

TRADE UNION RESPONSES TO IMMIGRATION AND
ETHNIC INEQUALITY IN DENMARK AND THE UK:
THE CONTEXT OF CONFLICT AND CONSENSUS

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European trade unions and their confederations are finding that they need to address new policy issues in relation to the increasing proportion of immigrants, refugees and ethnic minorities in the national workforce and amongst their membership. Issues of equal treatment and anti-discrimination are being increasingly raised, along with the question of the appropriate responses of trade unions. In 2003 there was an added stimulus to this in the form of the two new European Union Equality Directives, the “Racial Equality” Directive¹ and the Employment Equality Directive² which had to be transposed into national arrangements by 19 July and 2 December 2003 respectively. The Directives place a duty on all Member States to improve existing legislation against employment discrimination and create bodies to advise and assist victims of discrimination.

There has been enormous variety in European trade union responses to the issue of racial discrimination. In some Member States racial equality and the related policies have been on union agendas for 20 years, whilst in others the issue has barely been addressed. There is also great variety in the character of discourse on the issue, the way that discrimination is defined, and the policies that are deemed appropriate (Wrench 2000a). Much of this division falls along a north-south divide, with northern European countries more concerned with informal racial discrimination, its implications for the opportunities of an established second or third generation of post-war migrant origin, and the equal opportunities strategies to combat this, whereas in countries of southern Europe unions tend to be more preoccupied with the issues of a relatively recent influx of immigrants, working precariously on short term work permits, and with a very large problem of undocumented workers suffering extreme exploitation. However, even between two countries of northern Europe, there can be significant differences. This paper takes two such countries, Denmark and the UK, identifies very different approaches to immigrants and ethnic inequality, and suggests some relevant variables of national difference which might be drawn upon to explain this. Whilst there have been earlier comparisons of Denmark and the UK in terms of union practices (for example, Scheuer, 1997, on collective bargaining) there has been little on activities regarding immigrants and ethnic equality.

Penninx and Roosblad suggest a categorisation of four sets of factors which might account for national differences in union policies towards immigrants (Penninx and Roosblad 2000: 13 – 15).

1. The position of the trade union movement in a society, its power and its structure.
2. The condition of the economy and the labour market within that society at the time of the particular union stance or practice.
3. The context of the society as a whole, its institutions, the political structure, legislation, national ideologies and public discourse.
4. The characteristics of the immigrants themselves.

It might be thought that the first two sets of factors would be of over-riding importance, as they relate directly to the power of a trade union movement at a

¹ Council Directive 2000/43/EC of 29 June 2000 implementing the principle of equal treatment between persons irrespective of racial or ethnic origin.

² Council Directive 2000/78/EC of 27 November 2000 establishing a general framework for equal treatment in employment and occupation.

particular moment to achieve what it wants. However, this paper suggests that it is explanations within the third category that appear to have an over-riding significance when it comes to understanding differences in the approaches of unions in the UK and Denmark. In particular, within this third category fall two important factors. One is the quality of public discourse on immigrants, ethnic minorities and multiculturalism, in particular that which is given out by political opinion leaders. The other is the dimension of 'conflict' versus 'consensus' in political life, which is also reflected in the relationship between trade unions, employers and government.

Anglo-Saxon and Nordic models

There are major differences in the Anglo-Saxon and Nordic models of labour market regulation (Nielsen 1996). One dimension which can be used to characterise the British and Danish approaches respectively is that of 'conflict' versus 'consensus'. Of course, conflict is inherent in all systems of industrial relations. Nevertheless, we can say that in Denmark industrial relations has been characterised by greater cooperation and interdependence between the two sides³, whereas in Britain conflict and confrontation are seen as more 'normal'. The characteristics of Danish industrial relations have been summed up as follows:

The main features are a highly organised labour market both on the employers' and the employee's sides, with widespread co-operation and consensus between trade unions and employers and their organisations; centralised and nation-wide collective agreements; widespread codetermination/democracy in working life; active state support of class collaboration with an effective system of conflict solution; and comprehensive state intervention in the labour market characterised by corporatist (tripartite) decision-making processes and implementation (Lind 2000: 146).

In contrast, in Britain, although unions have not shown the wider political militancy of unions in France and Southern Europe, their position has been characterised historically as "a resistance to change and an adversarial posture in the workplace" (Edwards et al 1992: 5). In Britain, both the unions and the employers organisations are relatively weak compared to Denmark. Britain has many more large employers, whereas Denmark is characterised by the predominance of small and medium sized firms, a structural factor which induces employers to form organisations and conclude collective agreements with trade unions (Due et al 1994). Correspondingly, the attitudes of Danish governments of recent years have not been antagonistic towards unions, in strong contrast to the way that the Conservative government behaved towards British unions between 1979 - 1997.

In Denmark, the responsibility for policing (legally binding) collective agreements gives trade unions a great deal of formal power, and this exists largely independent of membership militancy and is less sensitive to unemployment (Scheuer 1992). In Britain, in contrast, the level of union power reflects more directly the context of recessions or economic upturns. One question in this paper is whether such differences have implications for policies regarding immigrants and ethnic minorities. For example, the greater institutional power of the Danish trade union movement

³ Authors who set out the specificities of "the Danish model", with its implications for trade unions and the character of industrial relations are Scheuer 1992, Due et al 1994, Lind 1995, and Nielsen 1996.

suggests that they are in a better position to fight for policies of equality and anti-discrimination than their weaker British counterparts.

Methodology

The main source of material for this research was a programme of interviews with 20 activists in Denmark, most of whom were trade union members of NIF⁴, a network for foreigners, ethnic minorities, refugees and Danes who wish to involve themselves in issues of ethnic equality in trade unions, the labour market and the workplace. Most of the interviews were tape recorded and fully transcribed. Three further interviews were carried out with activists for ethnic equality who were working in NGOs in Copenhagen and whose daily work put them in a good position to comment on the activities of trade unions in this field.

There were also interviews with 10 British trade union activists, all officers in British trade unions with special responsibility for issues of ethnic equality, apart from one, who was a union General Secretary with a particular interest in ethnic equality issues. Fewer interviews were carried out in the UK as there already exists quite an extensive academic literature on British trade unions, racism and ethnic equality.⁵ Also, for that same reason, a greater emphasis is given within this paper to the descriptive Danish material than to the British.

Unions and 'equal treatment'

According to Penninx and Roosblad, one of the dilemmas facing trade unions is whether special policies, services and facilities should be established for immigrants and ethnic minorities within the workplace or within the unions themselves. What should now be the 'minimum position' is described by Martens (1999: 224) as "guaranteeing access, advancement, training, pay, and the like for all jobs in all sectors without restrictions or limitations for all immigrants or foreigners who already reside, for a specific period of time, in the host country." Martens continues "It must be said, however, that trade unions seem to have difficulty in coming to grips with equal treatment."

