escaped the general development and politicisation in the country described above, but the latest municipal policy document entitled 'Integration Policy' (City of Copenhagen 2006) differs somewhat from the national documents in its framing and tone, thereby reflecting the different political orientation of the capital, traditionally predominantly social-democrat. Copenhagen's vision in that document is summarised as follows: 'Copenhagen will be an integrated city in which citizens are able to live together safely and securely, sharing a respect for diversity and common basic values such as freedom of speech, democracy and gender equality. Integration is a mutual process in which all citizens, irrespective of ethnic origin, create and form their society. Integration policy is designed to promote equal opportunities for all' (City of Copenhagen 2006, p. 5). Hints at 'diversity' and 'the mutual process' indicate the specific Copenhagen flavour of the policy, as compared with national policies. It is also more comprehensive than the national documents, including the domains of security, culture and leisure, and health and care, besides the classical topics of labour, education and housing.

The three main principles of city policy underline this: 1) integration is a joint responsibility; 2) integration requires diversity, and 3) integration must be attractive. These principles should be applied in five priority areas of policy for which targets should be attained by 2010. For example: in the domain of labour the proportion of employed among immigrants of working age should be increased from the present 47% to 57% in five years. That should be done by a range of measures including job creation projects, joint action with trade unions and employers, language training, but also by increasing the number of immigrants among city employees and applying 'contract compliance' to stimulate the private market to do so.

Organisation of integration policies in Copenhagen

The highest political authority within the city of Copenhagen is the City Council of 55 members, chosen for four years. There are seven committees of this council. The first and most important one, chaired by the Lord Mayor, is 1) Finances; then there are six executive administrative departments, each having responsibility for a specific field: 2) Children and Youth; 3) Culture and Leisure; 4) Employment and Integration; 5) Health and Care; 6) Social Services; and 7) Technical and Environmental issues.

Before 2005 integration policies for immigrants had to be coordinated across these departments. After the elections of 2005 a special Office for Integration was formed, located in the new Department of Employment and Integration, in order to strengthen the coordination and implementation of policies. The Office for Integration monitors the implementation of the Integration Policy and cooperates with experts from other departments.

Copenhagen has an Integration Council since 1998. The Council used to consist of nominated representatives of ethnic organisations, experts and representatives of the social partners, housing corporations and education. The Council should a) 'attend to the interests of the ethnic minorities and act as their mouthpiece', and b) 'guide the politicians, the standing committees and the administration of the city on how to secure an efficient and coherent integration policy'. It is thus a consultative body with a specific domain. It directly advises the City Council, the highest decision making body of the city. The newest Council is, different from the previous ones, chosen by officially organised elections¹⁴ among immigrants in the city in November 2006 and consists of 23 members. Fifteen of them are directly elected from the population of (non-Western) immigrant origin. The other eight are nominated members from the social partners and civil society organisations.

¹⁴ Notwithstanding huge investment by the city in the electoral procedure (making lists of (non-Western) voters under conditions of protection of privacy, making different ways of voting possible, etc.) only 11.5% of potential voters actually voted. There have been complaints about too little information to the public and confusing messages and procedures. From circles of immigrants it is reported that the Council is not broadly accepted, partly because many do not feel represented and partly because the Council is not seen as influential. The definition of who could vote was also a problem, since citizens with at least one parent with immigrant background could vote. This meant that a lot of citizens who already felt represented by the City Council did not want to take part in the elections

Other sources suggest that the low level of participation is also due to the fact that some local politicians have suggested abolishing the Council. (Since January 2004 such a local Council has become optional, while formerly it was an obligation (§ 42 of the 1999 law), if more than 50 adults of immigrant origin would request so).

The position of the Council changed recently. Its chairman stepped down briefly after I had interviewed him during my first field visit in February 2007. Later that year the Council discussed and accepted a new model for its work to be implemented in 2008. The council has taken a more proactive approach, working as a think-tank.

Approaches to diversity

The city council of Copenhagen has been seriously occupied with equality for quite some time. Since 1998 it has declared that any policy should take diversity in the demographic composition of the population into consideration. This diversity pertains not only to gender and ethnicity, but also to disability and sexual orientation. (Religion is seen as a private matter and is not a criterion for diversity policies.) There is thus a strong political context for diversity according to various criteria for diversity. The ideal is to have any municipal work place mirror the demographic situation of the city.

