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SEVENTH PERIODIC REPORT OF THE KINGDOM OF DENMARK CONCERNING THE INTERNATIONAL COVENANT ON CIVIL AND POLITICAL RIGHTS

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SEVENTH PERIODIC REPORT OF DENMARK CONCERNING THE INTERNATIONAL COVENANT ON CIVIL AND POLITICAL RIGHTS

Introduction

1. This report is submitted in pursuance of article 40 of the International Covenant on Civil and Political Rights (ICCPR), which entered into force in Denmark 6 January 1972. The report is organized in conformity with the new optional reporting procedure which Denmark accepted 2 March 2011.
2. The report deals with changes in legislation and legal and administrative practice relating to the material provisions of the Covenant made since the Government of Denmark (hereinafter ‘the Government’) submitted its sixth periodic report (CCPR/C/DNK/6), with reference to the latest list of issues (CCPR/C/DNK/QPR/7).
3. The Kingdom of Denmark is the Contracting Party to the ICCPR. The Faroe Islands and Greenland are, however, separate jurisdictions in certain matters hence there are separate reports from the Faroe Islands and Greenland in relation to the review of the implementation of the obligations under the Covenant in the Faroe Islands and Greenland. These reports thus reflect the views of the Faroese and Greenlandic authorities.
4. The Kingdom of Denmark’s approach to implementation of the Covenant is guided by a commitment to democratic accountability, proportionality, and equal protection under the law. The civil society was invited to submit comments to the report prior to submission.

A. General information on the national human rights situation, including new measures and developments relating to the implementation of the Covenant

Reply to LoI Para. 1

Discrimination due to disability - Concluding observations recommendation 14

5. The 2018 Act-on-Prohibition-of-Discrimination-of-Persons-with-Disabilities prohibits both public and private service providers to discriminate a person due to a disability. The prohibition covers both direct and indirect discrimination in addition to harassment and reprisals. The Act also contains a right of reasonable accommodation in early childhood education and care and primary schools.
6. Anyone who has experienced discrimination due to disability has the option to file a complaint with the Board-of-Equal-Treatment. The Board can award compensation but not issue fines.
7. If the Board rejects a case, the complainant is informed that the Danish-Institute-for-Human-Rights (DIHR) may reopen cases of principle or public interest. The Board also automatically informs DIHR. Individuals can seek legal guidance from the Discrimination-Helpline at DIHR, which can also assist in preparing and lodging complaints with the Board.
8. An annual report is compiled with information from the Board-of-Equal-Treatment. According to the 2024-evaluation of the Act-on-Prohibition-of-Discrimination-of-Persons-with-Disabilities, most people are aware that discrimination on the grounds of disability is illegal, though knowledge of the Act itself is limited.

Partner violence - Concluding observations recommendation 20

9. In the period 2021–2024 DKK 24.3 million was allocated to an early intervention for victims of violence and perpetrators of intimate partner violence, hereunder to training programmes for professionals in the use of risk assessment tools to assess citizens’ risk of being exposed to and perpetrating violence.

Non-refoulement

10. The-Danish-Immigration-Service (DIS) applies the principle of non-refoulement as a fundamental element of the asylum procedure. Compliance is ensured through an individual and thorough assessment of each case, including all relevant risk factors upon return to the applicant's country of origin. Upon arrival, all asylum seekers are offered an initial medical examination by a trained healthcare personnel. During this first medical examination, the applicants are asked about possible physical or mental problems, e.g. chronic disease or if an asylum seeker has been subject to torture. DIS is attentive towards any signs of torture or vulnerability that may affect the case and can refer the applicant for a torture assessment.
11. Tolerated stay applies in situations where an applicant falls within the scope of section-7 of the Danish-Aliens-Act, but is excluded from obtaining a residence permit due to exclusion grounds. As a result, the applicant receives a final refusal of residence, yet deportation cannot be enforced due to the principle of non-refoulement. Tolerated stay does not constitute a residence permit but allows the applicant to remain in Denmark on a temporary basis under specific conditions. Restrictions related to tolerated stay, and any residence or reporting obligations are based on statutory provisions. Such measures pursue legitimate aims, including migration control and public order and they are implemented in a manner that seeks to ensure compatibility with the Covenant.
12. Decisions by DIS in which it is assessed that an applicant would qualify for international protection, but is excluded from such protection and therefore is granted a tolerated stay, are subject to appeal to the Danish-Refugee-Appeals-Board. DIS is also legally obliged to review cases of tolerated stay twice a year, or earlier if specific circumstances warrant it. The purpose is to determine whether the conditions for enforcing deportation under section-32b of the Danish-Aliens-Act are now met.

Reservations

13. There are no current deliberations on the withdrawal of the Danish reservation to articles-10(3), second-sentence, 14(1), (5) and (7) and article-20ⁱ.
14. The reservation to article-10(3) is considered in line with article-37(c) of the Convention-on-the-Rights-of-the-Child, which provides that juveniles under 18 may be deprived of liberty only as a measure of last resort, and in such cases may be placed with adults solely when, in the individual case, it is assessed to be in their best interests.
15. In Denmark, 15-17-year-olds are generally placed in institutions outside the Prison-Service, unless compelling law enforcement considerations require detention within prison facilities.
16. In 2025, an average of 18.5 (the number includes both convicted persons, pre-trial detainees and detainees and foreigners) juveniles were held in Danish prisons and remand centres.
17. Denmark has a dedicated juvenile unit at Søbysøgård-Prison, comprising both open and closed sections, and a youth unit in Copenhagen-Prison (remand) where the juveniles are generally placed. Female prisoners aged 15-17 may, after individual assessment, be placed in Jyderup-Prison (women's prison).
18. Complete separation of all juveniles from adults in all cases could require placements far from home, contrary to the European-Prison-Rules-(para.17.1), and could hinder gender-specific support or create social isolation for the juvenile.

Greenland

19. Since 2015, several developments have taken place regarding human rights in Greenland. Noteworthy is Inatsisartut's (The Parliament of Greenland) adoption of the Act-on-Equality-and-Anti-Discrimination in 2024.ⁱⁱ The-Human-Rights-Council-of-Greenland continues to promote awareness and protection of human rights. There has also been increased political focus on for instance the case of a group of Greenlandic children sent to Denmark in 1951, as well as on the Contraception Case, which concerns a large number of Greenlandic women and girls who, from the 1960s until today, have received contraception without their informed consent or knowledge, cf. paragraph 115.

B. Specific information on the implementation of articles 1 to 27 of the Covenant

Constitutional and legal framework within which the Covenant is implemented (art. 2)

Reply to LoI para. 2

Implementation of ICCPR into Danish law

20. ICCPR is implemented into Danish law in accordance with the dualistic legal tradition and through noting “harmony of norms”, and legislative proposals are assessed for their compliance with Denmark’s international obligations.
21. On the basis of an expert committee’s report, which was sent into public hearing, covering positive and negative implications of incorporating UN human rights treaties into Danish law, the Government decided in 2014 not to incorporate any of the UN-treaties. It was assessed that incorporating the ICCPR would add only limited value due to its substantial overlap with the ECHR, and concern was raised that incorporation might shift the decision-making from the legislature to the courts. The committee’s members did not reach consensus in this matter.

Danish Courts application of the Covenant

22. It appears from journals on jurisprudenceⁱⁱⁱ that Danish courts have expressly applied provisions of the Covenant in five decisions 1 January 2016 to 1 January 2026.
23. In 2017, the Supreme-Court examined the authorities’ denial of citizenship to a person unable to learn Danish because of a PTSD diagnosis under article-14-in-the-ECHR, article-26-of-the-ICCPR or article-1 in conjunction with articles-2-4-5-of-the-CRPD. The Supreme-Court reached the conclusion that the claimant had not proved that his inability to learn to speak Danish was caused by his PTSD and thus found no infringement of the ECHR nor the ICCPR.
24. Judicial awareness of the Covenant is supported through the general human rights training provided within the Danish courts’ continuing education programmes. Relevant training activities regularly address core human rights standards contributing to judges’ knowledge of and ability to apply e.g., the ICCPR.

Deportation cases and expulsion

25. In regards to ensuring access to an effective remedy in the event of a violation of the Covenant in deportation cases, aliens may only be expelled in pursuance of a decision reached in accordance with law. The decision shall determine whether the alien must be expelled pursuant to section-26(2)-of-the-Aliens-Act, which stipulates that an alien shall be expelled unless the expulsion would for certain be contrary to Denmark’s international obligations, including under the ICCPR.

Amendment of the Aliens Act

26. In 2018, the Danish Parliament amended section-32(5)-of-the-Danish-Aliens-Act. This implies that the Danish courts can impose a shorter re-entry ban in connection with an expulsion if a longer re-entry ban would mean that expulsion would certainly be contrary to Denmark’s international obligations.
27. In 2022, the Danish Parliament amended section-50-50a-and-50b-of-the-Danish-Aliens-Act. These imply that upon a subsequent review of an expulsion order, the Danish courts may impose a shorter re-entry ban, if the courts find that this is necessary to maintain the expulsion within the frames of Denmark’s international obligations. Furthermore, it implies that the Danish courts, in a compulsory subsequent review in connection with a change of a sentence to treatment, must re-assess an expulsion order and re-entry ban due to significant changes in the alien’s overall circumstances.
28. In January 2025, the Government amended its Executive-Order-on-Visas. Where an applicant provides evidence that they have been subject to a re-entry ban under section-32(5)(1)-of-the-Aliens-Act, the Danish visa authorities

must consider their ties to Denmark, whether they belong to visa main group 5, and whether refusal would violate their right to private life in pursuant to Article 8 of the ECHR.

Guidelines of the Director of Public Prosecutions

29. The Guidelines of the Director-of-Public-Prosecutions^{iv} contains a publicly available section on expulsion. The guidelines state that the ICCPR contains a number of rights corresponding to those in the ECHR, and describe the role of the Human-Rights-Committee (CCPR). The guidelines further note that the committee has issued statements in a number of cases concerning expulsion as a result of crime. The Ministry of Justice is not aware of case law where the Danish courts have expressly applied provisions of the ICCPR in regards to the decision on expulsion.

Reply to LoI Para. 3

National Human Rights Institution

30. The-Danish-Institute-for-Human-Rights is mandated to promote and protect human rights in line with the international principles governing National-Human-Rights-Institutions. As Denmark's national equality body, the institute also promotes equal treatment without discrimination on grounds such as gender, race, ethnic origin and, with the implementation of the EU-Directives on equality bodies, also religion or belief, disability, or age. To ensure adequate funding for the effective fulfilment of this mandate, the Institute's budget allocation is annually reviewed and adjusted as required, e.g. in 2011 following the transfer of responsibilities related to monitoring the UN-Convention-on-the-Rights-of-Persons-with-Disabilities and the mandate as national equality body, and most recently in 2026 in order to strengthen the institute's efforts to promote equal treatment and combat racism against Greenlanders in Denmark. The bylaw of 6 October 2023^v establishes the procedure for the removal of the institute's board members. In accordance with the Danish legal tradition on functional immunity, the Institute considers the current protection adequate. For further information see the reporting on the Faroe Islands.

Non-discrimination (arts. 2 and 26)

Reply to LoI Para. 4

Non-Discrimination Legislation

31. In 2021, Denmark amended the non-discrimination legislation to strengthen the protection of LGBTI persons against discrimination, hate crimes and hate speech. The-Act-on-Gender-Equality^{vi} was amended to include an explicit prohibition against discrimination on the grounds of sexual orientation, gender identity, gender expression, and sex characteristics. The-Act-prohibiting-Discrimination-in-the-Labour-Market^{vii} was amended to include an explicit prohibition against discrimination on the grounds of gender identity, gender expression, and sex characteristics in addition to sexual orientation. Further, the Criminal-Code^{viii} was amended by explicitly referring to disability, gender identity, gender expression and sex characteristics in addition to sexual orientation as grounds of protection against hate crimes and hate speech. Acts based in full or in part on disability, gender identity, gender expression and sex characteristics were also added to the list of circumstances, which normally must be considered aggravating circumstances, when determining a sentence^{ix}.

The Criminal Code for Greenland

32. In relation to Greenland, a draft law is currently underway, which aims to revise section 100 of the Greenland-Criminal-Code, which outlaws discrimination and stipulates the protected grounds of discrimination, including disability, gender identity, gender expression, and sex characteristics. The law revision was passed by the Greenlandic parliament (Inatsisartut) 13 May 2026.

Board of Equal Treatment

33. The Act-on-the-Board-of-Equal-Treatment^x was amended to extend the mandate of the Board, so it explicitly includes complaints concerning sexual orientation, gender identity, gender expression, and sex characteristics.
34. Every year the Board-of-Equal-Treatment prepares an annual report about the number of cases received, rejected complaints, the distribution of cases regarding the different protected grounds etc. The number of cases has been

stable over the past years. The report shows that there were 657 complaints received in 2020, 486 in 2021, 512 in 2022, 548 in 2023 and 506 in 2024^{xi}.

Protection of LGBTI persons

35. Since 2018, Denmark has provided funding for LGBTI action plans with concrete initiatives to promote the safety, well-being and equal opportunities for LGBTI persons. The action plans have ensured a comprehensive and coordinated effort across the Government to address the issues that LGBTI persons face. The Government presented its third national action plan in January 2026 for the period 2026-2029 with 30 initiatives.

Hate crimes

The Director-of-Public-Prosecutions has issued public available guidelines on hate crimes, (c.f. Reply-to-LoI-Para-5).

36. Furthermore, the Danish-Institute-for-Human-Rights has established a dialogue forum on hate crime and discrimination, bringing together relevant authorities, civil society, the Director-of-Public-Prosecutions-and-the-Police.