One problem here is the confusion that can exist around terms such as 'equal treatment' or 'equal opportunities'. What constitutes broader equal opportunities activity can be categorised under the following headings:⁶

- The *equal treatment approach*. With this approach, it is believed that equal opportunities follows on from making sure that all are treated the same, regardless of ethnicity or colour. This is the classic 'colour-blind' approach.
- The *'level playing field' approach*. This recognises the need to remove some unfair barriers (of, for example, racism or discrimination) which operate in the labour market, so that all have a fair chance at the opportunities which are available.
- The *equal opportunities approach*. This aims for longer term proportional representation of minorities by a range of organisational measures, such as

⁴ *Netværk i Fagbevægelsen*, which translates literally as "Network in the Trade Union Movement"

⁵ For example, Radin (1966), Runnymede Trust (1974-5), Bentley (1976), Phizacklea and Miles (1980), Lee (1984), Wrench (1987), Ramdin (1987), Virdee and Grint (1994), Wrench and Virdee (1996), Wrench (2000b), Virdee (2000).

⁶ This classification draws on MacEwan 1995, with some modifications.

ethnic monitoring and targets. It might include ethnic record keeping, and elements of 'positive action' to overcome the effects of past inequalities.

- The *equal outcome approach*. This uses quotas and 'positive discrimination' to achieve a much shorter-term proportional representation of minorities. It is the most controversial type, seen by many to be in breach of natural justice.

Special policies in the UK

The dilemma of equal treatment was a question which began to occupy British trade unionists in the 1960s with regard to their new immigrant membership. Developments in the UK moved roughly in sequence through the four categorisations above. Firstly, the "equal treatment" approach was taken for granted. There was initially a consensus that to institute any special policies would be to discriminate against the white membership (Radin 1966). This classic 'colour blind' position was spelled out to justify this approach in 1970 by the General Secretary of the TUC when he said "The trade union movement is concerned with a man or a woman as a worker. The colour of a man's skin has no relevance whatever to his work" (*Sunday Times* 3 December 1972). However, in the early 1970s the TUC changed its stance and began move to the "level playing field" approach, realising that special anti-discrimination and anti-racism policies were needed. The TUC adopted policies against racism, beginning with educational and training materials on equal opportunities and racism for use in trade union education courses. Then, in 1979 the TUC sent out a circular to all its affiliated unions recommending that they should adopt a policy on racism. In 1981 the TUC published "Black⁷ Workers: A TUC Charter for Equal Opportunity", encouraging unions be more active on the issue.

By the 1980s British unions were going further than just anti-racism and anti-discrimination. They were also setting up special equal opportunities structures with elements of positive action – i.e. the third level. Since the 1980s many unions have created national officers to take responsibility for issues affecting black members, for encouraging the participation of black members and furthering equal opportunities. Increasingly, individual unions have set up separate committees to deal with race relations and/or equal opportunities issues, and many have forms of "self-organisation" structures for black members (Virdee and Grint 1994). Some unions have reserved or additional seats on national executive committees for representatives of the black membership. By 1993 a survey of 21 unions, covering two-thirds of TUC affiliated membership (*Equal Opportunities Review* September/October 1993) had shown that at a national level ten unions had a committee dealing specifically with race equality issues, and nine had some black full-time officials. Nearly two-thirds of unions had taken positive action steps such as organising conferences for black members and producing literature in ethnic minority languages. The TUC Annual Congress in 2001 agreed to change TUC rules so that all affiliates are committed to promoting equality, and the unions agreed to report back to the Congress every two years on their progress on this.

After many years of collective pressure by activists within and outside the trade union movement, appropriate 'race' and equal opportunity structures are finally being put

⁷ British trade union activists tend to use the term 'black' as a general term to include people of African, Caribbean, Indian, Pakistani or Bangla Deshi origin. In this paper the term 'black' will be used interchangeably with the term 'ethnic minority' in relation to the British material.

into place within British unions. The minimalist “equal treatment” level has been long abandoned, and current policies range across levels two and three. Whilst we would not expect unions to adopt policies within the fourth and most extreme “equal outcomes” approach of positive discrimination (which would risk being identified as unlawful in the UK), there were in the 1990s some policies which might be categorised as being on the fringes of this. Some unions have adopted a policy of reserved seats on their governing bodies, which guarantee a place for a minimum number of black members. This transcends the normal voting procedures. It is an intrinsically more controversial policy, as can be seen from the fact in the opinion of some union lawyers it is actually on the margins of legality. For this reason other unions “play safe” and create what they call “additional” rather than “reserved” seats for black members on their governing bodies.

Special policies in Denmark

In Denmark, in the first years of immigration, the 1960s and 1970s, unions devoted a lot of resources to getting immigrants organised into unions and the unemployment insurance schemes, and checking that they received equal pay as Danes. However, the “equal treatment” approach by trade union leaders appeared to have been held on to by trade union leaders far longer than it was in the UK. The Danish trade union leadership, from the mid-1970s to the late 1990s, were reluctant to consider any special measures relating to the particular problems of members of foreign origin, even though it was clear that racism was growing in Danish society, and the rate of unemployment of people of immigrant origin or descent was three or four times that of the white Danish population. The philosophy was strictly one of “equal treatment”, narrowly defined, since union leaders were sensitive to the fact that any ‘positive action’ might be unpopular with their Danish majority membership. The ‘social partners’ were in agreement on this - for example, the policy of the DA; the Danish Employers’ Confederation,⁸ in the early 1990s was that refugees and immigrants should not be regarded as a special group. The rights and obligations of foreign nationals, they argued, were regulated by the same laws and regulations as apply to Danish citizens. The fact that foreign nationals were guaranteed equal conditions of employment, pay, vacation and unemployment insurance as Danes, meant that there was no need for any special measures (Hjarnø 1995a).

In the 1990s various unions started a range of initiatives to better the integration of immigrants into employment. Advisers were recruited to help qualified immigrants find work, schemes were introduced to activate unemployed ethnic minority women, and support was given for positive action schemes for the training of young people of immigrant origin. Local branches of one union began to organise courses for immigrants in the Danish language and in industrial relations, and special courses for immigrants in health and safety, particularly for safety representatives. In the summer of 1993 the General Workers Union SiD took the initiative of gathering together officials from a number of unions who were concerned about the increasingly strident tone of the Danish debate on immigrants, and drew up a proposal for an initiative against racism and xenophobia. One outcome of this was the creation of the trade union network known as “NIF”. The aim of the network was to improve conditions for ethnic minorities in the labour market and to build bridges between ethnic minorities and the trade unions.