Although Denmark's (right wing) government has also formulated diversity policies, efforts in this area do seem to be stronger in Copenhagen. This difference is partly symbolised by, or embodied in the new mayor, Ritt Bjerregaard, who was elected in 2005. She is a Social Democrat, who has been a strong protagonist of diversity policies, campaigning with the slogan: 'Let us look at ourselves: we need a 180 degree turn in 180 days' (referring to diversity policies). It is also illustrated in the target formulated for gender diversity, that says that 40% of all top leaders in the city should be women.

Zooming in specifically on the policy intentions of the 2006 Integration Policy document that focus more specifically on diversity policy in employment and in service provision there are a number of explicit statements. As to diversity policy in employment it is stated that the 'city of Copenhagen has a tradition of working closely with employers and unions on job creation projects, within the framework of the Danish model. This cooperation must be maintained, both in the efforts to promote better integration in the labour market, and in job creation projects in general. The cooperation is based on an understanding and recognition of the fact that it is a joint responsibility of the local authority, employers' associations, trade unions, company management and staff to provide a labour market that offers opportunities for everybody. Specifically, this happens through regular meetings between the various stakeholders, specific targets and action plans, and joint campaigns and promotions to get more employed people into work' (City of Copenhagen 2006, p. 13).

A second important statement relates to the city as employer and major buyer: 'The City of Copenhagen is the country's biggest employer with more than 40,000 employees. It therefore has a major opportunity to influence integration in a positive direction through its own recruitment policy. As a workplace, the City of Copenhagen has in recent years increased its proportion of immigrant employees. This has been achieved relatively quickly: in 2001, immigrants accounted for a little less than 8.5% of the workforce, but fewer than 5.5% of council employees (i.e. a gap of 2.8 percentage points). By 2005, this gap had been reduced by almost a third, to two percentage points. Overall, things are moving in the right direction, but there is still an uneven distribution in the proportion of immigrants in the different professions in the council. For example, immigrants account for just 2.6% of graduates employed by the council, despite the fact that the proportion of the city's immigrant citizens who have higher education is almost twice that figure. The City of Copenhagen has the declared objective of achieving a workforce composition in the various sectors that reflects the composition of the city's population.' (City of Copenhagen 2006, p. 16).

A third interesting statement is on contract compliance as an instrument: 'The City is not only an employer, but also a major buyer. It has 15,000 private sector suppliers with a total turnover of approximately 6.5 billion DKK, accounted for by sales to the council. In addition, the City of Copenhagen provides subsidies of a little less than 1 billion DKK and purchases construction projects for approximately 1.2 billion DKK. In the future, the Council will demand that others assume responsibility as well. This will be the case for both private sector suppliers, recipients of subsidies and unions with operational agreements with the council. The stipulations will be valid for all tasks that exceed a minimum amount, in terms of money or time' (City of Copenhagen 2006, p. 17).

As to diversity policy in service provision the policy document does not give a specific statement, but indications can be deduced from the different sections on employment, education and training, housing, security, culture and leisure and health and care services (City of Copenhagen 2006, 11–41). The general gist of the text is that equality of access and of

outcomes are central, an outcome that should be attained by preventing and avoiding obstacles for such equal access and equitable outcomes. For example, in the fields of education and housing (see Penninx 2007) the concentration of 'bilingual pupils' in certain schools and segregation in housing are seen as the main obstacles and policy measures are targeted at these points. As far as policy measures are directly related to the immigrant target groups these aim at 'boosting parental responsibility' and introducing 'all-day schools' in education. The underlying assumption is obviously that these institutions are all right and should not be changed, but that conditions that pervert the equal access and equal outcomes should be targeted.