Combating discrimination against persons with disabilities

37. The Danish-Disability-Council informs the public on how to combat discrimination, stereotypes and stigmatization against persons with disabilities, while emphasizing the skills of persons with disabilities and how they contribute to society^{xii}.
38. In 2023 the Danish-Disability-Council examined the general populations knowledge about and perception of persons with disabilities:
- 57 pct. of the population believe that persons with disabilities are limited in, or do not have any, opportunities to finish an education or be employed.
 - 82 pct. of the population find it important that everyone in Denmark have equal opportunities for education and employment.
 - 7 out of 10 believe that the majority of the population feels insecure around persons with disabilities.
39. This knowledge will be used by policy-makers, companies, organizations and the general population to combat discrimination, stereotypes and stigmatization.
40. The 2024 Framework-Agreement between the Government and several political parties also included a new national disability week, the first carried out in November 2025, and an information and awareness raising campaign; both carried out by the umbrella organization Disabled-People's-Organisations-Denmark.

Vulnerable Living Areas

41. A political agreement was reached in 2021 to change the term “ghetto” used to designate disadvantaged residential areas in the legislation to “parallel societies” and “areas of transformation”. This change reflects an altered approach to addressing the challenges associated with disadvantaged residential areas. It entails a greater emphasis on inclusion, integration, and improving living conditions. The purpose of the legislation is to ensure an average mix of residents in vulnerable housing areas and to ensure that all persons in Denmark, regardless of their background, will have the same level of opportunities in life.

Reply to LoI Para. 5

National-Action-Plan-to-Combat-Hate-Crimes-and-Racism

42. Through the National-Action-Plan-against-Racism concrete initiatives in order to deflate the amount of hate crimes has been ensured.^{xiii}
43. The Danish Government attaches great importance to combat hate speech against LGBTI persons. The national action plans focus on preventing hate crimes against LGBTI persons and funds are allocated to establish a service

offering counselling, support and guidance to LGBTI persons who have been subjected to hate crimes or hate speech.

44. All parties in the Danish Parliament in 2024 agreed on new legislation that enables the police to designate enhanced penalty zones for hate crimes in advance of an upcoming event, if the event is expected to lead to an extraordinary increase in the number of such crimes. Furthermore, the Danish-National-Police is granted the authority to define enhanced penalty periods if an incident is followed by an extraordinary development in hate crime. Within these zones or periods, the penalty for hate crimes may be increased by up to 50 percent.
45. The establishment in 2025 of coordinators for combating Antisemitism and hate crimes in the Copenhagen-Police-District are to be followed by the establishment in 2026 of coordinators for combating hate crimes in all police districts.

Public Prosecution Service

46. The Danish-Director-of-Public-Prosecutions has issued public general guidelines and online information regarding hate crimes, including a description of the course of a criminal case and information on a victim's rights to a legal advocate. Furthermore, the Director-of-Public-Prosecutions has issued general guidelines on hate crimes in the Guidelines-of-the-Director-of-Public-Prosecutions. The guidelines were updated 27 March 2025. The guidelines are publicly available and include a description of relevant investigative steps to be taken by the police as well as an obligation for the prosecution service of the local police districts to refer all provisional charges for violation of section-266b in the Criminal-Code (hate speech) to the regional state prosecutor with a view to decide whether to press formal charges.
47. The Danish-Prosecution-Service is responsible for two public national databases on case law regarding hate speech and on case law where the courts have increased the sentence according to section-81(6)-of-the-Criminal-Code. The purpose is to provide a better understanding of such cases and additionally, prosecutors and defence attorneys can use the databases for case preparations.

The Police

48. The Danish-National-Police and the Director-of-Public-Prosecutions have an institutionalized ongoing dialogue regarding hate crimes with a number of significant stakeholders representing minorities to establish a closer cooperation with the stakeholders and get more victims to report hate crimes and to highlight any difficulties or barriers regarding the reporting process. As a result of the dialogue, the information leaflet "Advice-and-Guidanceto-persons-who-work-with-victims-of-hate-crimes" was published in 2022. In 2024, the Danish-National-Police reached out to the community of people from Greenland in Denmark and Action-Aid-Denmark.
49. In an initiative covered by The-National-Action-Plan-against-Racism, an NGO supporting ethnic minorities has been provided a direct grant to implement an initiative in order to monitor and counter racism on social media.
50. There is already a ban on discrimination based on ethnicity in Danish legislation. Public authorities, are subject to a number of basic principles of administrative law. For example, the principle of equality, which implies, that authorities must not engage in unfair discrimination, and applies, for example, when the police carry out administrative activities, including when the police conduct searches and other interventions against citizens.
51. In recent years, there has been a strong focus on the issue of ethnic profiling in police training e.g. the topics of discretion, legitimate and illegitimate profiling and discrimination. The aim is to enable students to distinguish between legitimate profiling, based on police-related and legal factors, and illegitimate profiling, based on unethical criteria. This approach to police discretion, legitimate profiling and discrimination is also a common feature in relevant supplementary courses offered by the Police Academy.
52. Hate speech and other racist behavior committed by employees within the Danish-Police is unacceptable and could result in a disciplinary sanction, including dismissal in the most serious cases. All police employees are covered by internal guidelines on good behavior and the framework for lawful speech^{xiv}.

53. Complaints about possible hate speech or other racist behavior by a serving police officer are investigated by the Independent-Police-Complaints-Authority, which can either criticize the behavior or press charges. It is standard procedure for the Danish-National-Police to subsequently assess whether there is a basis for a disciplinary sanction, including dismissal.
54. The Danish-National-Police continuously monitors disciplinary cases, including cases of hate speech and other racist behavior. If an increase in the number of cases or a change in trends or patterns is observed, it will be considered whether there is a need to intensify efforts to prevent hate speech etc. among police employees.
55. Reference is made to Reply-to-LoI-Para-20 regarding the Action-Plan-against-Antisemitism.
56. The following table provides an overview of the prevalence of hate speech and hate crimes in Denmark:

Year	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	Total
Criminal offences in total	159	228	218	277	309	303	340	476	525	554	3364
Criminal offences concerning hate speech	55	48	68	100	122	112	100	172	181	224	1155
Incidents without charges and other investigative measures	115	218	231	292	326	218	147	268	352	353	2522
Total number of hate crimes	274	446	449	569	635	521	487	744	877	907	5886

Source: 2016-2024 Danish National Police annual reports on hate crimes, 2025 Danish National Police. Please note that the data for individual years are not directly comparable, as both the legislative framework and the registration practices have changed over the course of the period.

57. Criminal offences regarding hate speech are regulated under Section-266b-of-the-Danish-Criminal-Code according to which any person who publicly, or with intent of dissemination to a wide group, issues a statement or other communication threatening, humiliating or degrading persons of a particular group because of their race, color, national or ethnic origin or religious faith or their handicap or sexuality, gender identity, gender expression or gender characteristics is sentenced to a fine or imprisonment for a term not exceeding two years. If the hate speech has the character of propaganda, it must be considered a particularly aggravating circumstance in the sentencing.
58. Furthermore, according to Section81(6)-of-the-Criminal-Code, at the determination of the sentence it must generally be included as an aggravating circumstance that the act has a background in full or in part in the ethnic origin, religion, disability, sexual orientation, gender identity, gender expression and gender characteristics or the like of others.
59. See Annex 1.1 for data relating to section-266b and section-81(6) of the Criminal-Code.

Racism and discrimination against Greenlanders

60. In recent years there has been greater attention to racism and discrimination against Greenlanders. There has also been debate about discrimination in social cases, leading Denmark to change certain practices in assessments of Greenlandic families to better consider cultural and linguistic differences. The Danish government presented an action plan in February 2025 with 12 initiatives to combat racism against Greenlanders in Denmark. Furthermore, 12 additional initiatives were presented in June 2025.

Gender Equality (arts. 2, 3, 25 and 26)

Reply to LoI Para. 6

Gender-Segregated Labor Market

61. The Employee-and-Competence-Agency (the state employer authority in Denmark) participates in a partnership with the Danish-Trade-Union-Confederation, the Confederation-of-Danish-Employers, the Association-of-

Municipalities-in-Denmark (KL), and the Danish-Regions, which aims to identify the underlying causes of the gender-segregated labor market, with a view to fostering ongoing dialogue and developing recommendations and practical tools. A report has been produced, including an action catalogue and inspirational case studies on efforts to improve gender balance at selected workplaces. Recommendations include a focus on gender diversity in education, recruitment processes and expanding gender diversity in work environments. The report is expected to be followed by a series of related activities.

Equal Pay Legislation

62. The Danish Government is preparing a revision of the Equal-Pay-legislation in light of the EU-Directive-on-Pay-Transparency.^{xv} The Danish social partners are closely involved in the revision through their participation in the Implementation Committee under the Danish Ministry of Employment and Gender Equality. The Implementation Committee is a standing forum where the social partners, representing both employees and employers from the private and public sectors, meet to discuss the implementation of EU-labour-law. In this forum, they have been asked to present their joint analysis and recommendations for the implementation of the EU-Directive-on-Pay-Transparency into Danish legislation. This work is still ongoing.

Gender Equality in Politics and Decision-Making

63. Both women and men need to be represented in politics and involved in decision-making processes at the local, regional and national level. It is hence encouraging that, across several elections, there has been an increase in the proportion of women serving on municipal councils, as well as a rise in the number of women holding mayoral positions. At the latest municipal council elections in November 2025, 37 pct. of the elected members were women. In 2021, women accounted for 35.9 pct. and in 2017, women accounted for 33 pct. of the seats. The number of female mayors at the latest election were 27 (27.55 pct.) in opposition to 21 female mayors (21.43 pct.) after the election in 2021. At the latest regional elections in November 2025, 50,75 pct. of the elected members of regional councils were women, which is a slight increase compared to the elections in 2021 with 50,24 pct. women. However, all four regional chairmen are men.
64. In the Danish parliamentary elections held in March 2026, there was an increase of women elected from 39.1 pct. in 2019 elections to 48 pct. The new Danish Government of 3 June 2026 consists of 11 women and 10 men, making this the first majority-female government in Danish history. The Prime Minister, MS Mette Frederiksen, is serving her third term as Prime Minister for Denmark.

Gender Equality in Management and Boards in the Public Sector

65. In January 2023, legislation from 2019 was strengthened with the aim of supporting efforts to promote a more equal gender composition in management and boards in the public sector. Data on the gender composition in public institutions, e.g. will every second year be collected and published in order to follow the development and create greater transparency for the public.

Sexual Harassment

66. The Government landed a tripartite agreement with the social partners in March 2022 on combatting sexual harassment in the workplace, which contains 17 initiatives, including 8 legislative proposals on compensation for victims of sexual harassment and the clarification of the responsibilities of the employer. An Alliance-Against-Sexual-Harassment was established, which aims to promote lasting cultural change by maintaining focus on the prevention of sexual harassment and anti-harassment initiatives particularly in the workplace and in society at large. The Minister of Gender Equality is heading the Alliance consisting of social partners and civil society.

Gender Equality in the Private Sector

67. By Act-no.-1383-of-23-December-2012, rules on the underrepresented gender were introduced requiring the largest Danish companies and companies in the financial sector to set a target figure and develop a policy to increase the proportion of the underrepresented gender in their supreme governing body.
68. The Danish parliament strengthened the rules by Act-no.-568-of-10-May-2022 meaning that companies are also required to set a target figure for the proportion of the underrepresented gender at the company's other management

levels. The company must therefore, no later than at the first meeting of the supreme governing body, ensure that a target figure is set for the other management levels.

69. The Danish Parliament adopted the Gender-Balance-Act-no.-1602-of-17-December-2024 on gender distribution among management members in certain large publicly listed companies, which implements the directive (EU)2022/2381 of the European Parliament and of the Council of 23 November 2022 on a more balanced gender distribution among management members in listed companies and related measures. The rules entered into force in Denmark 28 December 2024 as a supplement to the existing Danish rules regarding the underrepresented gender and a company can only be subject to one set of rules.
70. The Gender-Balance-Act sets out requirements for targets and policies for the gender composition of the management of certain listed companies.
71. The scope of the Gender-Balance-Act constitutes, that public limited companies whose shares are admitted to trading on a regulated market within the European Union are covered by the Gender-Balance-Act, except for companies with fewer than 250 employees and which in a financial year do not exceed an annual turnover of 50 million euros or an annual balance sheet total of 43 million euros.
72. The Gender-Balance-Act differs from the previous rules on the underrepresented gender in the following areas:
 - Changed definition of equal gender distribution.
 - Fixed target figure for equal gender distribution in the supreme management body.
 - Means for achieving equal gender distribution in the supreme management body for companies that have not achieved equal gender distribution by 30 June 2026.
 - Disclosure and changed reporting requirements.
73. In the Gender-Balance-Act, the equal gender composition means that a distribution of 40/60 pct. of women and men respectively, or the number that comes closest to 40 pct. without exceeding 49 pct.
74. It is enforced in the Danish rules, that listed companies, that do not have an equal gender distribution in the supreme governing body by 30 June 2026 or after election to the supreme management body, must establish or adjust the company's existing process for selecting candidates for nomination for election to the supreme management body.
75. In the Gender-Balance-Act Denmark has introduced penalties in the form of fines, compensation and cancellation of employee-elected members if listed companies do not comply with the Gender-Balance-Act.
76. The listed companies that are covered by the Gender-Balance-Act have to report yearly to the Danish-Business-Authority in the company's annual account regarding their achievements to reach the goals laid out in the-Gender-Balance-Act.