⁸ *Dansk Arbejdsgiverforening*

One of the first NIF initiatives was the publication of a booklet for immigrants and refugees, providing them with basic information on their opportunities, rights and obligations. Another has been to provide a directory of 40-50 speakers, most of whom are from an ethnic minority background, who speak at meetings of Danish trade unionists and others about issues of cultural difference, ethnic equality and discrimination. By the end of the 1990s the union with the most ambitious ethnic equality plan was HK, the Union of Commercial and Clerical Employees. The objective of the plan was to “ensure true equality between ethnic minorities and Danes in the labour market and in society”. Internally it aims to increase ethnic minority membership, identify and involve ethnic minority members in the union, break down barriers to participation in union positions and structures, and work to ensure that the contents of collective and local agreements promote ethnic equality. Much of this was to be done by special conferences, training, and awareness raising campaigns.

In 1999 the LO⁹ and the DA publicly committed themselves to start initiatives to promote ethnic equality and combat racism. Then in 2002 they signed an agreement on the better integration of refugees and immigrants. Their proposals included that refugees and immigrants should as quickly as possible be given a contractual relationship with an enterprise, that Danish language teaching should be started at once, preferably in the enterprise itself, and during working hours, and that the skills and qualifications of refugees and immigrants are translated as quickly as possible into corresponding Danish qualifications.

Differences between Denmark and the UK

The comparison between British and Danish union policies reveals some differences in emphasis. In terms of the four different levels of activity, the British unions, after the initial “equal treatment” phase, moved on to the second phase in the 1970s and by the 1980s they had embraced “equal opportunities” activities of special policies and positive action. By the 1990s there was in the UK a far greater and more established range of policies and structures than in Denmark, with self-organisation of black members and relatively strong positive action measures such as reserved seats on executive bodies. The UK policies also seem to have reflected, since the 1970s, a strong awareness of issues of racism and discrimination.

In Denmark, the unions held on much longer to an “equal treatment” view, embracing changes in union structures to a much lesser degree. Instead the emphasis has been more on improving the participation of ethnic minorities in unions without significant changes to current structures. The focus of Danish union policies were more on language and education courses for immigrants, work related training, and counselling and advice for them, including a desire to activate those groups that were disproportionately economically inactive. When barriers have been identified in the attitudes and practices of employers and union members themselves, the main thrust of solutions seems to be on campaigns of information and persuasion. One implicit assumption behind many of the Danish activities is that the problem of ethnic equality is in large part related to deficits within immigrant communities themselves. Another is that changes in both unions’ and employers’ practices will come about through

⁹ *Landsorganisationen i Danmark*, the Danish Confederation of Trade Unions

education, awareness-raising, and persuasion. This contrasts with the British approach where there is an underlying assumption of the existence of racism and discrimination as processes of exclusion and a stronger focus on changing structures and policing behaviour. The specific 'anti-discrimination' awareness seems to be reflected less in the Danish approach.

It is interesting to see whether these differences in emphasis are reflected in the respective discourse of the ten British and twenty Danish activists. It should be remembered that these interviewees represent the best informed opinion and widest experience on this topic in their respective countries.

British activists and union policies

There were eight individual British unions represented by the ten interviewees, who talked in detail about the range of policies within their respective unions. With regard to the practice of monitoring the ethnic origin of the union membership, not one of the ten British interviewees raised any objections to this, or questioned its value. The only questions that were raised concerned the precise form that ethnic monitoring should take in different circumstances, and what the categories should be. All of the respondents envisaged a longer term aim of identifying accurately the union membership by ethnic origin.

Some of the most ambitious positive action measures discussed by the respondents were the range of self-organisation structures in unions. Again, not one of the 10 interviewees expressed any reservations about the principle of self-organised black groups. As with the issue of ethnic monitoring, the debate was over the precise form that these should take, rather than over the principle itself. In one large white collar union there were self-organised groups at different levels, including regional black members committees and, at a local level black members self-organised groups. An official of this union felt that these structural changes over the last few years had helped to produce the result that "the agenda of the union is now beginning to address the diverse makeup of the union". The fact that the black workers structures were successfully enhancing the participation of black members could be seen in one London local branch of the union, where 47 per cent of the members are black and 52 per cent of the branch executive are black members.

One of the more radical positive action measures mentioned by some respondents was that of having reserved places for black members on union governing bodies. The representative of one white collar union explained:

Before, we had a problem of black members standing for election to the executive and not getting elected. Therefore the executive was not representative. Now we have guaranteed places on the national executive. If 50 people stand for 20 places, and if there is no black person among the 20, the highest place black person displaces the lowest polling white member.

He observed that there was no resentment amongst the white membership when this happens. "Everyone understands that this could happen, and they realise that this is necessary – without this reserved seat there would be no black person on the executive."

Six of the ten British respondents were able to talk in detail about the problem of racial harassment and the union policy in relation to it. An activist in a civil service union saw that “harassment at work is still a big issue – either from other staff, or from the public. We need to do much more on this”. A union in the educational sector was working to get anti-harassment policies into the national collective agreement with employers, and a union in the financial sector had set up a racial harassment counselling network and created racial harassment counsellors to provide support to victims. A white collar union produced a publication called “Racial harassment is not part of the job”. A public sector union had recently introduced a rule in the union rule book making racial harassment an offence, and stating that “if a member is accused of racism they must demonstrate that they didn’t do it or the union won’t support them.”

Three of the respondents mentioned one problematic element of verbal harassment, namely the culture of racist ‘jokes’ at the workplace. One representative of a transport union stated “We make a clear statement about such ‘jokes’ being unacceptable. The only criteria which is valid is whether the recipient finds it offensive”. Similarly a teachers’ union official stated with regard to racist ‘jokes’: “As a union we’re quite clear – that’s just unacceptable behaviour. We won’t accept that if it happens in the school. We won’t accept it from pupils – it’s in our code of professional conduct.”

Several of the respondents noted that their unions had started initiatives to try to improve the unions’ handling of discrimination cases, such as providing special training on how to handle complaints of discrimination, and on how to take cases to industrial tribunals.

Danish activists and union policies

The interviews with the Danish trade unionists revealed very different attitudes compared to their British counterparts. Whilst from the UK interviewees there was an unquestioning acceptance that the monitoring of ethnic background was essential, the Danish responses were very mixed. A small minority held the same opinion as the British respondents, and thought that monitoring was an essential pillar of future policies. A larger number were sympathetic to the idea in theory, yet held strong reservations about using it in practice. And the remainder, when they had any opinion at all, were strongly against it. Several saw it as “not the Danish way of doing things”. Another woman of immigrant origin argued “I think Denmark perhaps is different from many other countries because we’re not that categorical. We take each individual and we look at that individual. We don’t put them into boxes”. One Danish man said that this would be very controversial in Denmark, but he actually liked the fact that it was made legally difficult to do in practice. “In some ways I like that law. It means as a political party you can’t do something on the grounds of colour”. Certainly the legal ambiguity which still existed around the practice in Denmark made it more difficult for those who wanted to monitor, and provided a good excuse for those who did not.