Finally, the Integration Policy document formulates a number of conditions under which the policy should be developed, implemented and evaluated. It foresees a task for the Integration Council 'to help to draw attention to tangible challenges facing the Council's integration work at an early stage, and serve to inspire new initiatives. The Integration Council also has an important role to play in the evaluation of the work' (City of Copenhagen 2006, p. 43). Furthermore, the policy document plans to provide monitoring, management information and the necessary coordination of integration work between different parts of the administration by a fixed annual procedure of setting targets, choosing objectives, selecting themes for revision and progress reporting in the Employment and Integration Committee. A 'Barometer' will be developed as a monitoring device and biannual evaluations of progress are foreseen' (City of Copenhagen 2006, p. 44).

Employment policy, practice and outcomes

Profile of city employees

The most recent available report on personnel policies of the city of Copenhagen is the one of 2005 (Københavns Kommune 2005). It gives an overview of the city employees according to ethnic background (*etnisk baggrund*) and its development between 2001 and 2005 (Table 3). There is a clear under-representation of immigrants in the workforce of the City of Copenhagen, both for immigrants from EU countries and third countries. This under-representation, however, has decreased in the period 2001–2005. Third country immigrants employed by the city grew from 5% to 8.2%. Employment of third country immigrants has increased in all departments, except the Environment Department.

Table 3: *Employees of the City of Copenhagen according to ethnic background, 2001–2005*

Year	Total	EU countries plus ¹ %		Third countries %	
		2005	2001	2005	2001
Total population	502,362	4.4	4.2	14.6	13.4
Working population	271,629	4.0	3.8	9.9	8.5
City employees	45,607	2.6	2.5	8.2	5.5
Department of:					
Culture and Leisure ²	1,538	2.9	2.4	12.0	12.2
Children and Youth	13,189	2.4	2.5	9.4	6.8
Health and Care	11,271	2.9	3.0	9.2	5.8
Employment/Family	15,585	2.8	2.8	7.3	5.1
Environment	179	1.0	1.2	2.0	2.5
Technical services	2,615	1.8	1.6	3.4	2.0
Finances	1,163	1.2	1.1	1.7	1.6

Note: ¹ Fifteen EU-countries (minus Denmark), Norway, Iceland, Liechtenstein, Switzerland and USA; ² The departments in 2005 and before were different from the present ones given in para 2.3

Source: Københavns Kommune 2005, p. 32

A more precise picture of (third country) immigrants' employment in 2005 arises, when we look at the professions of immigrant employees. In absolute numbers immigrants most often find employment in the health care sector (including care for the elderly), in catering and cleaning, as helpers in the educational sector and as teachers. These same employment sectors are the most important in a relative sense (immigrants as percentage of total employed), but the order is different: nearly one third of cleaning and catering in Copenhagen is done by (third country) immigrants; in the health care sector their share is 10.8%. These concentrations in these sectors make it clear that most immigrants work in relatively low-skilled jobs: the percentages in high-skilled jobs are low: graduates 2.2%, teachers in schools 0.6%, etc.

Table 4: *Employees of the City of Copenhagen according to profession and ethnic background, 2001–2005*

Year	Total	EU countries plus ¹		Third countries	
		2005	2005 (in %)	2005	2005 (in %)
Health care helpers	10,059	307	3.1	1,085	10.8
Catering/cleaning	3,332	99	3.0	1,011	30.3
Educators/helpers in day service	9,176	252	2.7	685	7.5
Teachers	7,306	174	2.4	413	5.7
Clerical staff	5,177	67	1.3	219	4.2
Special and service employees	1,180	47	4.0	83	5.1
Educators/helpers in day/night service	2,212	63	2.8	74	3.3
Graduates	1,786	53	3.0	40	2.2
Other professions	5,379	134	2.7	110	2.0
Total employees	45,607	1,196	2.6	3,720	8.2

Note: ¹ Fifteen EU countries (minus Denmark), Norway, Iceland, Liechtenstein, Switzerland and USA
Source: *Københavns Kommune 2005*, p. 33.

Recent initiatives in personnel policies

The city's stated history of diversity (mangfoldighed) goes back to at least 1998. In that year the Human Resource Office (HRO) of the Finance Department produced a document called 'Room for Everyone'. The diversity concept was defined broadly: equality was the central paradigm and it included various dimensions of diversity, including gender and ethnicity. (Diversity was not so much taken as a cultural concept). In the years after 1998 the HRO had two special officers working on these topics: one for gender and one for ethnicity.