Violence against women, including domestic violence (arts. 3, 7 and 26)

Reply to LoI Para. 7

Services and rights for victims

77. Danish municipalities are obliged by law to offer temporary accommodation in a crisis shelter for individuals (and their children) who have been subjected to violence in close relationships. During their stay, they receive care and support. This obligation includes persons with disabilities.
78. In 2020 the Danish Parliament passed a bill obligating the municipalities to offer a maximum of 10 hours of free psychological treatment to all persons who stay in a crisis shelter. The sessions are offered both during and in continuation of the stay at a crisis shelter. Furthermore, the municipalities are obligated to offer psychological treatment to children accompanying their parent during their stay.
79. The Danish health system provides all victims of violence with free, relevant medical treatment, including mental health services. The support system is multidisciplinary and aims to ensure safety and help women recover and build a life free from violence. There are Centres-for-Sexual-Assault/Victims-of-rape, who provide specialised, free, and

confidential support to individuals who have experienced rape or attempted rape. The services are multidisciplinary and available without referral or police reporting.

National action plans and initiatives

80. As a supplement to Denmark's permanent efforts to combat violence in intimate relations, several initiatives and national action plans have been launched since 2002. Action plans are coordinated by the Ministry of Employment and Gender Equality in close collaboration with relevant ministries and civil society.
81. Covering the period 2019–2022 a national action plan focused on the criminalization of psychological violence, alongside initiatives to strengthen preventive efforts, ambulatory support for victims, targeted measures addressing dating violence among young people, and treatment programs for perpetrators. DKK 101 million was allocated to the initiatives in this plan.
82. In 2023 the government launched a 'National-Action-Plan-to-Combat-Intimate-Partner-Violence-and-Intimate-Partner-Killings-2023-2026' that features 26 initiatives, based on knowledge on intimate partner violence, including international research on the 8 steps in a partner killing of women. The action plan directly acknowledges that women are disproportionately affected by intimate partner violence and homicide, and highlights the need to address the societal stigma surrounding violence within the home. A total of DKK 233.8 million has been allocated in the period from 2023-2026 and thereafter DKK 37.9 million annually. The plan focuses on strengthening prevention, early identification, and support for victims of violence, their children, and perpetrators of violence.
83. In 2025, the Danish Government launched an action plan to improve the safety of young people in the nightlife. The ten initiatives in the action plan includes criminalization of stealthing, a grant programme on education and awareness-raising for youth on the consent-based rape provision, and a study of the extent and nature of "drugging" in nightlife. The Danish government intends to continue its efforts in a new long-term strategy on intimate partner violence and intimate partner killings.
84. The organization Lev-Uden-Vold receives funding for various initiatives aimed at strengthening efforts for victims of violence. This includes a national hotline, legal counselling, and an overview of available places at crisis centers. The organization has also received funding for a telephonic counselling initiative for perpetrators of violence.
85. Furthermore, substantial funds have been allocated to different initiatives in order to strengthen the out-patient services for victims of violence. Two national organizations, Danner (crisis center for women) and Mødrehjælpen (Mother's-Aid) also receive permanent operational funding through the national budget in support of their out-patient services for women, who are victims of domestic violence.
86. Since 2019, the Danish-Stalking-Center has been given permanent operational funding through the national budget. Funding is allocated to support a nation-wide outpatient service providing telephone counselling, social and legal guidance, and professional psychological treatment to both individuals affected by stalking and those who engage in stalking.
87. In 2017, shelters were included in the mandatory reporting scheme to Statistics-Denmark. The data are used for national statistics, planning, and as a basis for political decision-making. All women's shelters (and later also shelters for men) are required to report data on: number of stays, residents and accompanying children, length of stay, occupancy and capacity.
88. As part of the national action plans, the University-of-Southern-Denmark has since 2005 carried out a national survey on the prevalence and characteristics of intimate partner violence as well as other types of violence. In 2026 the survey will include all forms of intimate partner violence as covered by the Istanbul convention as well as honour-related conflicts.

Initiatives regarding the prevention of violence against children

89. In 2024 the Danish Government established a working group on violence against children. The focus has been on recommendations for prevention, detection and treatment of children exposed to violence with a DKK 10.0 million allocated for implementation. On the basis of these recommendations from 2025, a political agreement was reached

to allocate funding for, among other things, a pilot project on anonymous counselling for individuals at risk of perpetrating violence.

In 2025, the Danish Government presented “Safe-Childhood-an-action-plan-with-18-initiatives-against-violence-against-children-and-domestic-violence”, which includes an initiative to strengthen the Children’s-Houses by providing a financial boost to enhance staff professional expertise. The action plan also allocates funds to establishing a pilot project with a Family-Justice-Center in Denmark, where families who are victims of intimate partner violence can receive coordinated support from different agencies.

90. Under the 2026-2029 agreement on the reserve for measures within the social, health and employment sectors, funding was allocated to support a campaign on violence through the Children’s-Helpline^{xvi} and to provide skills development for professionals.

Strengthened law enforcement response

91. Denmark must ensure that law enforcement respond promptly and appropriately to violence covered by the Convention by providing protection to the victim, prevent violence, and ensure protection through preventive operational measures and the collection of evidence (*Istanbul-Convention-articles-50-51*).
92. The Danish Police consider violence against women a serious gender equality issue. As mentioned above, a number of initiatives have been implemented under the national action plan, for which dedicated funding has been allocated.
93. Resources have been allocated to enhance the knowledge- and evidence-based development of policing. In 2021, the police have developed a diploma-level training programme called, “Violence and Trauma in complex cases” developed with Danish women’s rights organisations such as “Danner” and The-Danish-Stalking-Center.
94. In 2021, specialised interdisciplinary teams were established in all police districts to improve handling of cases involving intimate partner violence and stalking. The teams identify cases, initiate preventive measures, and conduct risk assessments in serious cases to ensure victim protection.
95. As part of the efforts to prevent violence against women, the financial framework (2026-2030) allocates about DKK 240 million to strengthen the police’s handling of vulnerable victims and to establish a commission on intimate partner homicides. There is also increased focus on cross-sectoral cooperation to improve identification, prevention, and victim support and protection.
96. On 1 July 2025, “Electronic Monitoring” was introduced on a trial basis in Denmark, enabling selected police districts to require perpetrators of violence or stalking to wear electronic monitoring devices as a supplement to restraining orders.

Legislative changes in the Criminal Code

97. The Danish-Criminal-Code does not contain gender-specific provisions on violence. Instead, violence is criminalised through the following sections: Section-216 (rape, including consent-based rape), Section-237 (murder, including femicide), Section-242 (stalking), Section-243 (psychological violence), Section-244-245 (violence), Section-245 a (female genital mutilation) and Section-246 (violence of a particularly aggravated nature/resulting in death). Sections-242-243 were introduced in 2022 and 2019.
98. Victims are provided with a range of protective and support measures, including shelters, social and legal counselling, healthcare and treatment programs for perpetrators.
99. In February 2026, new legislation doubled penalties for aggravated violence and increased the penalties by 50 percent for simple violence committed in close relationships, for female genital mutilation and cases of rape, where violence or threats are used, including rape by assault and gang rape. See annex 1.2 for data on gender-based violations.

Prevention of domestic and partner violence in the Faroe Islands

100. In September 2023 the Government of the Faroe Islands published an action plan regarding domestic and partner violence. The action plan included 20 different initiatives to prevent domestic and partner violence. 1 January 2024

stalking and psychological violence was included in the Faroe-Islands-Penal-Code. The Faroese Police have been unable to provide statistical data on this issue.

Prevention of domestic and partner violence in Greenland

101. The Greenland-Police regularly participate in various preventive initiatives and seminars and performs the secretariat function for the Greenland-Crime-Prevention-Council and assists the government (Naalakkersuisut) in the development of the National-Strategy-to-Combat-Violence-in-Close-Relationships.
102. Furthermore, the Greenland-Police established a Specialized-Team with the aim of strengthening the quality of the police's handling of cases involving violence in intimate relationships, including stalking and similar offenses.
103. In the context of preventing domestic violence and violence against women, the Specialized-Team focuses on establishing contact with individuals involved in cases of domestic unrest or violence. The team also provides guidance to victims regarding reporting options and the implications of filing a police report. In addition, the Greenland-Police advise victims of violence on available support services. The Specialized-Team maintains close collaboration with shelters for women and children in Greenland.
104. Moreover, the Greenland-Police have established a Sexual-Offences-Section, which handles cases of abuse, including cases involving children.
105. The Greenland-Police have not been able to extract disaggregated data on gender-based violence, specifying the number of complaints, investigations, prosecutions, and convictions, as this would require an extensive manual review of all cases of gender-based violence reported to the Greenland-Police during the period 2016–2025.

Prevention, early identification and addressing gender norms

106. Although Greenland does not have a stand-alone national strategy specifically targeting violence against women, several measures under the *Action-Plan-on-Violence-in-Intimate-Relations* address prevention and early detection.
107. Alliaq, the national treatment and counselling initiative, works both with perpetrators and potential perpetrators in order to prevent violence before it occurs. Furthermore, the Greenland-Police has established a specialized unit that monitors daily incident reports to identify patterns and repeated violence and forward cases to relevant authorities. The same unit provides trauma-informed training to police officers, enabling them to respond safely and professionally to victims at the scene.
108. In general, Naalakkersuisut has a specific focus on dismantling negative male ideals and stereotypes that can contribute to keeping men and boys in rigid gender-stereotypical patterns. By working to break with harmful masculinity ideals and gender stereotypes, and by expanding the social and cultural frameworks of what it means to be a real man or a real woman, Naalakkersuisut believes this contributes to the prevention of gender-based violence. Work is continuously being done to break taboos, remove responsibility from the victim, and to ensure that the frameworks for easy access to help are in place.

Facilitation of reporting and access to justice

109. Measures to encourage reporting include efforts to reduce stigma around violence and sexual abuse, public awareness campaigns, and strengthened trauma-informed practices within policing. These approaches aim to create a safer environment for victims to come forward and to ensure that victims encounter trained personnel familiar with the dynamics of violence and trauma.
110. Greenland continues to work on removing barriers to help-seeking, making information more accessible, and ensuring that victims know where to obtain assistance. However, challenges remain in encouraging reporting, particularly in cases involving intimate partners or family members.

Prosecution, sanctions and compensation

111. Victims in criminal law cases concerning rape and sexual assault are most often women. The Greenland-Police's overall annual statistics for criminal law case decisions in 2025 show that 47 pct. of criminal law cases did not end

in convictions but were discontinued. Measures to strengthen trauma-informed policing and to improve cooperation between authorities aim to support better case processing, although this remains an area of ongoing concern.

Disaggregated data on gender-based violence

112. Below is available disaggregated prevalence data. Judicial data such as the number of complaints, investigations, prosecutions, convictions and imposed penalties are held by the Danish Ministry of Justice.

Topic	Women / Girls	Men / Boys	Source
Experienced violence or threats (lifetime)	>50 %	>50 %	SDU
Violence in the past year (ages 25–34)	11 %	–	SDU
Physical violence – youth	10.7 %	5.9 %	Greenlands Gender Equality Council
Sexual abuse – lifetime	34 %	15 %	Greenlands Gender Equality Council
Violence by partner/family/acquaintance (adult women)	70 %	–	SDU

Voluntary termination of pregnancy, and sexual and reproductive rights (arts. 6-8)

Reply to LoI Para. 8

Right to abortion

113. On 1 June 2025, new legislation on abortion entered into force allowing hospitals and abortion clinics to terminate pregnancies up to a limit of 18 weeks. In addition, minors above the age of 15 have a right to terminate their pregnancy without prior parental consent. Furthermore, a national abortion council was established, replacing the former regional abortion councils. After the limit of the first 18 weeks of the pregnancy, the woman can request The-Abortion-Council for a permit to terminate the pregnancy due to certain explicitly defined reasons, e.g. if the fetus suffers from a severe illness, if the pregnancy or caretaking would cause a significant burden to the woman due to her social, economic or physical circumstances, or if the pregnancy is a result of a sexual assault.

114. According to The-Abortion-Council's annual report, the Danish-Abortion-Council received 157 abortion requests between 1 June and 31 December 2025. Of these, 136 were approved. Most requests were based on fetal medical indications, meaning that the fetus had a medical condition. During this period, 121 requests were related to fetal medical indications, while 27 were based on social indications concerning the woman's personal and social circumstances. The remaining requests were related to factors such as the woman's health and development.

Contraceptive practices in Greenland

115. In 2025, an independent investigation into contraceptive practices that started in the 1960s collected testimonies from 354 women describing a total of 488 episodes. The women's testimonies show that the vast majority of the women who have given testimony do not believe that they consented to the contraception they received. Nor do the majority feel that they were properly informed prior to being given contraception. In August 2025, on behalf of Denmark, the Prime Minister gave an official apology to the affected women. In December 2025, the Danish Government and a broad majority of the Danish Parliament concluded a political agreement to establish a compensation scheme for the affected women. On 27 August 2026, the Parliament passed a bill establishing the compensation scheme which entered into force 1 September 2026. The Government of Greenland has launched a separate human rights investigation, which was published 28 August 2026.

Reply to LoI Para. 9

The Climate Act

116. In 2020, the Danish Parliament adopted a legally binding Climate-Act to mitigate the severe impacts of climate change, which sets a long-term target for Denmark to be climate neutral by 2050 at the latest (net-zero greenhouse gas emissions). The new Danish Government has affirmed the former Government's intent to formally enshrine into the Danish-Climate-Act a more ambitious climate neutrality target to 2045 and add a new target of 110 pct. reduction in 2050 compared to 1990-levels. This will come into effect pending formal approval in Parliament of a complementary update to the Climate-Law.
117. According to the Climate-Act, a new reduction target must be set every five years for a ten-year timeframe. In line with the provisions in the Paris-Agreement, such target cannot be less ambitious than the last target set in order to avoid backsliding. The Climate-Act sets a target of reducing greenhouse gas emissions in Denmark with 70 percent by 2030 compared to 1990 with an indicative target for 2025 of a 50-54 pct. reduction of emissions compared to 1990-levels. The new Danish government has proposed to increase the domestic target for 2035 from 82 pct. to at least 85 pct. reduction of emissions compared to 1990-levels.