One reason for monitoring is that it allows employers to introduce targets, such as trying to represent the local ethnic breakdown of the population in the workforce. However, for most of the activists, this was going too far. For Denmark, this was “too soon” or “too controversial”. One rejected it because he confused it with positive discrimination; another thought that at best it should be done “informally”, just

encouraging people to do it, but without making it a formal policy. Other activists had reservations about extra training specifically for immigrant members to equip them better for union positions. One said “Yes. I think definitely it would be a good idea. But maybe it will take 20 years!” This was because in Denmark he predicted that it would be seen as “positive discrimination”. Similarly, there were reservations about special groups within unions, or special conferences. Another respondent said “Every little group will want a special committee – I think many people [will] think [that] it’s stupid. Crazy. We don’t do that.”

We have seen that in the UK a number of unions had adopted policies of reserved seats on union committees, so as to ensure that there was always at least one black representative on important bodies. This is a stronger type of positive action which borders on the fourth “equal outcome” category, and is intrinsically more controversial (although this does not give preferential access to a job, but is a device to allow minorities to get their voices heard in union decision-making). Therefore, if some of the more ‘routine’ types of equal opportunity and positive action measures were questioned by many of the NIF activists, it was perhaps not surprising that this measure was even more unacceptable, and certainly not seen as “the Danish way of doing things”. One activist typified the response of many others: “It’s not realistic in Denmark. I don’t think it would be seen as acceptable. In Denmark there is no tradition of this – things work in a different way here”. A more acceptable alternative was simply “encouraging” minorities to stand for office.

Most of the policies discussed above could be categorised as extra positive action policies which fall into the category of the third “equal opportunities” level. Yet even the more apparently straightforward “anti-discrimination” practices of level two were relatively neglected in the discourse of the Danish compared to the British respondents. Most of the Danish respondents had never even considered union policies against physical or verbal harassment at the workplace. When prompted by the interviewer as to whether the unions should be adopting such policies, the typical responses were rather hesitant. One ethnic minority woman replied “It depends on how you use it – it might be used wrongly ... I think it would be difficult to show that it had taken place” and a man stated “We have rules against sexual harassment but I don’t know of any cases of racial harassment”. The coordinator of one local NIF group ventured the opinion that there was no problem of racial harassment in Danish workplaces – “We talk nice to each other and don’t fight”. When asked about whether there were ever problems of a workplace culture of racist jokes, several respondents replied that “You can’t make rules about jokes”. Again the predominant sentiment seemed to be that this was “not the Danish way of doing things”. One union official explained “I think its maybe that we should find a characteristic Danish way in this – we can talk about it, we can find a way, and we can find a solution by discussion.” He felt that in 90 per cent of all cases it would be possible to sort it out in this particularly Danish way. Nevertheless, even though a formal anti-harassment policy would probably be necessary for that last 10 per cent, “I don’t think that we would get an acceptance of that strategy”.

Does the apparently weaker emphasis by Danish trade union activists on issues of racism, discrimination and harassment at work, and on the specific union policies to combat this, reflect a ‘lack of awareness’ of a problem which is often intrinsically difficult to see? Alternatively, does it simply reflect the genuine reality of a much

lesser problem of racism and discrimination in the Danish workplace when compared to the UK? The problem of racial discrimination in the UK labour market is well known, as indicated by years of research evidence and industrial tribunal cases. The issue of employment discrimination in Denmark will be considered next.

Danish activists' experiences of discrimination

There had already been research evidence of racial discrimination in the Danish labour market. (For example, Hjarnø and Jensen - 1997 - used matched pair discrimination testing in Copenhagen and found out that the degree of discrimination against ethnic minority job applicants was around 38 per cent.) The Danish respondents were asked if they knew of incidents of discrimination either from their own experience or from others, and whether experiences of discrimination elicited any response from trade unions. There were many examples of incidents of racism and discrimination quoted, which cannot be set out in this short paper. For one thing, the NIF interviewees were well aware of the tremendous problems immigrants and refugees had in finding a job in the first place. A respondent from Århus stated that he knew of a young person from Afghanistan who wanted to be an apprentice and tried 100 places without getting accepted. One respondent was working on a special scheme for the municipality to find work for immigrants. He telephoned an employer, mentioned the man's name, Mohammed, and was told the job was gone. He then asked his female colleague sitting next to him to telephone the same employer, and she was told the job was still available. Similarly an Århus respondent described how one of his Arabic friends, who had been educated in Denmark, wrote to 20 or 30 companies to get a job. "Why wasn't he successful? So he changed his name on one letter to a Danish name and sent it to the same factory and got a letter back, 'We are very interested, come along that day'".

The very nature of the job application process usually means that discrimination at this stage is hidden from the victim. However, once a person is actually at the work place, any differences in the way he or she is treated are more easily recognised. The majority of the 20 interviewees could give examples of the sorts of problems experienced by themselves or others, of how ethnic minorities were being treated differently by co-workers and supervisors. Sometimes people didn't respect their experience or their qualifications. Often people made unjustifiable assumptions about them, rooted in some simplistic ideas about culture. Sometimes people would make racist jokes. Fellow workers would take up stories that were in the media, and they would complain that "all immigrants are criminals" or "all immigrants just come here to get money from the social security" and then finish by saying "Oh, of course I don't mean you". A respondent had experience of a Somali man on a work experience placement as an electrician having to endure a climate of "very nasty racist jokes" and finally told to leave because some of the firm's customers had made it clear that they did not want the Somali man to do their work. A man who told a non-Danish workmate "Clean these boots - you're so filthy inside, it doesn't matter", was overheard by the manager, who and took no action, and later promoted him; an ethnic minority lawyer was addressed as the cleaning lady by a senior partner in a prestigious law company; a black NIF activist who works in a technical library regularly hears his colleagues referring to NIF - (Network in the Unions) as "Niggers in the Unions". Many other such examples from personal experience were described to the interviewer.

Perceptions of union responses to discrimination

Respondents were asked whether and how the local trade unions responded to complaints of discrimination. Eighteen out of the twenty respondents could not describe in their own or any one else's experience one case of a trade union helping a victim of discrimination and starting the steps which might take the case to court. One NIF coordinator responded that most ethnic minorities "wouldn't even dream of complaining" because "unions had no idea how to handle the issues" - "Why do the battle? Because you know you are also fighting your own union". She reported that she had ethnic minority friends who, on the first day that they start a new job, encounter a barrage of racist comments. "And they will never go to their union and say 'Please help me with this' Never!"