The new mayor of Copenhagen, Ritt Bjerregaard, has given a new impetus to diversity policies since her election 2005. She not only made the topic part of her election campaign as mentioned earlier, but was also in a good position to change policies. As mayor she heads the Department of Finance that coordinates all other departments, but her department also has the basic responsibility for personnel management of the city, located in the HRO. The main premises of diversity policies did not change: diversity in its different dimensions of gender, ethnicity, disability, sexual orientation is part of the policy, and it is still more strongly based on the equality paradigm than that of cultural difference.¹⁵

As to the specific category of immigrants, a number of measures have been introduced since the policy document 'Integration Policy' (2006) was published. First of all, the guiding role of the HRO in relation to recruitment (of immigrants) has been reinforced. Elaborate guidelines have been developed for the departments of the city to be used in recruiting for the departments and training for managers is offered (partly using outside expertise, such as that from the Danish Institute for Human Rights: see later). Furthermore, departments are obliged to monitor and report back to HRO. Setting targets for recruitment, however, is left to the departments themselves. Apart from monitoring in this strict sense,

¹⁵ Some interviewees commented that the new mayor's motivation to reinforce diversity policies in recruitment was strongly driven by the fact that many departments of the city administration had reported difficulties in recruiting personnel, particularly highly qualified workers. This would explain some of the special initiatives to recruit highly qualified employees described below.

the departments are asked to come up with plans and initiatives, make their needs for training, such as discrimination awareness, known. On the first part, it is reported that the guidelines of HRO are by now widely used; on the second part, it is reported that new plans and initiatives from departments are generally 'poor': few initiatives come from the departments themselves.

Secondly, it was decided that – starting from 1 August 2007 – the city would embark on a plan (following a national plan and its facilities) to get more immigrants into higher positions in the city's workforce. The plan foresees that every year 30 'leading positions' will be filled by immigrants. 80% of the costs will be financed by the departments themselves and 20% by extra funds for a maximum of 12 months (minimum of 30 hours a week) that can be spent on e.g. extra training. These positions are meant to be permanent. Furthermore, employees in the two highest grades in the city administration (180 persons) are being trained on a one-day course on diversity management.

Thirdly, the city has done an experiment with anonymous recruitment procedures. This was actually done in relation to recruitment for the Integration Office. No results of this experiment and follow-up decisions are known yet.

Fourthly, the city and particularly the mayor have made a special effort to use the role model strategy to back up municipal policies: publicly announced prizes for exemplary individuals of the target groups and for companies practicing successfully diversity policies are awarded to motivate both target groups and relevant stakeholders of the policy. At the same time information campaigns have been set up, also specifically for ethnic groups, to inform them about planning their careers ('Career Days') and drawing attention to career possibilities as a city employee.

This broad range of policy initiatives is furthermore backed up by a number of initiatives in the field of anti-discrimination policies, treated more extensively below.

Contract compliance

Since 1 January 2007 there has been a city policy that 'social clauses' will be inserted in any contract of the city with suppliers of goods and services that exceed the value of half a million DK (and/or a time validity of at least three months). These 'social clauses' will be negotiated on a voluntary basis between the city and the supplier. They may contain targets as to the number of long-term unemployed, the number of interns and the number of persons with therapeutic employment the firm will have during the contract.

As it transpires from these formulations, there is no explicit reference to diversity, or specifically to ethnicity. The contract compliance policy is primarily related to labour market policies in general and to vulnerable categories in the labour market.

Little is known yet about the implementation of this new policy. The impression from interviews in Copenhagen is that it will take some more time before regular tools and procedures for implementation will be in place.

Combating discrimination

On the national level there is since 2003 – as a consequence of the EU Directive – the Complaints Committee for Ethnic Equal Treatment (CCEET). It is housed within The Danish Institute for Human Rights (DIHR)¹⁶ that has been given the mandate for the CCEET work and tasks. The Committee has three members, appointed by the DIHR. The Committee's task is to handle complaints of differential treatment on the basis of race or ethnic origin and make a statement on the case. Complaints may refer to various situations. If the complaint refers to the labour market, the Complaints Committee can only examine the complaint if the complainant does not receive aid from his/her trade union. The Committee does not represent complainants in court. The Committee may also take initiatives itself to research certain topics/situations without having received complaints. In the year 2005 the Committee received 79 complaints and started 17 own-initiative cases. In 2006 these figures were 76 and 23 respectively.