Climate Policy

118. The Climate-Act also contains an annual cycle of work for Danish climate policy that obliges the incumbent Danish Government to work towards meeting the targets of the Climate-Act. One of its key elements is the annual Climate-Program, where the responsible Minister must provide Parliament with an assessment of the likelihood of reaching the national climate targets.
119. Legislative proposals are in general sent for public hearing and published online before they are presented in the parliament^{xvii}. The purpose of the publication is to provide digital access to legislative proposals to interested citizens, businesses, etc. to create transparency in the legislative process.
120. The legislative drafting work in Denmark includes impact assessment guidelines with specific sections on the climate and environmental impacts of the proposed legislation. If relevant, the legislative proposals should include a complete description and assessment of the climate and environmental consequences of the proposed legislation. The climate and environmental impact assessments concerns both legislative proposals whose primary purpose is to influence the climate and environment and proposals that have other purposes but which may have derivative consequences.

National Climate Partnerships

121. The Government recognizes that achieving the targets requires a whole-of-society approach with involvement of citizens, municipalities, trade unions, civil society, academia and the private sector. To this end, the Danish Government established fourteen Climate-Partnerships representing Danish private sector organizations, who have provided more than 400 recommendations for the green transition.

EU Climate Law

122. During the Danish Presidency of the Council of the European Union in 2025, a provisional political agreement was reached to revise the EU's-Climate-Law resulting in the adoption of a target of 90 pct. reduction of emissions in 2040 compared to 1990-levels. The amendment to the Climate-Law entered into force in April 2026. The Danish Parliament has been involved in forming the Danish position on the proposal in accordance with the national EU decision-making procedure. The EU-Climate-Law already includes a commitment to achieve climate neutrality in the EU by 2050.

International climate negotiations and partnerships

123. Combating global climate change is the responsibility of all nations. Although Denmark only account for approximately 0.1pct. of the global greenhouse gas emissions, Denmark is determined to provide a vision and direction for ambitious climate action and to inspire other countries to not only increase ambition but to demonstrate the solutions needed to meet increased ambition. In the UNFCCC climate negotiations, Denmark negotiates through the EU, wherein Denmark stands for leading by example by raising ambition through ambitious climate goals and action. Additionally, Denmark currently has bilateral energy partnerships with countries representing more than 70-pct. of global CO₂ emissions, where Danish experts support partner countries' achievement of the Paris-Agreement objectives.

Greenland

124. Greenland acceded to the Paris-Agreement 2 July 2024. In this context, the Government of Greenland has initiated the drafting of a national climate strategy that will include climate goals and adaptation measures and set the direction for Greenland's contribution to the green transition while respecting the rights of Indigenous Peoples. The process utilises a bottom-up model that ensures extensive involvement of citizens, civil society, businesses and public actors. A series of public meetings has been held in larger and smaller towns and settlements, inviting all citizens to share their experiences of climate change and propose solutions. The Greenlandic business community is also involved in the process through multiple climate partnerships across sectors such as energy, transport, and fisheries. Here, businesses can contribute their experience, identify barriers to the transition, and propose sector-specific carbon-reduction initiatives.

Reply to LoI Para. 10

Suicide prevention

125. In 2024 the Danish Government, together with all parties in the Danish parliament, agreed on a national action plan for suicide prevention which aims to decrease the number of suicides by 33 pct. in 2030. With the plan the parties have agreed to gradually increase the funding of suicide prevention.

126. Since 2015 the suicide rate has dropped 4pct. In 2024, 580 committed suicide which correspond to 9,7 suicides pr. 100.000 citizens in Denmark. The suicide rate is significantly higher for men (14.2) than women (5,3).

	2020	2021	2022	2023	2024
Denmark total					
Women	5,8	5,2	4,8	5,1	5,3
Men	14,3	13,6	14,9	13,0	14,2
Capital Region					
Women	6,0	6,6	4,4	4,9	4,7
Men	13,2	10,5	13,6	13,1	10,7
Central Denmark					
Women	5,9	5,0	4,2	5,2	5,3
Men	14,2	15,8	15,4	10,5	13,7
North Denmark					
Women	4,8	3,4	5,1	5,1	5,1
Men	15,1	15,5	15,8	14,7	16,7
Zealand					
Women	4,5	5,0	6,2	4,5	4,9
Men	13,9	15,1	14,8	13,5	17,0
Southern Denmark					
Women	6,6	4,3	5,1	5,8	6,6
Men	15,7	14,1	16,0	14,3	17,0

Table 1: The table shows the suicide rate, calculated as the number of suicides per 100,000 inhabitants in the period 2015–2024, broken down by gender and region. Suicides are calculated based on the date of death, and the population figure is measured as of January 1 of the relevant year via the CPR register. The calculation of suicides is based on the Cause of Death Register, which contains data from death certificates for individuals with a valid Danish CPR number and permanent residence in Denmark. Region of residence and gender are determined at the time of death.

Regarding Prevention and Reduction of Suicide

127. Naalakkersuisut launched in 2023 “Qamani-strategi-for-forebyggelse-af-selv mord-2023-2028” which constitutes the current national framework for suicide prevention in Greenland and outlines four key areas of action:
- Access to support services
 - Citizen involvement
 - Safety and well-being in schools and youth education programs
 - Reducing stigma
128. The strategy is based on the principle that suicide prevention is a shared responsibility across society. Therefore, the initiatives are not carried out solely within the framework of the strategy itself, but also through cross-sector collaboration between departments and professional fields, as the risk factors for suicide includes social conditions, substance abuse, violence, and other issues that cut across sectors.
129. The strategy is anchored within Paarisa, the Prevention-Unit-of-the-Government-of-Greenland working on social and health issues, which holds the coordinating responsibility for its implementation. A steering committee has been established to monitor progress and support the execution of the focus areas, which has recently been reorganized to strengthen decision-making and increase effectiveness.

Ongoing or completed initiatives

130. Since the launch of the strategy, several initiatives have been introduced or carried out, including:
- Training of suicide-prevention instructors in collaboration with Center-For-Folkesundhed-in-Greenland and Livslinien. These instructors are trained to deliver suicide-prevention courses within their local communities.
 - Launch of the Qamani-app in December 2025. The app includes tools such as safety plans, exercises, conversation guides, and an overview of available support services. By January 2026, it had approx. 1,500 users.
 - Expansion of Tusaannga.gl in cooperation with Børns-Vilkår to make the service more suitable for young users.
 - Delivery of suicide-prevention training courses for relevant professional groups.
 - Implementation of the Yellow-September awareness campaign over a two-year period.
 - Increased communication on mental health through Paarisa’s social media channels.
 - Introduction of an alcohol code of conduct for young people.
 - Initiation of a nationwide mapping of actors and services working with suicide prevention to improve coordination across the country.

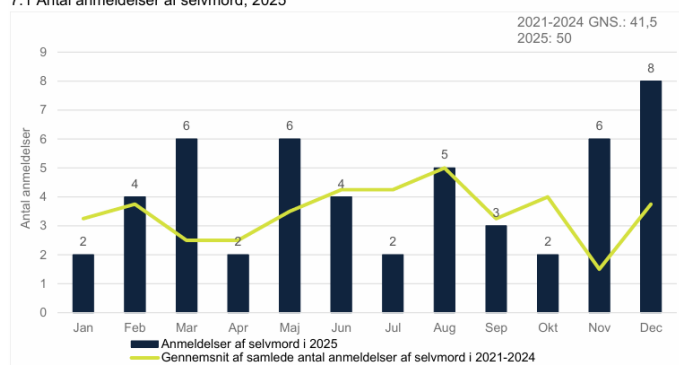
Services and support for people at risk

131. Tusaannga is a nationwide, 24/7, free counselling service where individuals can seek anonymous support either by phone or in writing through Tusaannga.gl. The service also supports children and young people and provides guidance and assistance to those in need. Inulervik, Greenland’s national therapy and counselling center, offers therapeutic treatment to citizens - available in person, online, and by phone. Some local communities provide municipal crisis response services as well as family centers, that offer open counselling and support. Individuals at risk of suicide can also seek appropriate treatment through the healthcare system.

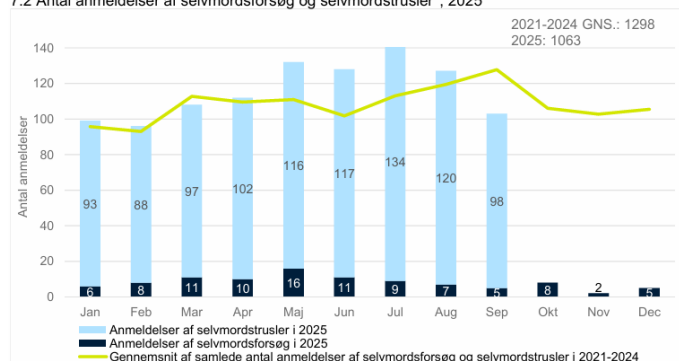
Monitoring and Data

132. The implementation of the strategy is monitored in collaboration with the Center-for-Public-Health-in-Greenland. The Ministry of Children, Youth, Families and Domestic Affairs, including Paarisa, does not itself collect registry data on suicide or suicidal behaviour. Official data on suicides, suicide attempts and suicide threats are published by the police. The most recently available figures for 2025 are provided below.

7.1 Antal anmeldelser af selvmord, 2025



7.2 Antal anmeldelser af selvmordsforsøg og selvmordstrusler*, 2025



*Fra og med september til december har Grønlands Politi ikke systemunderstøttelse til at trække data på selvmordstrusler, hvorfor disse ikke er retvisende.

Source: Politiets Årsstatistik 2025

Prohibition of torture and other cruel, inhuman or degrading treatment or punishment (arts. 7, 9 and 10)

Reply to LoI Para. 11

Solitary Confinement

133. As regards solitary confinement, section-770a-770e-of-the-Danish-Act-on-Administration-of-Justice contains rules about solitary confinement during pre-trial detention (remand).
134. The Director-of-Public-Prosecutions has issued general guidelines on solitary confinement during pre-trial detention in a separate section of the Guidelines-of-the-Director-of-Public-Prosecutions. The Guidelines contains an overview of the temporal limits for solitary confinement during pre-trial detention and a description of the conditions for use of solitary confinement during pre-trial detention. It appears from the guidelines that according to section-770b(1)-of-the-Act-on-Administration-of-Justice solitary confinement during pre-trial detention may only be applied if the objective cannot be achieved by less invasive measures, if the intervention is not disproportionate to the importance of the case, and if the case is being processed with the necessary speed. It also appears from the guidelines that according to section-770b(2)-of-the-Act-on-Administration-of-Justice solitary confinement during pre-trial detention can only be used in relation to minors (persons under 18-years-of-age) if very special circumstances that make solitary confinement necessary exist. The guidelines also contain a description of the conditions for prolonging solitary confinement during pre-trial detention and establishes that a prolonging of solitary confinement during pre-trial detention beyond the normal temporal limits always must be submitted to the Director-of-Public-Prosecutions. The guidelines are publicly available.
135. The-Director-of-Public-Prosecutions annually prepares a report on the use of solitary confinement during pre-trial detention, including the use of solitary confinement of minors. In the period between 2016-2025 the number of persons held in solitary confinement during pre-trial detention has been declining from 34 in 2016 to 4 in 2025. Over

the past five years the use of solitary confinement has ranged between 0-7. Solitary confinement of persons under the age of 18 was last used in 2017.

136. Voluntary exclusion from association can be arranged for different reasons, for instance to protect the inmate, or if the inmate needs time on their own to focus on an issue or to adapt to their current situation. The inmate can, at any time, end the voluntary exclusion. It follows from written instructions that it must be continuously assessed in cooperation with the inmate if the voluntary exclusion can be terminated. Furthermore, the prison staff will continuously assess whether the inmate should be transferred to another prison where association is possible.
137. It is noted, that The-Danish-Prison-Service is currently working on joint guidelines regarding voluntary exclusion from association.
138. On 1 January 2025, an amendment to the Danish-Criminal-Code came into force, explicitly criminalising i.a. torture, genocide, crimes against humanity, war crimes, and the crime of aggression
139. The prohibition on torture (section-118-I-of-the-Danish-Criminal-Code) corresponds in content to the definition of torture in Article-1(1)-of-the-UN-Convention-against-Torture, with a few adjustments.

Greenland's Criminal code

140. There is currently no distinct offence of torture under Greenland's-Criminal-Code. However, acts that resemble torture are legally treated as violence, which is criminalized in section-88-of-the-Greenland-Criminal-Code.
141. In line with the recommendation by the Committee-Against-Torture (CAT) as part of the concluding observations on the eighth periodic report of Denmark, the Government of Greenland (Naalakkersuisut) has requested to revise the Criminal-Code so as to include a specific provision to criminalize torture as a distinct offence. The Government of Denmark is planning to include this in the next revision of the Greenland-Criminal-Code.
142. It should be noted that Article-3-of-the-ECHR on the prohibition of torture applies to Greenland.

Torture and treatment of detainees

143. There have been improvements in the treatment of detainees in Greenland. In 2019, a new prison in Nuuk opened, allowing more prisoners to serve their sentences in Greenland instead of Denmark. International bodies and the Ombudsman also monitor detention facilities to ensure that prisoners are treated in accordance with human rights standards and to limit the use of solitary confinement.