This issue of union passivity on cases of discrimination was the main focus in two of the interviews. These were with two people who worked for the NGO in Copenhagen called the DRC¹⁰. In the absence in Denmark of an official body to advise and support victims of discrimination – such as the Commission for Racial Equality in the UK – the DRC is the main organisation which performs this role. The two DRC interviewees were asked to give examples from their files, going back over the last year or so, where unions had given positive support to their members in discrimination cases. They were also asked to provide examples where victims had *not* been supported by their unions and where there was a *prima facie* indication that such support should have been forthcoming. Just a few of the examples they described in detail have been summarised below.

There were a two recent cases reported by the DRC where a union had acted positively in support of its member. However, far more common in the DRC's files were cases where unions had failed to help their members. For example, there was the chocolate manufacturer who denied a woman a job because she was wearing a headscarf, and told the union representative that this was because the buyers – major supermarkets in England and Sweden - would not allow people wearing headscarves to pack their chocolate. This explanation by the company was so unlikely as to be ridiculous, but the union accepted this explanation and did not even bother to check whether it was true or not. A second case was that of a psychologist who was rejected for a position on the grounds that children would be unable to understand her Finnish accent. According to the DRC worker "she speaks with an accent but there's absolutely no problem in understanding her." A third case concerned a man who was given a new team leader at work, who gave the impression that he didn't like ethnic minorities. After he started, the company made redundant five or six people out of the eight people in his team, all ethnic minorities, and then afterwards began to hire Danes again. A fourth case was a cleaning employee who had been promised promotion, but his application failed, and one of the people who had been sitting on the appointment committee told him "The truth is that you are an ethnic minority and we don't like you".

Another case was that of a Romanian woman who was about to start work in a cleaning job at the Copenhagen studios of an international media company, who was telephoned and told that she could not have the job because she was foreign, and the

¹⁰ *Dokumentations- og Rådgivningscenteret om Racediskrimination*, the Documentary and Advisory Centre on Racial Discrimination

client thought she didn't talk Danish properly. According to the DRC respondent, "she speaks Danish very well, with an accent, but good enough to have a conversation on the telephone." Finally there is a case where a Danish man receiving treatment in a hospital called an Iranian doctor "an animal" and refused to be examined by her. Although the doctor and her colleague were ready to turn the man away, the Director of the hospital ruled that the man should receive treatment by another doctor acceptable to him. The Iranian doctor's professional association supported the hospital Director's decision.

In all of these cases, and many others on the DRC's files, the relevant union or professional association had failed to support their member, even after the DRC had contacted the union or association and asked them to take action. One area where it was felt the unions could do more in the recruitment phase is with regard to the 'policing' of job advertisements. The DRC regularly noted what appeared to be classic cases of 'indirect' discrimination in the stipulation of very high standards of Danish for jobs where they would seem to be unnecessary, particularly in the case of advertisements for cleaning jobs, which contained phrases such as "must speak and write perfect Danish" or "must speak and understand fluent Danish," or even "must have Danish citizenship". The important question for one DRC respondent was quite simply "why are the cleaning unions are not kicking up a fuss about this?"

In the opinion of one of the NIF coordinators, one of the reasons for union passivity in cases of discrimination at work was the complete lack of knowledge of union officials on how to handle a discrimination case. A DRC respondent confirmed that in his experience shop stewards were very unsure about topics like "what is racial harassment, where do you draw the line, what cases and examples are there, what can a shop steward do?" The cases that he knew of, where shop stewards had acted, were "because of their own personal motivation, but without knowing at all what to do, as they had not received any training on the topic".

Whilst this research was underway the Danish labour movement began a reorganisation of its central training arrangements, and the task of developing training courses on migration and integration has been given to one particular educational institute in Denmark. As part of this, this institute was planning to develop the "migration and integration" component within the general shop stewards' training course. In the light of the evidence that cases of discrimination were not being adequately addressed by the labour movement, it would seem to be an opportune time to provide shop stewards with the some of the skills and awareness to tackle this problem. However, when a white collar union official was asked whether the new training for shop stewards was going to include material on how to fight cases of discrimination, he replied "No, it is in general – using the labour market as a tool for integration in society". Another of the interviewees was one of those responsible for developing the training courses at this institute. When he was asked whether the shop stewards would be receiving any training on how to handle cases of discrimination, he replied "Not on such concrete issues. It's mostly about opening their minds to see people as they are, to look at their competences, and not their ethnic background".

Danish and British responses to diversity management

One noticeable difference between the Danish and British respondents was the their reaction to the relatively new organisational strategy of diversity management.

Diversity management is a practice which has now spread from the US and Canada to Europe. It emphasises the benefits of an ethnically and culturally mixed workforce, and stresses the importance of recognising cultural differences between groups of employees and making practical allowances for this in organisational policies, so as to produce a more creative and productive work environment (Kandola and Fullerton 1998).

In the Danish interviews, those who were aware of diversity management were strongly in favour of it, and saw it as the way forward in Denmark. The interview with the respondent who was responsible for designing and running the new training courses for trade unions shows that the language of diversity has become central to these courses – for example, he was planning training on topics such as ‘intercultural communication’, ‘diversity management’ and ‘the diverse working place’. He saw a main aim of these courses as “to get moving towards diversity in the workplace”, adding “I want to establish the foundation of diversity in everything we do here”. When asked if he was aware of any objections to diversity management within the Danish labour movement he replied “No I’ve never heard that. It’s not my experience”. Not all of the other Danish respondents had heard about diversity management, but even those who had never heard about it, when it was explained to them, thought that it sounded like a “good idea”.

In contrast, the interviews with the British trade union activists consistently revealed attitudes of scepticism or even outright hostility to diversity management. For example, a national officer with a major Civil Service union was very critical of the wording of an agreement with management which stated that the parties will support and value diversity. He felt that the emphasis on diversity “does nothing to challenge the basis of race discrimination.” The scepticism of the British interviewees towards diversity management is confirmed by other researchers. Greene and Kirton (2003) interviewed nine trade union officials holding responsibility for equality issues in seven British trade unions, plus the TUC. They also discovered a great deal of suspicion towards the managing diversity rhetoric, with the officials describing it as a “cover up” or as “window dressing”, and as detracting from the equality agenda. That such views are shared by many activists in British unions is indicated by the fact that at the 1997 TUC Black Workers Conference a motion was passed deploring and opposing the trend towards diversity management.