On the local level the City of Copenhagen has installed a Citizens Advice Service¹⁷ (CAS) to guide citizens with complaints. The Citizens Advice Service can take complaints of discrimination on account of race, skin colour, religion, political persuasion, nationality, social status or ethnic origin and mediate between the complainant and the city. Since January 2007, the CAS has been given its own operational competences: it may take up for systematic investigation cases of principle relating to the city administration's service delivery. Additionally it was given the task to report annually on discrimination, including in the city administration.

The municipality of Copenhagen reports that it is implementing different initiatives on discrimination. The first part of that policy is to better use the possibilities of existing institutions: the CAS is given more visibility by a campaign to citizens about what it does and how to use it.

The second part is to train city staff on discrimination (awareness and recognition of discrimination, competence in combating it), and also ask the seven administrative departments to make plans for anti-discrimination policies internally. The results of this latter are reported to be 'poor'.

The third part is on monitoring discrimination. One of the initiatives here has been the commissioning of a inventory report on all registered complaints of discrimination on whatever ground made to various institutions over the year 2006 by the Documentation and Counselling Centre on Racial Discrimination (DRC 2007). Of the 35 registered cases, 15 had been on grounds of ethnicity. For monitoring, the city of Copenhagen also uses a biannual survey among some 1,000 immigrants and descendants to register 'subjective discrimination' (as perceived by the respondents).¹⁸ Copenhagen's

¹⁶ The DIHR – a continuation of The Danish Centre for Human Rights started in 1987 – was established in 2002 as a national Human Rights Institution in accordance with the UN Paris Principles. It means that the institute is independent, financed for its tasks by a long list of funders, including the Danish government. It has more than 100 employees. DIHR combines a number of functions – protection and promotion of human rights by doing research, information, education and training, project activities and documentation – and houses special committees like the CCEET.

¹⁷ The Citizens Advice Service (equivalent to Ombudsmand) is created by the Copenhagen City Council to make it easier for citizens, users, traders and businessmen in the City of Copenhagen to lodge complaints. The Citizens Advice Service is an independent body, operating outside the control of the City's Administrations, Committees and Mayors. At the Citizens Advice Service, anyone can complain about the City's case handling, the behaviour of staff and the provision of public services, such as housing, teaching, childcare, home help and street cleaning.

¹⁸ A company called Catinet started to do such surveys in 2001. On the national level they report a decreasing percentage of perceived discrimination: 2001: 37%; 2005: 33% and 2007: 28%. See: <http://www.nyidanmark.dk> and <http://www.kk.dk>.

scores in these surveys are slightly better than the national ones: while 28 % of the immigrants felt discriminated against in Denmark, this percentage was 27 % among Copenhagen's immigrants (as against 11 % of native Danes who experienced some form of discrimination). The City of Copenhagen has planned a new website where citizens who have experienced discrimination due to sexual orientation, disabilities, ethnicity, sex, age or gender can register their incident. The website was to be launched on 28 June 2008.

Monitoring policies

As a tool for monitoring immigrant integration policies in Copenhagen in general, the city has devised an instrument called the Integration Barometer. It is a web-based tool through which actual developments can be monitored. The basic layout follows the six main topics/fields of the 2006 policy document on integration policies: labour, education, housing, security, culture and leisure, and health and care. The departments have to report regularly on the targets they have set themselves within these six domains and report on the progress they have made. This has to be done at least once a year, but can be done with shorter intervals. If progress is made towards set targets, a green, smiling symbol affirms that policy is on track. If there is no progress or negative developments a red clearly non-smiling symbol appears and action should be taken.