Treatment of persons deprived of their liberty and liberty and security of the person (arts. 9 and 10)

Reply to LoI Para. 12

Measures taken to improve conditions in places of detention

144. The Danish-Prison-Service strives to maintain a separation between convicts and remand prisoners. However, overcrowding and lack of prison staff entail that the prison service, in certain situations, may be unable to maintain a separation. Furthermore, a convict may be placed in a remand prison as part of a disciplinary transfer or for individual reasons. In this context, and in light of the specific situation of remand prisoners, work has been initiated by the Danish Prison Service aimed at assessing and, where relevant, improving conditions for remand prisoners.
145. In December 2025, the Director-of-Public-Prosecutions has, on the basis of an analysis regarding pre-trial detention (remand) made in 2024, issued four new tools in order to ensure that pre-trial detention is only being used when it is necessary and in the shortest time possible.

Measures to promote the use of non-custodial alternatives to detention

146. As regard to "non-custodial alternatives to detention", the Guidelines-of-the-Director-of-Public-Prosecutions contains a description of relevant rules in section-765-of-the-Danish-Act-on-Administration-of-Justice regarding non-

custodial alternatives to detention (“fængslingssurrogater”). It appears from the guidelines (and section-765(1)) that if the purpose of a pre-trial detention can be achieved by less invasive measures, the court can decide on the use of such measures instead of pre-trial detention. It also appears from the guidelines that if the conditions for pre-trial detention are fulfilled and it is the assessment of the prosecution service and the police that the purpose of a pre-trial detention can be achieved by less invasive measures, the prosecution service has to request the use of such measures.

147. In 2026, the Administration-of-Justice-Act was amended.^{xviii} The act contains 4 initiatives with the aim to promote the use of non-custodial alternatives to detention and to reduce the duration of pre-trial detention: (1) increased use of electronic monitoring as an alternative less invasive measure; (2) the introduction of a new time limit of four weeks from the bringing of charges to the commencement of the trial, when the suspect is held on remand; (3) shorter maximum time limits for continuous periods of pre-trial detention before stricter requirements for continued detention apply; and (4) easier access to court hearings on the preservation of evidence which may have a bearing on the lifting of pre-trial detention.

Denmark’s plan to establish detention facilities outside its territory

148. The Treaty between The Republic of Kosovo and The Kingdom of Denmark on the use of the Correctional Facility in Gjilan for the purpose of the execution of Danish sentences^{xix} entered into force 24 June 2024. The authorities of the two countries are currently planning the implementation, in accordance with article-4 of the treaty, through a cooperation agreement regarding the functioning of the prison, the staff, the facilities, the transport of prisoners, and other tasks that may be carried out.
149. Kosovo-Correctional-Service (KCS) will carry out necessary renovations and repairs of the prison so that the conditions in the prison fundamentally correspond to those in Danish prisons, and comply with Denmark’s international obligations.

Prison overcrowding

150. For a number of years, the Danish-Prison-Service has been challenged by a high number of inmates. In periods, it may be necessary both to place two inmates in a cell intended for one person, as well as to use common rooms and visitor rooms for accommodation. Situations involving two prisoners in one cell is generally managed on a voluntary basis.
151. In order to address the capacity challenges, the Penal Reform from 2025 includes a number of initiatives, which intend to alleviate the shortage of prison and remand prison capacity in both short and long term as well as to ensure enough staffing. The-Danish-Prison-Service is preparing to expand the capacity with more than 2,000 cells, including 300 cells in Kosovo, during the next 10 years. With these capacity expansions, it is expected that the overcrowding can be reduced in the long term.

Measures to monitor respect of the human rights of inmates

152. According to article-5 in the treaty, Danish rules and regulations shall be exclusively applicable to the execution of Danish sentences in the prison, including the rights and duties of the prisoners.
153. Under article-13 in the treaty, the Governor shall be in charge of the prison. The governor shall be responsible for the proper execution of Danish sentences, maintaining order and security, and the treatment of prisoners within the prison in accordance with the Danish-Execution-of-Sentences-Act. Furthermore, under article-14, the governor shall authorise and be responsible for the use of direct force against prisoners, including the use of measures of restraint in accordance with the Danish rules and regulations.
154. The Danish-Prison-Service is currently planning and organising training in Danish penal enforcement practices for both uniformed and civilian Kosovar staff at Gjilan-Prison.
155. As per article-19(2)(a) in the treaty, the Danish-Prison-Service will establish inside the prison a health (including dental) care unit staffed by authorised Danish health care personnel.
156. Under article 30 in the treaty, international bodies, such as the European-Committee-for-the-Prevention-of-Torture-and-Inhuman-or-Degrading-Treatment-or-Punishment, authorised to conduct announced and unannounced visits to

the prison. These inter-national bodies shall be granted access to information and be allowed to interview prisoners to the greatest extent possible.

157. Danish authorities that are competent to deal with complaints, legal actions and/or supervision such as the Parliamentary-Ombudsman may conduct inquiries in the prison and during transport, transfer and health care treatment.
158. These authorities shall enjoy the same powers as under the rules and regulations of Denmark, including access to relevant locations and information, written statements from the prison and the right to interview prisoners and staff in accordance with the Danish rules and regulations.

Reply to LoI Para. 13

Treatment of persons deprived of their liberty and liberty and security of the person

Psychiatric Institutions

159. Denmark maintains a significant commitment to reducing the utilization of coercion within psychiatric care. The most recent comprehensive political agreement from May 2025, which is the final step of the Danish comprehensive 10-year-plan for mental health care towards 2030, has the purpose of ensuring the necessary capacity and quality of care for psychiatric patients. The aim of the political agreement is also to contribute to the new and ambitious goal to reduce coercive measures by 30 pct. by 2030. This goal includes belts, restraints and forced medication with a particularly focus on young people and children.
160. One of the initiatives in the political agreement is the introduction of new coercive measures of a less intrusive nature in order to reduce the use of the most intrusive forms of coercion, especially the use of belt fixation. One example is the possibility to tell patients to go to their patient room for a shorter period of time (without the door being locked). The new measures are based on recommendations from the Danish-Health-Authority. The Mental-Health-Act has to be changed in order to implement the new coercive measures of a less intrusive nature. According to the political agreement the changes are expected to come into force by 2027.

Right to Self Determination of People with Disabilities

161. In June 2024, the Danish Parliament adopted an amendment of the Act-on-Social-Services, regulating the use of force and other interventions in the right to self-determination, towards persons with a substantial and permanent mental impairment including persons with disabilities living in residential accommodations. The amendments are intended to support staff in ensuring appropriate care for a group of citizens who are unable to care for themselves. The options for use of force available to caretakers has therefore been increased, while continuing to safeguard the citizens' legal rights. The provisions are based on a clear framework limiting the use of force to a strict minimum by underlining the right to self-determination and that the use of force and other interventions may never be used as substitutes for socio-pedagogical assistance and only be done to ensure the person's care, dignity and safety or to meet the needs of the community at the housing or day care facility or the needs of others. The provisions also include regulations with regards to the rights to appeal as well as registration of the use of force. The later was eased with the latest amendments.

Prevention of Sexual Assaults Towards People with Disabilities

162. In 2023, an agreement on measures on the social, health and labor market sectors the Government and all other parties in Parliament agreed to prioritize DKK 4 million in 2024-2027 to the prevention of sexual assault towards adults with disabilities. Through the dissemination of knowledge and competence development of the staff, the project will provide managers and employees with tools to both prevent and handle sexually offensive behavior for adults with disabilities.
163. People with disabilities who have experienced sexual assaults in their childhood or youth can seek counseling and support from various providers and civil society organizations. The Danish Government have increased the financial support for some of these organizations notably over the past couple of years, including DKK 20 million in additional support each year to the Center for victims of sexual abuse who provides specialized treatment and counseling for people who have experienced sexual abuse in their childhood and youth.

Improve conditions in psychiatric institutions

164. The Naalakkersuisut Ministry of Health and Persons with Disabilities informs that, in hospital institutions, the daily focus is on the use of the Brøset-Violence-Checklist (BVC)^{xx} in relation to hospitalized patients. In the long run, the focus will be expanded to include all patients, in order to take preventive measures and reduce the risk of violence and threats.
165. The initiatives also include increased cooperation with the Region-of-Central-Jutland in Denmark on competence development, for example through courses for nursing staff on the gentle use of force and de-escalation techniques.
166. Furthermore, the initiatives include strengthening the working environment by employing a working environment consultant, coordinating training initiatives, and supporting the training and future employment of security assistants in the psychiatric field, as well as further work on research into patient treatment. A new psychiatric building will also improve the physical framework, including single rooms, increased bed capacity, and the division into a secure ward, an open ward, and a children–youth–family ward.
167. In Greenland, the Act-of-Parliament (Inatsisartut-Act) regulates the use of coercive measures towards children and young people,^{xxi} on the use of coercion within the social sector. The purpose of the Act is to protect children in residential care institutions and to ensure that coercive measures are used only in exceptional situations and only by the professional staff of the institutions.
168. The Act is accompanied by a guidance document that explains the rules in further detail, as well as a Director’s Instruction issued by the Residential-Care-and-Placement-Authority.
169. Each institution has its own internal guidelines and plans on how to handle situations in which the use of coercion may become necessary.
170. These regulations constitute the framework for limiting the use of coercive measures and ensuring that alternative measures always be used first.
171. The Naalakkersuisut Ministry of Health and Persons with Disabilities also informs that, regarding social care institutions for persons with disabilities, instructions and guidelines have been introduced to prevent and combat sexual violence against persons with disabilities living in social care institutions.

Trafficking in persons (arts. 8 and 24)

Reply to LoI Para. 14

172. Denmark is committed to prevent and combat human-trafficking through prevention efforts, prosecution of traffickers, and targeted support for victims. Since 2002, the Danish efforts to combat human-trafficking have been anchored in interministerial action plans, including funding, as the efforts involve several authorities and actors. Denmark has developed an effective institutional framework and implemented numerous initiatives to identify and assist victims.

National Coordination

173. The Danish-Centre-Against-Human-Trafficking (CMM) functions as the national coordinator and forms the core of the nationwide social work efforts for victims of human-trafficking. The CMM runs a national hotline, serves as the contact person for victims, runs an authority group, functions as a rapporteur-like mechanism and has developed national guidelines (NRMs). Assistance and support to victims of human-trafficking is provided through the CMM, the Danish-Immigration-Service (DIS), the Danish-Return-Agency, specialized NGO’s and other relevant actors. The Ministry of Employment and Gender Equality heads an interministerial working group. The Ministry of Employment and Gender Equality and the CMM participates in relevant international and regional forums and meetings on trafficking to strengthen cooperation and to exchange best practices, knowledge-share and discuss current trends and tendencies.

National Action Plan to Combat Trafficking in Human Beings 2026-2029

174. In January 2026 the Government presented its seventh National-Strategy-and-Action-Plan-to-Combat-Trafficking-in-Human-Beings 2026-2029. With the new action plan, the CMM is financially strengthened, funds to specialized NGO’s performing outreach activities in the field of prostitution and the specialized crisis center for women are

continued, and the police's efforts to combat trafficking is reinforced. Furthermore, there is a new initiative providing legal assistance to foreign vulnerable women including potential victims of THB in order to e.g. report violence and abuse to the police.

Prevention, outreach work and identification

175. Various authorities including police, work environment authorities, immigration authorities, tax authorities etc. play a central role in identifying potential victims of human-trafficking. CMM offers targeted training to authorities and other actors on signs of human-trafficking.
176. Efforts against the exploitation of vulnerable foreign workers have been strengthened through a number of measures in the labour-market aimed at preventing social dumping, illegal work and labour-crime which also contribute to prevent human-trafficking and to identify victims of human-trafficking.
177. Further, the action plan provides funds to outreach efforts by specialized NGO's especially in the field of prostitution. These efforts contribute to prevent human-trafficking in sexual exploitation and to establish contact with potential victims of human-trafficking with a view to ensure that they are officially identified as victims by the authorities and receive the right help.

Offers and services for victims of trafficking during the reflection period

178. In accordance with the National-Action-Plan, all victims of human-trafficking, as well as persons under investigation for this, are offered a reflection-period and assigned a contact person from CMM who coordinates their case and ensures that they receive the right social help.
179. For persons residing illegally in Denmark and for rejected asylum seekers, the reflection period gives an extended departure period of 30 days, which is granted by the DIS. The period can be extended up to a total of 120 days if the person cooperates in a prepared repatriation, or if special reasons justify it. CMM grants a similar reflection period of 30 days to persons with legal residence, which can be extended to a total of 120 days under the same conditions.
180. The offers during the reflection period include advice and legal assistance, access to relevant and safe accommodation, food and pocket money, the possibility of extended health care and psychosocial assistance. The assistance is tailored to the specific needs and situation of the victim.
181. All foreign nationals identified as victims of human-trafficking are offered assisted voluntary return and financial reintegration support by the Danish-Return-Agency. The financial support is designed to facilitate their safe and sustainable re-establishment in their country of origin or country of residence.
182. The reflection-period and the offers are not conditional on the victim contributing to the investigation and prosecution.