Therefore, we can identify a number of national differences in the stances of union activists. Whilst there is a clear awareness on the part of the majority of interviewees that racism and unjust discrimination are regular features of working life in both Denmark and the UK, and that ethnic minorities were not participating as much as they might in union life, the perception of what are the appropriate measures of response to this in Denmark is very different to that in the UK. The remedies that the Danish activists are pushing for are not those discussed by the British respondents, such as training shop stewards to deal with cases, policing racial harassment or incorporating new structures in the union to counter existing structures of exclusion. The measures that are being suggested in Denmark are those of gaining better “integration” through information provision, persuasion, campaigns and training for diversity. In contrast to the British activists, there was a very positive attitude to diversity management.

The power of the trade union movement in society

We will now consider some of the factors which might help us to understand these differences by looking at Penninx and Roosblad's four groups of factors. Penninx and Roosblad's first two categories – the power and structure of the trade union movement, and the condition of the economy at the time of a particular union stance – relate directly to the level of union power and influence in society. If a trade union movement is characterised by high membership rate and greater institutional power it would seem to be far better placed to campaign for, introduce and successfully implement strong ethnic equality measures than an institutionally weaker one. The state of the economy will accordingly increase or diminish this power at any particular moment. As Penninx and Roosblad put it:

in times of widespread unemployment the competition (whether actual or supposed) between indigenous and migrant workers could increase, making a trade union policy of inclusion much more problematic. In the same vein one might suppose that there is much more room for special measures for the improvement of the socio-economic position of immigrants, such as positive action, language courses, management training, and suchlike, in times of economic affluence (Penninx and Roosblad 2000: 14).

The high membership rate and institutionalised influence of the Danish trade union movement would suggest that they are in a much better position to introduce strong policies in support of their immigrant membership than their equivalents in the UK. In Denmark, unlike the UK, trade union membership has been rising up to the 1990s. In 1970 union density was 65 per cent; in 1994 it was 85 per cent. Over the same period that trade union density in Denmark was rising, in Britain it was falling. In 1979 trade union membership density¹¹ in Great Britain was 55.8 per cent; in 1998 it was 29.6 per cent (Waddington 2000: 585). The decline in union power in Britain over this period was due to two main factors. Firstly long-term economic restructuring, recession, and recalcitrant structural unemployment eroded the sectors which had traditionally provided the mainstay of trade union membership in the UK, and increased the proportional significance of sectors that are difficult to unionise. Secondly, the decline in union power was a deliberate policy aim of the Conservative governments which were in power from 1979 to 1997. By the end of 1993 nine pieces of legislation, including five Employment Acts, had considerably reduced trade union rights and functions (Smith and Morton 1993).

The paradox is that that the weakest labour movement should develop the strongest anti-discrimination activities. Since the 1970s the Danish unions have increased their membership and remained highly influential within the 'Danish model', whilst doing relatively little to combat ethnic discrimination. Over the same period unions in Britain have been increasingly marginalised from influence and seen their membership decline severely, yet there have been steady developments in anti-discrimination policies and activities. It seems that the political and economic forces which have undermined trade union power and influence in Britain have coincided with a strengthening of the unions' resolve positively in the direction of anti-racism and ethnic equality measures. As Virdee (2000) shows, during the 1960s and into the

¹¹ i.e. union membership expressed as a proportion of all employees, except those serving in the armed forces. The figures relate to Great Britain only, i.e. they exclude Northern Ireland.

1970s, when unemployment was low and British unions had a higher membership rate, more power and had achieved gains through collective bargaining, this was also a time when the unions were more 'exclusionary', and when racist practices by union members were relatively common. It was also a time when the TUC was supporting new Government immigration controls which were in themselves selective and perceived as racist. However, as union membership and power significantly declined, this was the precisely the time when parts of the union movement began serious agitation on the issue of racism and discrimination within the labour movement, and ethnic inequality in general.

parts of organised labour came to recognise that collective bargaining and exclusionary practices could no longer guarantee their economic security, leading them to support alternative strategies like strike action and those activists who advocated this type of action. Hence, rank and file workers rejected racism and engaged in 'inter-racial' class action on the grounds that working class divisions, including those created by racism, were harmful to the effective pursuit of their material concerns ... (Virdee 2000: 559-560).

Similarly, other authors see that the forces that have undermined trade union power in Britain have also produced a change amongst union leaders to take a stance *opposing* restrictive immigration measures. Avci and McDonald (2000) describe how since the mid-1990s a "central component" of the TUC's stand against discrimination has involved concerted opposition to both European and national moves to tighten immigration controls. They refer to conference motions by the white collar union NALGO (now merged into UNISON) opposing the internal policing of undocumented workers, and demanding an amnesty for unauthorised workers, the repeal of legislation which criminalizes them, and that all migrants and refugees be guaranteed legal status and have the right to live and work in any EU country.

Avci and McDonald argue that "this would appear to illustrate a new degree of solidarity with immigrant labour rather than the hostility that traditional interpretations of the situation would lead us to expect and which previously both employers and race-baiting politicians had been able to exploit. This is indicative of an important shift in the position of the unions" (Avci and McDonald 2000: 202-3). They conclude that, paradoxically, the forces which have weakened trade union power may have stimulated this change. In a situation of comparative strength, unions may not be so opposed to controls, such as could be seen in the 1970s. However, when unions are being weakened and undermined, and their legitimacy challenged, then issues of membership and recruitment, particularly in growing sectors of the economy and amongst unorganised groups, take on increased significance. "Legislation which threatens to hinder this is therefore likely to be resisted strongly both for ideological and self-interested reasons" (Avci and McDonald 2000: 206). Thus, it seems that factors within the first and second categories are relevant in ways perhaps not predicted by Penninx and Roosblad, with a greater level of activity by the weaker union movement at a more difficult time.

Differences in political discourse

One factor which Penninx and Roosblad mention in their third category is that of "public discourse", and this seems to be directly relevant to the national differences identified here. One defining difference between the political discourse in Denmark

and the UK is over the concept of multiculturalism. In Britain, political leaders will intermittently endorse this concept; in Denmark, not only is there no official political endorsement of multiculturalism, but it is more likely to be actively and vehemently opposed. In 2001 the British Foreign Secretary made a speech stating that the British are not a 'race' and Britishness cannot be defined in terms of race or ethnic background (see *Politiken* 28 April 2001). The speech was described in one newspaper as "one of the strongest defences of multiculturalism made by a Government minister" (*Guardian* 19 April 2001). In contrast, in 2000 the Danish (Social Democratic) Minister of the Interior felt the need to forcefully reassure the public that "Denmark will never be a multicultural society". This is in the context of what one observer has called the increasing "cultural racism" in Danish society, a racism which "can easily be framed within predominant discourses of a highly progressive welfare state, and in a country where relative sexual equality allows the demonisation of other 'backward' cultures in their midst which are perceived to oppress their women" (Wren 2001: 147).