The barometer monitoring system is in its initial stage, meaning that the baseline has been established through surveys and existing data from the responsible administrations. The monitoring of information is updated once or twice a year. From what has been achieved until now and from what has been reported by some of the departments it becomes clear that the monitoring system is meant primarily as a system to make departments aware of (the effects or non-effects of) their policies by using this explicit and public tool. It is not used as a top-down instrument to control policies. This becomes clear from how target setting works: the general integration policy document sets targets, so in the formal sense the City Council sets these, but these are very general ones as we have seen. These have to be translated into indicators to be measured at the level of departments. This is done primarily by the departments themselves, and they also report on their progress.

The case of the Cleaning Department

Within the Department of Culture and Leisure, within the sub-department of Estate Caretakers, there is a unit under the name of Cleaning Department. This unit has some 300 (city) employees, of which seven are directors/chefs, between nine and 12 coordinators of work, and some 270 workers/cleaners. The unit works mostly for municipal departments, but has no monopoly within the city administration: departments are free to choose their cleaning company. The unit is led by a woman, Heidi Andersen, who had an earlier career in the management of cleaning work in the private sector.

When she became director of the unit four years ago, the percentage of 'immigrants' in the work force of the unit was 37%. In her recruitment strategy the new director has made use of several schemes/plans (funded both by private funders and by the state) for (re-)integration of the long-term unemployed. Many of the new employees thus came with a 'road plan for integration'. At the same time she develops new projects 'to teach her personnel to do simple services besides cleaning proper'. With clients she negotiates comprehensive service agreements. The strong 'social character' of the unit was observable during the interview itself in the way she handled that situation and engaged a number of people in the interview. At the time of the interview she showed the latest report of the Integration Barometer on her unit: it registered that by now 63% of her employees had an immigrant background and all the symbols of the barometer were green and had smiling faces. She says that she makes such reports to the head of the Department every three months and is happy to do so: they are easily readable and not difficult to fill in.

Asked about her appreciation of the city's diversity policy, her answer was clear: 'We were practicing such policies before the city made them. So, it did not change our policies. But I appreciate the new policies very much: they make

the environment much more receptive; it creates openness about these topics; it legitimates our work and policies, both internally and towards our clients. In that sense I appreciate the mayor's clear stance on diversity. That works much better than laws.'

Trade unions

Trade unions are an integral part of policy making on recruitment and work conditions within the city's structure.¹⁹ On the lowest level the unions are organised in a committee at the level of each of the seven departments within the city administration. These committees of chosen representatives do have monthly meetings with the administration on important topics. Trade union representatives report that the topic of diversity policy (including the immigrant part) has never been a controversial topic of negotiation, but rather one of constructive dialogue. No indications from the employers' side have been heard that that was not the case. (Also the director of the cleaning unit had signalled that the specific union for lower-skilled city employees had never opposed her policies; she explicitly tried to involve the unions in such policies).

The case of the Danish Society of Engineers

The Danish Society of Engineers is a trade union, but at the same time also an association of professionals. In the past these two have been separate, but they merged a few years ago. With regard to immigrants they are in an interesting and unexpected position. The labour market for engineers is very positive: the demand for this profession is much higher than the supply. That is the reason why possible exclusion of (foreign educated) immigrants is not an issue. On the contrary, the union wants to get immigrants into their association and into the labour market. They realise that immigrants with a non-Danish qualification are in an impossible situation: they are not accepted as engineers, nor are Danish trade unions keen to accept them, if they start work below their official level. This is seen as false competition.

The association has in recent years started a number of projects. The first kind of project aims at improving the supply side: the association has made a toolbox for immigrants that should give them a clear picture of what the Danish labour market and employers expect from engineers. This toolbox includes language aspects, professional skills comparisons (theoretical and practical) and personal competences. They also developed and give short introduction courses. This toolkit is now being used by jobcentres in Denmark.

Secondly, the association has, in cooperation with companies, developed a tool to evaluate the qualifications of immigrants. The network of companies searching for engineers is matched with the database of individuals that they have built up.

As a third activity, the association has also negotiated with the special Diploma Evaluation Department of the Ministry of Education. That department has the official task of evaluating and deciding what the corresponding level of the diploma in the Danish system would be. That part is still problematic.

The association's collaborators are now actively presenting the tools they have developed to employers, including cities and municipalities. They welcome the new policies of Copenhagen, but have not yet been given an active role.