Residence and work permits

183. Victims of trafficking who apply for asylum may obtain a residence permit based on the Danish-Aliens-Act section 7, if they meet the criteria set out in the provision. The majority of trafficking-related offences occur outside the applicant's country of origin, therefore falling outside the scope of section-7-of-the-Danish-Aliens-Act. Victims of human trafficking can be given a temporary residence permit based on the Danish-Aliens-Act-section-9c-(4), if their presence is required for the police investigation in context of the legal proceedings against the perpetrators. The residence permit can be extended if the police deem it necessary for the investigation, but it may not be extended beyond the period of the investigation or prosecution.
184. If the Danish-Agency-for-International-Recruitment-and-Integration (SIRI) has any concerns of possible trafficking either during the application process or during the stay in Denmark, SIRI will seek to establish contact between the foreign national and CMM in order to help the foreign national avoid or escape a difficult situation. Based on the available information in the specific case SIRI will also report the employer/others to the police with a view to investigate and prosecute possible offences. Depending on the information SIRI will offer guidance on relevant residence permit schemes to relevant parties, e.g. in case of a new job offer.

Assistance to child victims of trafficking

185. Children exposed to human-trafficking need special protection. This applies in particular to unaccompanied minors who have come to Denmark without parents or other adults who have taken the place of their parents. To enhance cooperation in cases involving trafficked minors and children, there is a special focus in the current action plan on this area, including the development of national guidelines and operational procedures for handling suspected cases involving minors.
186. Children and unaccompanied minors receive a number of special offers besides the general offers under the action plan. Unaccompanied minors are appointed a personal representative who looks after the child's interest. Children who are lawfully residing in Denmark are eligible to receive assistance under the Danish-Child's-Act and thus the municipalities have an obligation to implement the necessary support for the children. In particular, the Act offers a number of social services that can prevent social exclusion and vulnerability, which otherwise could make children vulnerable to human-trafficking.

The-National-Action-Plan-for-Women-Peace-and-Security

187. The-National-Action-Plan-for-Women-Peace-and-Security (2025–2029) addresses trafficking-in-persons in Denmark and abroad, with a focus on protecting women and girls in conflict-affected areas from sexual violence, exploitation and trafficking. Internationally, Denmark's regional migration programmes aim to strengthen the protection of migrants along the migration routes towards Europe, including preventing and addressing human-trafficking. Besides, Denmark funds a program in Nigeria (MeCAHT 2023-2028) with the aim of increasing public awareness of human-trafficking and access to assistance for victims. Denmark contributes to the Global-Initiative-Against-Transnational-Organized-Crime (GI-TOC 2024-2029), which increases evidence and understanding of human smuggling and trafficking.

Strengthened law enforcement response to trafficking

188. Human-trafficking is often organized and it often includes a cross-border element. With the new action plan to combat human-trafficking and a new political agreement from December 2025 regarding the financing of the Police and Prosecution Service for 2026-2030, the police and prosecution efforts in the area are strengthened, especially in the area of prostitution, and strengthening efforts against forced labor. Due to the high complexity of human-trafficking cases, it is crucial that knowledge is shared in the area across police districts. Human-trafficking and human-exploitation are therefore a national focus area in the police, anchored in the South-Jutland-Police.
189. Furthermore, a provision on human-exploitation was inserted in the Criminal-Code-in-2022-(Section-262b). Exploitation of others to work under obviously unfair conditions or exploitation of a person for prostitution etc. can be punished under this provision, regardless of whether there is an element of coercion and regardless of whether the perpetrator has personally gained financial gain from the exploitation.
190. Criminal offences regarding trafficking-in-persons are regulated under Section-262a-of-the-Danish-Criminal-Code.
191. Human-trafficking is punishable under section-262a-of-the-Danish-Criminal-Code. For data regarding investigations, prosecutions and convictions of perpetrators, including the severity of the penalties imposed, see annex 1.3.

Treatment of aliens, including migrants, refugees and asylum seekers (arts. 6, 7, 9 and 13)

Reply to LoI Para. 15

Danish Aliens Act and Danish-Return-Act

192. Since 2020, the responsibility for return-related tasks has been transferred to the Danish-Return-Agency and the area is now regulated in the Danish-Return-Act. It shall be noted that paragraph 37(k) of the Danish-Aliens-Act has been repealed and the relevant provisions governing detention in the return procedure are now regulated in the Danish-Return-Act, which consolidates the legislative framework governing return procedures and sets out the conditions under which remand into custody may be ordered in the return procedure. In all cases, remand in custody is subject to judicial review and must comply with the principles of necessity and proportionality. The Danish courts review whether the conditions for detention are fulfilled and whether less intrusive measures would be sufficient. Under Danish law, detention may only be applied where necessary and proportionate to achieve the legitimate objective pursued and where less intrusive measures are insufficient.

Detention Centres

193. It shall be noted that Vridsløselille is no longer an institution under the Danish-Prison-Service and no longer in use as a detention centre.
194. Today, immigration related detention primarily takes place at Ellebæk-Centre-for-Foreigners. In general, Denmark has taken steps to ensure that remand in custody under the Danish-Return-Act is subject to strict judicial oversight and remains in compliance with Denmark's international human rights commitments and obligations according to the Covenant.
195. The detention facilities of Ellebæk-Centre-for-Foreigners have undergone significant efforts on modernisation with the purpose of reducing a prison-like environment. These improvements include recent installation of new flooring and windows, as well as enhancements to both the indoor and outdoor areas at the centre.
196. Furthermore, the Danish-Prison-Service has established a new and increased outdoor area, granting detained foreign nationals free access to an outdoor space in the period between 9AM-6PM.
197. The-Danish-Prison-Service has also established facilities for family accommodation within the facilities of Ellebæk, and is currently considering solutions to provide detainees at Ellebæk access to the internet, thereby enhancing their possibility of contact with the outside world.

Return Centres

198. See Reply-to-LoI-Para-1 for a detailed overview of "tolerated stay". Denmark notes that individuals who cannot be forcibly returned due to Denmark's international obligations are accommodated in designated return centres, e.g. Return-Centre-Kærshovedgård. The individuals accommodated at the centres are not deprived of their liberty and can come and go from the centres as they please, provided they uphold their duties (accommodation duty and daily duty to report). The-Danish-Return-Agency is permanently present at the return centres and proactively provides guidance to returnees regarding options related to voluntary return, including financial incentives.
199. Danish authorities continuously assess whether the accommodation duty and reporting duty remain necessary and proportionate, and individual circumstances are taken into account when determining the scope of accommodation and reporting duties for each individual.

Refugees and family reunification

200. Refugees with temporary subsidiary protection status are, as a rule, only eligible for family reunification after the expiry of a waiting period. In 2016, The Danish Parliament amended the Danish-Aliens-Act to the effect that, as a rule, beneficiaries of temporary subsidiary protection status in Denmark were required to wait three years for family reunification. However, due to the judgment of 9 July 2021 from the European-Court-of-Human-Rights in the case of M.A. v. Denmark,^{xxii} the Danish Parliament passed an amendment to this rule in 2022 adjusting the period to a two-year waiting period in order to comply with the judgment. In the period from the judgment to the amendment was passed the immigration authorities administered the waiting period as a two-year waiting period.
201. However, case by case, the immigration authorities must assess whether a refugee with temporary subsidiary protection status should be granted family reunification before the expiry of the waiting period, and family reunification is always granted when so required by Denmark's international obligations.

Reply to LoI Para. 16.

Asylum and Immigration Policy and Law

202. Denmark pursues a restrictive, responsible and realistic asylum and immigration policy that is in full accordance with Denmark's international obligations. Denmark has ratified the United-Nations-Refugees-Convention of 1951 and the European-Convention-on-Human Rights. Danish asylum law is thus in full accordance with Denmark's human rights obligations, including the principle of non-refoulement.
203. The right to seek asylum is fundamental and universal. In Denmark, the appeal system in asylum cases is two-tiered. The-Danish-Immigration-Service (DIS) is the first instance responsible for assessing a claim for asylum and the Refugee-Appeals-Board is the second and final instance.

204. Applications for asylum are decided by the DIS in two different procedures. Most cases are decided according to the so-called normal procedure. This entails that, if the asylum applicant is rejected, the case is automatically referred to the Refugee-Appeals-Board. A minority of cases are considered manifestly unfounded and decided in an accelerated procedure. This occurs when the DIS assesses that the applicant clearly cannot be granted asylum in Denmark. If the Danish-Refugee-Council agrees with the DIS, the application will be rejected without contest. The applicant cannot appeal this decision. However, if the Danish-Refugee-Council disagrees, the Danish-Immigration-Service will generally still reject the application, but will refer the matter to the Refugee-Appeals-Board for a final decision.
205. Regardless of the procedure, the asylum seeker has the right to remain in Denmark until the Refugee-Appeal's-Board has determined the outcome of the case (suspensive effect).
206. The so-called "jewelry law" is a tool for the immigration authorities to ensure that asylum seekers who are in possession of assets that could serve as a basis for covering the costs of their stay in Denmark actually use these assets for that purpose. As a general rule, asylum seekers and foreign nationals without legal residence in Denmark have their living expenses and necessary healthcare services covered by the DIS. The "jewelry law" concerns the rules on the seizure of assets exceeding a value of 10,000 DKK, so that these assets can be used to pay for DIS' expenses for the applicant's or their family's living expenses and necessary health services or accommodation at a shelter. Assets valued at up to 10,000 DKK and items that hold special personal significance to the individual in question will not be retained. Cf. Reply-to-LoI-Para-1.

Cooperation With Third Parties

207. Denmark has presently not entered into any agreements or arrangements with a third country on asylum processing. However, the Danish Government continues to explore the possibility of implementing innovative solutions in response to irregular migration, including through cooperation with third countries regarding procedures for processing of requests for international protection that is compatible with the Convention and other international obligations.

Residence Permits

208. DIS ensures that any withdrawal or non-extension of residence permits, including for Syrian refugees, respects human rights, particularly the right to private and family life. Before a decision is made, the permit holder is notified, given the opportunity to comment, and receives a written decision with reasons and appeal rights. Decisions are assessed for proportionality and compliance with international obligations, including the 1951-Refugee-Convention and the European-Convention-on-Human-Rights. All withdrawal or non-extension decisions are automatically appealed to the Refugee-Appeals-Board, and legal aid is provided to support the individual.

Access to justice, independence of the judiciary, and right to a fair trial (arts. 2 and 14)

Reply to LoI Para. 17

Access to Justice in Denmark

209. In Danish law, the presumption of innocence is reflected in fundamental principles of criminal procedure, including that the burden of proof rests with the prosecution and that guilt must be proven beyond reasonable doubt and the principle of in-dubio-pro-reo applies. It further follows from section-96(2)-of-the-Danish-Administration-of-Justice-Act that public prosecutors shall conduct each case as expeditiously as its nature permits, thereby ensuring not only that those who are guilty are brought to justice, but also that those who are innocent are not prosecuted.
210. Furthermore, Danish law operates on a two-instance principle, according to which district court cases can generally be appealed to the High-Court. Exceptions include cases where the conviction concerns a minor offence and the sentence imposed is a fine and/or confiscation below a certain amount. The High-Court's judgments in appeal can only be appealed to the Supreme-Court with the permission of the Appeals-Permission-Board.
211. Criminal convictions may be reopened pursuant to Chapter-86-of-the-Administration-of-Justice-Act, including at the request of the convicted person, or in practice by the prosecution service with the person's consent. Reopening

may take place where new evidence is likely to have led to acquittal or a more lenient outcome, in cases involving false testimony or errors in the assessment of evidence, or in order to follow a judgment from the ECHR.

212. It furthermore follows from section-907(3)-of-the-Administration-of-Justice-Act that the prosecution service can appeal in favour of the convicted person, even though the deadline for appeal has expired.
213. During the reporting period multiple revisions of the Administration-of-Justice-Act-for-Greenland has been implemented. All revisions of the Administration-of-Justice-Act-for-Greenland are written in both Danish and Greenlandic and available online.

Access to Justice in the Faroe Islands and Greenland

214. Equal access to justice and due process for the North-Atlantic-Courts-of-the-Faroe-Islands-and-Greenland is an explicit point of emphasis of the multi-year financial agreement for 2024-2027. Under the agreement a series of initiatives have been launched which aim to support a multi-year effort to address the North-Atlantic-Courts' challenges with case backlogs, long case-processing times and outdated IT-systems. Most legal documents and written evidence submitted in criminal cases by the prosecution are in Danish. Should an attorney, defendant or other legal actor not speak Danish, they can request that relevant documents be translated. All evidence to be relied on by the court is orally presented during the trial, and is translated in cases where the defendant does not speak Danish or if requested. The verdicts of the court are translated upon request.
215. Greenlandic-District-Court-Judges are fluent in both Greenlandic and Danish, and the vast majority of their cases are conducted in Greenlandic. As an extension of the efforts to strengthen the judiciary of Greenland, a formal legal degree for District-Court-Judges has been launched and pilot curriculum published at the end of 2025.

Right to privacy (art. 17)

Reply to LoI Para. 18

Legal framework on data collection

216. The collection, processing and retention of data regarding natural and legal persons by the Danish-Security-And-Intelligence-Service (DSIS) and the Danish-Defence-Intelligence-Service (DDIS) respectively are regulated primarily by the DSIS-Act^{xxiii} and the DDIS-Act^{xxiv} and executive orders pursuant to the acts. The legislation regulates the collection, obtainment, processing, erasure, disclosure and other forms of handling of information, including collection from open sources. The intelligence services may collect and obtain information which may be of significance to the performance of their respective intelligence-related activities.