The 2001 general election in Denmark was fought in a climate of anti-immigration rhetoric. In November a new government was formed, a minority coalition of the Venstre and Konservativ Folkeparti. Both of the parties which now form the Danish government campaigned on a platform of strengthening the legislation pertaining to immigration and integration. Following its election success, the new government closed down the Board for Ethnic Equality. This was the official body which provided advice on discrimination and ethnic equality to the Danish Parliament, the government, local authorities and firms. In the absence of an official complaints assistance body in Denmark, the DRC in Copenhagen stands as the main organisation for victims of discrimination to turn to. It is this body which provided many of the examples of cases referred to earlier in this paper. At the same time that the government closed the Board for Ethnic Equality it also withdrew the annual grant it had been providing to the DRC to enable it to operate this advisory role on discrimination cases, a grant which had formed 80 per cent of the DRC's income. The Danish Prime Minister justified these actions by labelling the bodies and those in them as "judges of taste" and "so-called experts" who were "attempting to repress the public debate with their expert tyranny".

As a minority coalition, the government bases its parliamentary support on the extreme Right Dansk Folkeparti, which gained 18 per cent of the vote, is highly nationalistic and wants to put an end to immigration. The leader of the Dansk Folkeparti advocates policies such as deporting the parents of immigrant offenders if they fail to control them (*Copenhagen Post* 25 – 31 May 2001), and advocates that the majority of foreigners in the country should be sent "home" immediately, and that those that remain should behave like Danes and not "act provocatively" by wearing headscarves (*Copenhagen Post* 1 – 7 June 2001). In the party's weekly newsletter she referred to Muslims as "people who lie, cheat and deceive" (*Copenhagen Post* 19 – 25 January 2001) and in a newspaper interview she stated "Denmark is a paradise for fanatics who, with human rights in hand, will turn Denmark into a multi-ethnic society" (*Jyllandsposten* 20. January 2002). In 2001 the youth wing of this party placed an advertisement in a student magazine showing three masked Muslims and proclaiming "Gang rapes, brutal violence, fear for your safety, suppression of women – this is what you expect from a multi-ethnic society" (*Copenhagen Post* 25 – 31 May 2001).

The Danish trade union interviewees talked of the impact that this kind of political discourse had on attitudes at a local level. One stated “I meet Danes everywhere who repeat ‘The Muslims are not our friends, they are only here to take Denmark over and make it Muslim, they are just pretending to be our friends’. The first time I heard this I thought the person was bonkers but now its everywhere.” This sort of thing made it very difficult for NIF activists to go out and debate these issues with ordinary union members. Several respondents recognised the taboo on the work ‘multiculturalism’. One Danish union activist said “I myself don’t use the word ‘multicultural’ – there’s a big resistance to it.” Another saw the problem with the word ‘multicultural’ was that it suggested that people didn’t accept the Danish culture and Danish way of living.

The discourse on multiculturalism helps to explain the Danish activists attitudes towards diversity management. In their desire to put clear water between themselves and the anti-multiculturalist rhetoric of the politicians, they strongly embraced both multiculturalism and diversity management. The British attitudes to diversity management arise in a very different context. There has been a long history of ethnic equality and anti-discrimination measures in UK unions, with some bitter struggles having been necessary before getting to a stage where reasonably strong equal opportunities, anti-racist and anti-discrimination policies have started to become accepted, both in the workplace and within the unions themselves (Wrench 1987). One reason why British activist are suspicious of diversity management is the fear that it might be a way of prioritising ‘soft’ rather than ‘hard’ equal opportunities practices. If a diversity management approach consists of little more than celebrating cultural diversity, it will sidestep many of the stronger elements which have existed within a broader equal opportunities approach, such as targets to produce a workforce which reflects the ethnic make-up of the locality, anti-discrimination training to modify the behaviour of white managers and employees, or strong internal anti-harassment initiatives. Furthermore, equal opportunities policies can contain strategies of positive action, such as extra training just for members of minority groups who are under-represented in management level positions. Yet some diversity management advocates are adamant that there is no place for such group based policies in a diversity management approach (Kandola and Fullerton 1998: 125). In this context British equal opportunities activists who have fought for positive action do not always see diversity management as welcome.

Thus in Britain, a multicultural diversity management approach is contrasted not with ‘anti-multiculturalism’, but with an alternative ethnic equality approach, namely equal opportunities with elements of positive action. People who have been active in equality struggles within the British trade union movement see a move to diversity management as a retrograde, not a progressive, step, in a context where there are already a great number of anti-racist, anti-discrimination and equal opportunities initiatives underway. In contrast, in Denmark, the lack of the union movement’s historical experience of such measures predisposes them to be more receptive to the idea of diversity management. In Denmark, the embracing of a multicultural philosophy by unions is progressive in the context of a national debate where politicians generate an ‘anti-multiculturalism’ assimilationist discourse. Furthermore, multiculturalism sits very well with diversity management.

Conflict and Consensus

Also falling into Penninx and Roosblad's third category is the context of the conflict and consensus models in society and their implications for trade union action against racism and discrimination. There is one way that it could be argued that the cooperative 'Danish model' indirectly *prevents* racism. Unlike many other EU countries, Denmark does not have a major problem of undocumented immigrants exploited in illegal work. Because in Denmark collective agreements play such a dominant role in the relationship between employer and employees, it seems that employers who attempt to violate the agreements by illegally using immigrants are effectively policed, not only by the unions but also by their own associations (Hjarnø 2003). In countries where large numbers of immigrants are illegally employed, such as Spain, their presence has been shown to stimulate racist attitudes amongst the local population. Thus we can say that this aspect of the Danish consensus model *indirectly* prevents the development of racism of this type.

However, it may be that a consensus and corporatist social model may also have some intrinsic weaknesses when it comes to anti-discrimination activities. This has been suggested by Graham and Soininen (1998) with regard to another country within the Nordic model, Sweden. They argue that it was precisely because of the cooperative and corporate nature of the Swedish industrial relations system that anti-discrimination measures came late in Sweden (in 1994). For 20 years beforehand it had been argued that because, in the corporate model, issues are best dealt with by the main labour market organisations, therefore ethnic discrimination is also a problem which should have an organisational solution rather than a legislative one. In a similar fashion, a law against employment discrimination in Denmark was resisted by senior union leaders in Denmark, and the law itself was passed even later than the Swedish one, in 1996. Prior to this there was no law in Denmark providing protection against racial discrimination in the labour market. The feeling by many up to this point was that such protection was not necessary because of the very particular traditions in Denmark which emphasise that such questions should be tackled in voluntary collective agreements between the industrial relations partners (Hjarnø 1995b).