¹⁹ Union representatives underline that there exists in Copenhagen a kind of natural alliance between trade unions and the strong Social-Democrat representation in the city administration. That party is reported to have adopted quite a few suggestions by the trade unions in the elections.

Diversity in service provision

As stated before, diversity policy in service provision is not an explicit aim of Copenhagen's policy. The general gist of policy statements is that equality of access and of outcomes is important. Obstacles to such equal access and equitable outcomes should be avoided and taken away. The use of specific instruments targeted at immigrants or the adaptation of established institutions in order to ease access and promote equity of outcomes do not fit – as explicit instruments – into the dominant philosophy of general policies (see also the earlier report on housing of immigrants: Penninx 2007).

The absence of such policy statements, however, does not necessarily mean that diversity in service provision does not exist. In the housing report we have seen already that it may turn up at the lowest level of policy practice, where social and organisational work in apartment blocks may adapt itself to the diversity of the population. Interviews in the public health sector in Copenhagen uncovered another example of diversity in service provision at the level of implementation.

The case of information and prevention programmes in public health

The Public Health Office within the Department of Health and Care is responsible for health promotion by undertaking campaigns of information and prevention. The general target groups are 1) children and adolescents, 2) adults, and 3) the elderly. The department has a staff of some 60 people.

In implementing their 2003 Action Plan for Promotion of Health they realised that they would not reach a growing category of immigrants in the city with the instruments they normally used. That awareness led to a few specific interventions, but these were bound to be incidental, because they were not part of the regular system.

In 2005 the department acquired extra funds to do a 'Peer Intervention Project'. This project entailed the recruitment and training of 'consultants' of immigrant background over a period of four months, one day a week. They were trained in general topics of health and they could specialise in a specific topic, such as dental health or reproductive health. The training was free of charge.

There turned out to be a great interest in this training, as manifested by many applications. Of the 25 candidates chosen, one-third had some educational or work background in the medical sector, one-third had experience in a pedagogical profession and the rest had no background in these two. The training was not presented as a leading to a job: the candidates would become 'health educators'. They could be hired to do or assist in meetings with specific audiences of immigrants and would be paid for that by the hour. They covered seven immigrant languages altogether.

What started as an experimental project became after a year and a half a structural part of the policy, in terms of content, organisationally and financially. The office has trained a pool of 44 health educators. In the year 2006 they held 250 meetings with an average of 18 attendants. Two of the trained health educators have obtained a permanent job with the office.

An interesting feature of this example is that it shows how a specific approach for specific groups may become 'mainstreamed' (in the sense that it not only becomes a regular part of the activity, but also a regular part of the budget), notwithstanding the general formulation of official policies.²⁰ The case is at the same time a good example how practitioners may mobilise potential resources within immigrant groups in order to reach their goals.

²⁰ In the policy document of 2006 there has been no mention of the approach described in the case, although it existed already at that time as a regular activity of the Health Office. The speaker of the Integration Office explained this absence indicating that the content of the integration policy on health was coordinated with the health department that formulated its own policy. The Health Department obviously did not want to distinguish between groups for political reasons, but in practice they targeted different groups.

Conclusions

Denmark is a welfare state in a rather pronounced form. It has inclusive policies, not only for its citizens but also for all legal residents. Equality and equal treatment are keywords in the political discourse. Combating unequal treatment and discrimination is the logical negative corollary.

From a European comparative perspective, Danish immigration and integration policies have developed a specific flavour. Immigration, particularly from non-Western countries, is predominantly seen as a possible threat to the welfare state on the one hand and in recent years also as a threat to Danish identity and values (mirrored in the discussions of 'parallel societies'). Immigration policies are thus very restrictive, particularly for categories of immigrant that are perceived as embodying such threats. Integration policies are based on a particular combination of three principles: a) they are targeted at specific, problematic individuals, identified and named by general socio-economic criteria, not by ethnic, cultural or religious characteristics; b) they are formulated in general principles of equality; c) they are strongly oriented towards specific domains of work, education and housing.