Amendment of the DSIS-Act

217. The amendment of 11 June 2024 to the DSIS-Act, strengthens the control with the Danish-Security-And-Intelligence-Service (DSIS), introducing subsequent compliance control over the service's operational tasks to the mandate of the Danish-Intelligence-Oversight-Board as well as an expansion of access to information etc. The Board exercises its functions in complete independence.
218. Furthermore, there has been ongoing considerations in regard to a possible additional revision of the DSIS-Act, which will provide a legal framework for DSIS to collect and work with larger datasets. The legal framework intends to ensure, in light of the digitalized society, that the DSIS continuously has the tools necessary to prevent and counter espionage, sabotage and terrorism facing Denmark.
219. The legal framework will, in such case, be based upon the existing conditions for the collection and processing of information set out in the current DSIS-Act and will include legal safeguards which have the purpose of limiting any interference with the right to privacy as much as possible and ensuring that the interference does not go further than necessary to protect national security, public safety, and the prevention of disorder and crime.

Amendment of the Administration-of-Justice-Act

220. In 2024, the Administration-of-Justice-Act was amended,^{xxv} including in response to the CJEU's-judgement-of-5-April-2022-in-Case-C-140/20.^{xxvi} The amendment restricts police access to, and urgent preservation (hastesikring)

of, data retained solely for national security purposes to investigations concerning offences under Chapters 12-13 of the Danish-Criminal-Code (offences against the State). It further introduces mandatory subsequent judicial review of all police orders for disclosure to retained telecommunications data without prior court authorization, strengthening ex post oversight. The Act does not amend the obligation imposed on telecommunications providers to retain data, but concerns the conditions for access to such data.

Reply to LoI Para.19

Social Benefit System

221. The Danish social benefits system is tax-funded and is characterized by the fact that entitlement to the various social benefits is conditional upon meeting a number of criteria, which vary from one benefit to another. The administering authorities in Denmark, including the municipalities and Udbetaling-Danmark, are obliged to continuously monitor that the benefits are paid in accordance with the rules and that recipients are entitled to the benefits disbursed. If a benefit has been unduly received and in bad faith, the authorities are obliged to initiate recovery proceedings.
222. The administration of public benefits in Denmark takes place through extensive use and reuse of register data across the public sector. This practice is authorized by the legislation governing each individual benefit and ensures smooth, efficient, and transparent administration of benefits.
223. Administration, including ongoing data-based control, generally takes place within the framework of these rules and the data protection legislation, under the supervision of the Danish-Data-Protection-Agency. In addition, citizens have the right to appeal to independent appeals bodies that are empowered, among other things, to review whether specific decisions under the benefits legislation are correct.
224. As Udbetaling-Danmark is responsible for administering a wide range of welfare benefits in Denmark and annually disburses benefits amounting to DKK 274 billion, specific rules have been established to support the correct payment of benefits.

Data-driven Fraud Detection

225. In 2015, a joint data unit called Data-driven-Fraud-Detection^{xxvii} was established within Udbetaling-Danmark with the purpose of strengthening register-based controls in Udbetaling-Danmark, the municipalities, the Danish-Agency-for-Higher-Education-and-Science^{xxviii}.
226. The framework for register-based control within the Data-driven-Fraud-Detection is regulated by the Act-on-Udbetaling-Danmark (Sections-12-and-12a–12i) and is subject to the Danish-Public-Administration-Act, national data protection rules, and the EU-General-Data-Protection-Regulation (GDPR). There is no legal basis for using sensitive personal data in register-based controls.
227. Under the rules, Udbetaling-Danmark may cross-check information concerning benefit recipients within its own areas of responsibility, as well as within municipal and certain other selected authorities' areas, against information from other public registers for the purpose of verifying the lawful payment of benefits.

Data Matching and Protection

228. The provisions of the Act-on-Udbetaling-Danmark constitute an overall framework for data matching and therefore do not specify in detail which data Udbetaling-Danmark may cross-check. This depends on the specific benefit in question. For some benefits, it may be relevant to cross-check information relating to persons other than the benefit recipient, such as a cohabiting partner or spouse. However, data matching must always comply with data protection rules, and Udbetaling-Danmark may only carry out data matching that is "necessary and relevant" in accordance with the requirements of the GDPR.
229. Udbetaling-Danmark may not conduct data-matching involving sensitive personal data, such as information about health, trade union membership, or race, nor may it use data from private actors, social media, or geolocation data from, e.g. Google or telecommunications companies.

230. Data-matching is carried out by algorithms that compile and compare available data sources in order to identify data points that deviate significantly from the rest of the dataset. This may include information that differs substantially from patterns or levels otherwise observed in the data and may therefore indicate errors, special circumstances, or a need for further investigation.
231. Only standard algorithms are used, some of which may be described as machine learning and which in certain contexts are classified as (simple) artificial-intelligence. Generative-AI (language models) is not used in data matching to predict citizens' behavior. For the sake of transparency, there is full insight into and full control over the data processing that takes place, and all results can be explained.
232. There is a clear focus on ensuring equal treatment in the development of data-driven controls. This means that information such as gender, age, place of residence, and socio-economic factors are not included as weighted criteria in searches. These types of information are therefore not used to influence who is selected for control. Selections are based on the specific and objective conditions that apply to receiving the benefit in question. This reduces the risk that results are affected by unintended distortions or new forms of bias.
233. Citizens are informed that data-matching may be carried out for control purposes when applying for benefits administered by Udbetaling-Danmark and the municipalities.
234. All cases selected through data-driven control are processed manually by staff members who ensure compliance with the legislation, including informing the citizen of the background for the control case and ensuring that the citizen is heard and provided with guidance on how to appeal before a decision is made.
235. Citizens also have the opportunity to appeal to independent appeal bodies against authorities' decisions concerning any changes to benefits and recovery claims resulting from a control case.

Supervision of Udbetaling-Danmark

236. The Minister for Employment exercises overall supervision to ensure that the Board of Directors of Udbetaling-Danmark ensures that Udbetaling-Danmark operates in accordance with the legislation. This supervision of the Board does not constitute operational supervision and does not include control or monitoring of day-to-day operations or individual cases in Udbetaling-Danmark. This responsibility lies with the administration of Udbetaling-Danmark within the framework laid down by the Board. In addition, each line ministry exercises general sectoral supervision of its own schemes and may, as part of this, review individual cases to ensure compliance with the legislation. The sectoral supervision likewise does not constitute operational supervision.
237. Under the legislation, Udbetaling-Danmark is subject to both internal and external audit, and the Board has also adopted a data ethics policy. A yearly report is prepared to the Board and certified by audit, describing compliance with the applicable data protection rules. The report forms part of internal audit's overall assessment of whether risks in the GDPR area are being managed adequately.
238. The Danish-Data-Protection-Agency has the authority to supervise whether Udbetaling-Danmark complies with data protection rules, including in specific complaint cases from citizens or through inspections.

National strategies on digital inclusion and accessibility

239. Among the citizen-oriented measures, The-Agency-for-Digital-Government has implemented the European Directive on the accessibility of websites and mobile applications provided by public sector bodies and monitor and report on compliance with the law as stated in the Web-Accessibility-Directive.
240. Since 2015, the Agency-for-Digital-Government has facilitated the Network-for-Digital-Inclusion with civil society organizations representing people with disabilities, older persons, migrants and people facing social exclusion to support and enhance the possibilities of people challenged by digitalization to participate in the digital society.
241. The Danish e-ID is available in Danish, English and Greenlandic (Kalaallisut).
242. In addition, guides, animated films and courses are being developed specifically for citizens who are challenged by digitalization. These guides are also interpreted into sign language.

243. To support citizens who are unable to use digital services, Denmark has passed a law to simplify the rules for exemption from Digital-Post and to make it easier to be offered an alternative to digital self-service.
244. To support the conditions for individuals who require third-party assistance, the Agency-for-Digital-Government is responsible for Digital-Delegation (Digital-Fuldmagt); a public IT-service that enables a citizen to mandate digital power of attorney for public self-service systems. It enables the representative of the citizen to act in public digital self-service systems on behalf of the citizen.
245. In addition, the government has agreed upon several initiatives for digital inclusion which aim to increase awareness among citizens who assist others about support possibilities as well as to improve conditions for volunteers and civil society organizations engaged in IT-support.
246. To support authorities to create more including digital services, The-Agency-for-Digital-Government, Local-Government-Denmark and Danish-Regions collectively developed a set of Principles-for-Digital-Inclusion. Furthermore, a network has been established to strengthen the sharing of knowledge and experiences concerning digital inclusion across authorities in municipalities, regional governments and central government departments.

Freedom of conscience and religious belief (arts. 2, 18 and 26)

Reply to LoI Para. 20

247. In Denmark, religious communities do not need any registration or official permission to exercise their religious affairs. However, religious communities do have the possibility to register as a recognised religious community through the Act-on-Religious-Communities outside the Established-Church-of-Denmark. Such recognition is voluntary and provides certain legal benefits. The Act promotes tolerance towards and respect for religious diversity in the Danish society by clarifying the rights and obligations for recognised religious communities.

Danish Action Plan against antisemitism

248. The Danish government and a broad coalition of parties have presented a Danish-Action-Plan-Against-Antisemitism-for-2026-2029. Hereby, the targeted initiatives launched in 2022 and 2024 are continued and strengthened.
249. Focus in the new action plan is on stronger criminal justice efforts, online antisemitism, schools and the education system, research and public knowledge. It contains initiatives and information on safety and security, prevention and combating of antisemitism and hate crime, including online antisemitism and both internationally and domestically. This includes countering antisemitism on tech giants' platforms, mapping antisemitism on social media and reporting antisemitic hate crimes. Funds are allocated to a new association against antisemitic hate crimes with the aim to ensure systematic monitoring, documentation and reporting of criminal antisemitic statements and actions.

Freedom of expression (arts. 19 and 20)

Reply to LoI Para. 21

250. All public authorities must act in compliance with the Covenant, and legislation must be drawn up and given effect in accordance with the ICCPR. Thus, national law regulating journalistic freedom of expression is compatible with articles-19(3)-and-20-of-the-Covenant.
251. According to section-77 of the Constitution any person shall be entitled to publish their thoughts in printing, in writing and in speech, provided that they may be held accountable in a court of justice. Censorship and other preventive measures shall never again be introduced.

Freedom of Expression of Civil Servants

252. A law from 2025 protects the freedom of expression of civil servants aiming to clarify that civil servants have the right to speak out freely without any repercussions from their workplace, as long as the statements are not on behalf

of the workplace, regarding classified information, nor particularly unreasonable, misleading or false. However, classified information can be of such relevance for the public that a civil servant can break their duty of confidentiality without criminal repercussions, cf. section-152e(2)-of-the-Danish-Criminal-Code.

253. Private sector employees who perform public functions enjoy protection of their freedom of speech according to the Constitution and the ECHR, but are not protected in the same way.
254. A law from 2021, protects whistle-blowers giving civil servants and workers in the private sectors protection when reporting offences at their workplace. Besides partly originating from an EU-directive, the law also ensures a mechanism for employees to anonymously report unlawful acts.

Undue Treatment of Objects of Significant Religious Importance

255. Regarding the mentioned amendment to section-110(e)-of-the-Criminal-Code, it follows from section-110(e)(2), that a fine or imprisonment for a term not exceeding two years is imposed on any person who is guilty of improper treatment in public, or with intent to disseminate such treatment to a wide group of people, of a scripture of major significance to a recognised religious community, or of an item resembling such scripture. Thus, the provision is limited to scripture of major significance to a recognised religious community or an item resembling such scripture, and not “objects of significant religious importance” in general. Section-110(e)(2) was introduced in response to systematic insulting and denigrating actions in the summer of 2023, which, among other things, have increased the terrorist threat against Denmark.
256. “Undue treatment” refers to physical actions whereby the scripture is destroyed, damaged in a derogatory or contemptuous manner or otherwise physically treated in a contemptuous or derogatory manner. This includes e.g. burning, soiling, trampling on or kicking the scripture, pouring liquid over it or smearing it with food, or destroying it by tearing or cutting it into pieces or similar. The provision does not cover verbal or written expressions, including drawings, about religious writings and subjects.
257. The protection of freedom of expression under article-19 is not absolute. Restrictions may be imposed if they are prescribed by law and are necessary for respect of the rights or reputations of others or for the protection of national security or of public order, or of public health or morals, cf. article-19(3). It is the assessment, that section-110(e)(2) meets the requirements in article-19(3), including the requirements of legality, necessity, and proportionality, as the criminalization is limited to actions, which are unnecessarily offensive or hurtful, and does not include e.g. written or oral statements.

Peaceful assembly (art. 21)

Reply to LoI Para. 22

258. The rights to unarmed, peaceful assembly without previous permission and the freedom of speech are guaranteed by section-79 of the Constitution.
259. Open-air meetings may be prohibited when it is feared that they may constitute a danger to the public peace, and they must for safety reasons be reported to the police. However, failing to report does not make the assembly illegal. The protection applies equally to minority groups, opposition parties etc.
260. If the assembly in general or a single participant pose a significant disturbance of public order or danger to the safety of individuals or the public safety, the police can issue injunctions related to the assembly or participants, e.g., moving the assembly to a suitable place, where the assembly can be heard and seen, inspection of a person’s body or seize a person’s objects.
261. If these means are not sufficient to prevent the significant disturbance of the public order, the police may, if necessary, deprive the person of one’s liberty, or, in exceptional cases and based on a specific risk assessment, the police are entitled to restrict or even prohibit the assembly.
262. The police may only use means of force, which are deemed necessary and just and only to an extent, which is proportionate to the identified danger.

263. The police are obliged to act within the legal framework and may not subject participants in a peaceful assembly to arbitrary arrest or fines. Complaints can be appealed to the courts and any alleged misconduct of the police can be reported to the Danish-Police-Complaints-Authority.

Freedom of association (art. 22)

Reply to LoI Para. 23

264. Freedom of association in Denmark is ensured within a constitutional and legal framework that safeguards the activities of civil society, including human rights defenders and NGO's.