The consensus way of working might also slow things down at a local level. In Denmark, the tradition of cooperation and consensus in industrial relations, the high density of union membership, and the emphasis on collective agreements means that employers are perhaps more sensitive to the views of their workforce than in many other European countries. This is reinforced by the fact that Denmark is a country characterised by many small and medium sized firms. By this interpretation, the consensus way of working might be a brake on the removal of barriers of discrimination at a local level because of the greater need of Danish employers to be sensitive to the attitudes of ordinary union members. And this has particular implications in Denmark because of the way that "ordinary union members" are exposed to a relentless anti-immigrant discourse from politicians and the popular media which legitimises grass-roots racism and perpetuates simplistic stereotypes about 'others', particularly if the 'others' are Muslims.

The consensus and conflict dimension can also help us to understand why Danish ethnic equality union activists see diversity management as a positive development to help to break down the barriers to equal employment that exist within the Danish labour market. Unlike in the UK, Danish unions are used to consulting with and co-

operating with employers far more in workplace agreements, and many large Danish employers themselves also welcome the development of diversity management at a time of globalising markets and demographic shortages. It is not insignificant that in Denmark, the main trade union confederation, the LO, plus some of the larger Danish trade unions, are members of *Foreningen Nydansker*, an organisation set up in 1998 by a number of human resource managers from several large Danish businesses with the aim of setting a 'positive agenda' in the business community regarding diversity practices in employment.

Characteristics of the ethnic minority membership

Penninx and Roosblad's fourth category was the characteristics of the immigrants themselves. There are certain relevant differences here which could have implications for the emphasis of union policies on training, and on union participation. The UK's post-war labour migrants came primarily from ex-colonies, and many were familiar with or fluent in the English language, and familiar with British social institutions. In Denmark, this was not so, and thus language and other training for immigrants was seen to be a more important element of union policies than in the UK.

Both the British and Danish equality activists were concerned to address what they saw as a low participation rate of ethnic minority members in union activities. However, their interpretations of the reasons for this were different, as were their remedies. This can also be partly explained by differences in the character of the first generation immigrants in each country. Denmark has taken in a much greater proportion of refugees than the UK, with typically less previous experience of union activities than the post-war labour migrants to the UK. As one Copenhagen respondent observed "You often find that refugees are afraid of union involvement because of their past experiences. They will pay the fees but they don't ask any questions about it. Some of them even thought the union fee was some sort of protection money for the local mafia." This is different compared to the general background of post-war migrants to the UK, where it seems there was a ready motivation to join the unions based on their earlier experiences. Many of the British post war migrant groups came from colonies where trade unions were not only active but were based on the British model (sometimes with the help of unions in Britain). In some cases these unions themselves were the locus of anti-colonialist struggles. Therefore many immigrants already had experience of unions and a natural expectation that they would join them and be active when in Britain.

These difference feed into the conflict and consensus models with regard to union reactions. In Denmark, if immigrants are seen not to participate in union activities and positions, it is diagnosed as a problem of 'awareness', both on the part of the immigrants and of the union officials themselves. The Danish interviewees felt that local union officials did not realise that special encouragement was often needed to break down the barriers that kept ethnic minorities from participating. In the opinion of one NIF member, the attitude amongst many officials remains that "everything must be OK because immigrants have exactly the same rights as we do". Thus NIF activists were in effect addressing the old, minimalist "equal treatment" stance, still found at the local level within unions. Their response is to persuade the union officials to make special encouragement to immigrants to come to meetings and participate, and to educate the immigrants on the importance of union involvement.

In the UK, if ethnic minority members are not becoming active in union work and positions, it is more likely to be assumed that this is a structural problem rather than a problem of awareness. Therefore, the response is that structures within the union must change, and structures of discrimination must be addressed. Thus, in the UK, activists were doing more than simply encouraging ethnic minorities to participate in the union, but were making changes in the structures of unions in order to facilitate this increased participation. In the 1970s and 1980s, research in the UK had shown that one reason there were so few black shop stewards was that a black worker who felt that racism was a feature of the work environment would be less likely to take on a position which entailed making "personal sacrifices for the collective good" (Phizacklea and Miles 1980: 125). Also, black workers reported that at union meetings they felt that their issues were being excluded because of the apathy of the white majority (Lee 1984: 12). This was seen as the fundamental problem of being a minority in an organisation run by majority interest. Thus in the British context the solutions seen as necessary for improving minority participation in unions were firstly, to tackle workplace racism and secondly, to develop special structures within unions which would enable black voices to be heard.

Conclusion

We have concluded that in understanding the very different Danish and British approaches to the issue, it is factors which fall into Penninx and Roosblad's third category which seem to be of particular significance. Whilst factors in the other categories are also relevant, they are often so in a surprising way. Categories one and two relate to factors which determine the power of a trade union movement to realise its own agenda. The Danish trade union movement is characterised by a far higher membership rate, and a far greater degree of political power and influence than its British counterpart, yet this seems to be inversely related to the intensity of union activity against discrimination. The British trade union movement, already weak in comparison to Denmark, started to adopt stronger stances in favour of immigration and against racial discrimination at a time when the state of the economy and labour market was making it even weaker. With regard to category four, there are differences in the backgrounds of the immigrant populations in the two countries relevant to union policies, such as in their natural pre-disposition to join or be active in a trade union, and this affects the emphasis of union policies for increasing participation. However, another significant difference is the fact that, unlike in the UK, the Danish immigrant population is predominantly Muslim, and this feeds into one of the most important factors under category three, namely a far more racist and extreme anti-Muslim discourse by political leaders and the media, which in the Danish 'consensus' context has a tremendous effect on the character of trade union activity.

The Danish trade union activists' opposition to politicians' crudely assimilationist, anti-Muslim and anti-multiculturalism discourse tends naturally to point them towards a positive view of multicultural policies and diversity management. Hence many of the unions' new initiatives put the emphasis on educational campaigns, and the provision of information. New union training courses emphasise diversity, respect for cultural difference, and the breaking down of barriers to communication problems. Diversity management fits well into the consensus way of doing things, with more emphasis on discussion, cooperation and agreements rather than legislation and regulation. However, while the Danish activists emphasise this type of measure, they do not embrace the forms of anti-racism and anti-discrimination activities seen in the

UK, such as self-organisation structures for black and ethnic minority members within unions, positive action measures such as special training for minorities who are under-represented in union positions and reserved seats on executive bodies, as well as the policing of discrimination, with active policies against verbal and physical racial harassment and practical assistance for members who have been victims of discrimination. These measures fall more easily into a ‘conflict’ frame of reference.

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