The combination of these principles leads to ambivalence – from the point of view of immigrant integration policies – towards the target groups. The defining element of the statistical category of non-western immigrants is less their migration per se and more the problematic characteristics of some of them; this also leads a specific view of culture, language and religion; these are not defined as policy domains in themselves, but appear predominantly as negative elements for the priority domains of work, education and housing. The Danish 'model' of integration of immigrants is targeted at individuals and based on general principles as opposed to models that explicitly define (ethnic or immigrant) target groups and develop specific strategies that go with it.²¹

The city of Copenhagen follows the national model to a great extent, but also deviates from the national model in framing the integration process as a mutual process and naming diversity as a potential asset, by stressing less the mandatory nature of measures and more the engagement of various actors in society.

Diversity as personnel policy has a longer history in Copenhagen, going back at least to 1998. It has always been broadly defined, including diversity of gender, ethnicity (= immigrant background), disability and sexual orientation (but explicitly not religion). The major focus seems to lie in recruitment, which corroborates the main political motivation, namely that the work force of the city should reflect its demographic composition.

In recent years diversity policy has received a fresh impetus by very explicit statements in the 2006 policy document on immigrant integration and by the authority of the new mayor who made diversity a policy spearhead. New impetus is given to guiding the recruitment of new employees, (discrimination) awareness training for management staff, anti-discrimination measures and facilities for complainants, a monitoring system and in some cases even specific targets and measures (such as the 40% target for women in higher positions and the increase in the number of high positions taken by people with an immigrant background). The city is even setting up a system of contract compliance through which it wants to make goods and service deliverers contribute to its diversity policies, although this focuses primarily on the general category of vulnerable workers in the labour market.

In general, this policy is more based on mobilisation from below than on top down measures. This is most clearly expressed in the fact that the general targets formulated by the City Council are translated into the specific targets of departments by the departments themselves. This way of working – by awareness training and rewarding rather than by

²¹ For an elaboration of such models and their internal logic see Penninx and Martiniello 2004.

compulsion – is in general appreciated. Departments that had already been very active in this domain have seen their activities legitimised in the new policies and thus made easier. The departments involved happen to be ones that have a great need for low-skilled workers. Some, however, see the lack of compulsory elements as a weakness of the policy.

Although the results of the new policies cannot yet be measured, the data on the preceding period 2001-2005 suggest that the Copenhagen policies have been successful. Data on employment do show an under-representation of immigrants in the city's workforce, but also a significant decrease in this under-representation within a relatively short time.²² Obviously, there is a selective, strong presence of immigrants in the lower-skilled sectors and professions. It is assumed that this reflects to a great extent the basic qualifications of immigrant workers, but this is not necessarily the case. At least in one profession, that of engineering, there exists an awareness – helped by a great demand for the profession in the country – that many foreign qualified engineers do have difficulties in practising their profession in Denmark. The Association of Engineers has interesting initiatives to make it easier for foreign-qualified engineers to become professionally employed in Denmark.

The case of diversity in service provision in Copenhagen is much more complicated. First of all, it is not an explicit aim of Copenhagen's policy. The general gist of policy statements is that equality of access and of outcomes is important. Such outcomes should be attained by preventing and avoiding obstacles. The use of specific instruments targeted at immigrants or the adaptation of established institutions in order to ease access and promote equity of outcomes do not fit in the dominant philosophy of general policies (see also the earlier report on housing of immigrants: Penninx 2007).

The absence of such policy statements, however, does not necessarily mean that diversity in service provision does not exist. In the housing report we have seen already that it may turn up at the lowest level of policy practice, where social and organisational work in apartment blocks may adapt itself to the diversity of the population. Interviews in the public health sector in Copenhagen revealed another example of diversity in service provision in the health sector. There is a basic difference between diversity as personnel policies and diversity policies in service delivery in Copenhagen: while active practitioners in the first field have perceived the new Copenhagen Integration Policy of 2006 as stimulating and a legitimisation and recognition for their work, those working on diversity of service delivery did not find this stimulus in the new document.

²² In the absence of direct comparable data for cities in Europe on employment of immigrants any comparative evaluation is difficult, but the impression from this study is that Copenhagen city's level of employment of immigrants is relatively high.

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