265. Pursuant to section-78(1) of the Danish-Constitution, citizens have the right to form associations without prior permission for any lawful purpose and without judicial review. Associations are free to determine their objectives, activities and internal organisation, but may be prohibited and subsequently dissolved by judgment if they operate or seek to achieve their aims by violence, incitement to violence or similar punishable means.

266. Denmark maintains its full support for LGBT+ rights and opportunities and the work by NGO's in the field. Denmark financially supports LGBT+ NGO's in Denmark and Greenland. Besides, Denmark hosted the 13th European-IDA-HOT+-Forum in Copenhagen in May 2026, which serves as a unique platform for policy-makers, civil society and international organisations to exchange, coordinate and reinforce efforts to advance equal rights and opportunities for LGBTI-persons across Europe.

Rights of Indigenous Peoples (arts. 1 and 27)

Reply to LoI Para. 24

267. In the preamble to the Act-on-Greenland-Self-Government,^{xxix} it is recognized that the people of Greenland is a people pursuant to international law with the right of self-determination, and the Act is based on a wish to foster equality and mutual respect in the partnership between Denmark and Greenland. Accordingly, the Act is based on an agreement between Naalakkersuisut (the Government of Greenland) and the Danish Government as equal partners. As stated in the preparatory remarks, one of the purposes of the Act is to create the legal basis for Greenland to assume additional competence, where this is constitutionally possible. Pursuant to the previous Greenland-Home-Rule-Act (1979), Greenland has already assumed legislative and administrative responsibility in a substantial number of fields that affect the daily lives of Greenlandic citizens. In 2009, the Self-Government-Act replaced the Home-Rule-Act and provides the Greenlandic Self-Government authorities to assume a number of new fields of responsibility, cf. List I and II in the Schedule to the Self-Government Act. Reference is made to a list^{xxx} updated by the Prime Minister's Office with an overview of the fields where Greenland has assumed responsibility. The Greenlandic Self-Government authorities decide when fields of responsibility are assumed. With the assumption of a field of responsibility, the Greenlandic Self-Government authorities assume legislative and executive power in the field as well the responsibility for the financing of the related expenditures.

268. According to the Act-on-Greenland-Self-Government, the Danish Government's draft bills which comprise or may be brought into force for Greenland must, before being presented to the Danish Parliament, be submitted to the Greenlandic Self-Government authorities for comments. The Danish Government must await the Greenlandic Self-Government authorities' comments before presenting draft bills to Danish Parliament, which contain provisions that exclusively apply to Greenland or are of particular importance to Greenland. Corresponding consultation procedures apply to administrative orders. The Prime Minister's Office has issued guidelines^{xxxi} on Danish ministries' handling of cases concerning Greenland, which, among other things, contain guidance on the process for introducing legislation for Greenland in areas of responsibility that have not been assumed by the Greenlandic Self-Government authorities. For further see Section-C on areas devoted to Greenland.

Reply to LoI Para. 25.

Placement of children from Greenlandic families in Denmark

269. Danish Municipalities are no longer allowed to use standardized psychological tests in cases concerning placement of children from Greenlandic families as of May, 2025. Instead, municipalities must use a special unit having expertise in Greenlandic language and cultural affairs under the Danish-Authority-of-Social-Services-and-Housing.
270. The municipalities are also obligated to request that this unit review all ongoing placements where standardized psychological test have been used or must be assumed to have been used in connection with decisions about placing a child from a Greenlandic family in out-of-home care in Denmark.
271. The decision to place a child in care is made by the municipal council. This decision may be made only after the completion of a child protection examination under the Danish-Child's-Act.
272. Furthermore, the municipalities are in general obligated to consider the family's cultural and linguistic background in cases on placement of a child. The municipalities are also obligated to provide a translator.

Prevention of sexual abuse in Greenland

273. An important initiative in regards to prevention and response to sexual abuse against children in Greenland, is the Child's-Travelling-Unit, originally established as part of a cross-disciplinary collaboration to strengthen efforts for vulnerable children in Greenland. The unit provides treatment to children who have been victims of abuse and children who exhibit sexually disturbing behavior, among others.

Measures adopted to prevent and respond to gender-based violence and sexual abuse against Indigenous women in Denmark

274. Denmark does not have separate legislation concerning Indigenous women, particularly Greenlandic women, in relation to gender-based violence and sexual abuse. However, anyone with legal residence in Denmark, including Greenlandic women, have the right to help and support under the Act-on-Social Service. This also includes staying in a crisis shelter.
275. Furthermore, the Government continuously allocate funding to a broad range of initiatives aimed at improving conditions for socially disadvantaged groups, which also includes initiatives for women with a Greenlandic background. For example, under the social, health and employment reserve for 2025–2028, DKK 1.4 million annually for the period 2025–2027^{xxxii} was allocated to strengthen the efforts of the four 'Reden' (The Nests) to support vulnerable Greenlandic women.

Statistical data on the prevalence of violence against Indigenous women and children

276. Denmark does not collect register-based data specifically monitoring gender-based violence and sexual abuse against Indigenous women and children in Greenland. It should be noted that the Ministry of Social Affairs only collects information on individuals in Denmark, as the Social-Services-Act does not apply to Greenland.
277. Since 2017 Denmark has collected individual-level data on women and children's stay at or contact with women's crisis shelters in Denmark. The statistics are based on personal identification numbers, which allow identification of individuals born in Greenland or with parents born there. However, Inuit background cannot be identified, and anonymous shelter users cannot be identified by country of origin.
278. Since 2005, the Danish Ministry of Justice has conducted a national victim survey of the population's exposure to violence and other forms of crime. Since then, questions on exposure to rape and other sexual offences have been included in the survey. In the future, the survey will be conducted in Denmark, Greenland and the Faroe Islands. Respondents in the Greenlandic survey are expected to be individuals aged 15 or older who are residents in Greenland. The survey does not contain information on whether respondents are indigenous to Greenland or of Danish or other origin residing in Greenland.

Greenland's accession to the Istanbul Convention

279. During the reference period the Danish Ministry of Justice and the Greenland Government (Naalakkersuisut) has started a process which will lead to Greenland being covered by the Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul Convention).

C. Reporting on areas Devolved to Greenland

280. This section compiles Greenland's contributions to Denmark's Seventh ICCPR-report organized by devolved area.

Health Services

Reply to LoI para. 8 (Voluntary termination of pregnancy, and sexual and reproductive rights (arts. 6-8))

281. **a)** Access to termination of pregnancy in Greenland is regulated by Act-No.-232-of-12-June-1975-on-Termination-of-Pregnancy-for-Greenland. The Act provides for abortion on request up to the end of the 12th week of gestation. After this time limit, termination of pregnancy requires prior authorization from a regional abortion council.
282. Decisions adopted by the regional abortion councils may be appealed to the Abortion-Appeals-Board (*Abortanken-ævnet*), which functions as an independent administrative appeals body and conducts a full review of both the legal and medical assessment of the case. The Board issues final administrative decisions in appeal cases.
283. During the period 2016–2026, the Abortion-Appeals-Board issued final administrative decisions in 16 appeal cases concerning requests for termination of pregnancy after the 12th week of gestation. Of these, 3 appeals resulted in authorization being granted. In the remaining 13 cases, the decisions of the regional abortion councils were upheld.
284. In the cases where authorization was not granted, the Board found that the legal requirements for termination of pregnancy after the 12th week, as set out in the applicable legislation, were not fulfilled.
285. None of the appeals decided during the period 2016–2026 concerned pregnancies resulting from rape.
286. **b)** Greenland continues to be challenged by very high rates of sexually transmitted diseases, unwanted pregnancies and other related issues. Schools in Greenland offer sex education, but it does not work optimally. The prevention unit Paarisa^{xxxiii} has various activities, including podcasts and social media activity.
287. Health care professionals in Greenland have access to updated information on contraception in a common quality assurance system. There is considerable focus on the area, partly because the staff constantly must deal with the above-mentioned challenges of sexually transmitted diseases and unwanted pregnancies. Contraception is made available to the population free of charge.

Follow-up on the IUD-campaign before 1992:

288. Since the health service was taken over as of 1 January 1992, everything concerning the IUD-campaign before this date is under Denmark's jurisdiction.
289. We therefore refer to a press release^{xxxiv} issued by the Ministry of the Interior and Health in Denmark^{xxxv}.
290. In 2024 the Government of Greenland launched their own expert inquiry of the human rights aspects of the Contraception Case, since the 1960's.
291. The inquiry was to cover, whether or not there had been violations of the universal human rights and of the Indigenous Peoples rights. In addition, there was to be an assessment on whether or not the alleged violations live up to the definition of genocide.
292. In December 2025 and in January 2026, two members announced that they had decided to step out of the Expert Group. The reason being professional disagreements between the members, and partly a concern for the geopolitical situation. The two members who stepped out of the Expert Group offered to deliver their own separate contribution, which was accepted. In order to avoid the professional standard of the reports being called into question, the Government of Greenland has decided to let both reports undergo a peer-review process, where method and professional standards are to be assessed by other independent researchers. The reports were published 28 August 2026.
293. The Government of Greenland opened in October 2025 the possibility for applying for financial compensation to women, who after repatriation of the health service 1 January 1992, who involuntary and unknowingly had

contraception. The application deadline was 31 December 2025. Because of the receipt of a larger number of applications than first expected, the processing time has been extended. Each woman may be granted a maximum of 300.000 DKK.

Year	Decision of the Abortion Appeals Board	Grounds
2016	Refusal	Legal requirements for termination of pregnancy after the 12th week not fulfilled
2017	Authorization granted	Conditions under §3 (6) assessed to be fulfilled
2017	Refusal	Legal requirements for termination of pregnancy after the 12th week not fulfilled
2018	Refusal	Legal requirements for termination of pregnancy after the 12th week not fulfilled
2018	Refusal	Legal requirements for termination of pregnancy after the 12th week not fulfilled
2019	Refusal	Legal requirements for termination of pregnancy after the 12th week not fulfilled
2020	Refusal	Legal requirements for termination of pregnancy after the 12th week not fulfilled
2021	Refusal	Legal requirements for termination of pregnancy after the 12th week not fulfilled
2021	Authorization granted	Conditions under §3 (6) assessed to be fulfilled
2022	Refusal	Legal requirements for termination of pregnancy after the 12th week not fulfilled
2022	Refusal	Legal requirements for termination of pregnancy after the 12th week not fulfilled
2022	Refusal	Legal requirements for termination of pregnancy after the 12th week not fulfilled
2022	Refusal	Legal requirements for termination of pregnancy after the 12th week not fulfilled
2025	Authorization granted	Conditions under §3 (6) assessed to be fulfilled
2025	Refusal	Legal requirements for termination of pregnancy after the 12th week not fulfilled
2025	Refusal	Legal requirements for termination of pregnancy after the 12th week not fulfilled

Social Sector – Child Placements and Assessment Tools

Reply to LoI para. 25 Rights of Indigenous Peoples (arts. 1 and 27)

294. National therapy and counselling centre Inulervik does not conduct psychometric tests that can be used in decisions regarding out of home placements.
295. Inulervik's work is grounded in a trauma informed and holistic approach to the assessment and treatment of children and young people.
296. Inulervik has collaborated with the former Children's-Task-Force and the University-of-Southern-Denmark (SDU) to develop assessment tools with a strong cultural foundation. These tools are designed for use across professional groups working with children and adolescents.
297. Inulervik also provides training in how to apply the assessment tools. The tools have been digitalised, ensuring access regardless of geographical location.

Equality and Anti-Discrimination

Reply to LoI para. 4 Non-discrimination (arts. 2 and 26)

298. On 1 June 2024 Inatsisartut-Act-No.-36-on-Equality-and-Anti-discrimination entered into force. The aim of the legislation is to promote equal treatment and prevent both direct and indirect discrimination in society on grounds of — gender, pregnancy, adoption, maternity leave, sexual orientation, gender identity, gender expression, gender characteristics, race, skin color, national, social or ethnic origins, disability, age, political views, religion or faith. Furthermore, the act established both the Board-of-Equal-Treatment and the Gender-Equality-Council.
299. In accordance with the Equality-and-Anti-Discrimination-Act-Section-21, the Board-of-Equal-Treatment is politically independent and considers complaints of discrimination based on the grounds listed in Section-4. In accordance

with the Equality-and-Anti-Discrimination-Act-Section-38, the Gender-Equality-Council is tasked with promoting gender equality and the rights and interests related to gender equality, as well as raising awareness and providing information about equality in society.

300. In 2020 the Spokesperson-Institution-for-Persons-with-Disabilities-in-Greenland (Tilioq) and the University-of-Greenland (Ilisimatusarfik) examined the general population's knowledge about and perception of persons with disabilities. 39 pct. of the population believe that others hold prejudices against persons with disabilities; incl. respondents who answered 'I think so', the figure is 61 pct. Two-thirds of the population are positive about working with a person with a physical disability, whereas 43 pct. can see themselves working with a person with a mental disability.

Reply to LoI para. 6 Gender equality (arts. 2, 3, 25 and 26)

301. To promote equal gender representation in public committees, councils and commissions established by Naalakkersuisut, the composition must ensure that there is at most one more member of one gender than of the other. The purpose of this provision is to ensure gender balance and promote equality considerations in decision-making processes. The provision is gender-neutral, as it does not favour one gender over the other, but ensures that both genders are represented. This provides both transparency and fairness in the composition of public bodies and strengthens the overall gender equality effort.
302. Naalakkersuisut is prioritizing the systematic collection of gender-disaggregated-data across several key areas as part of the aim of creating more equal representation of gender og as part of equal pay for equal work. Under Act.-No.-36-on-Equality-and-Anti-discrimination-section-37, Greenland-Statistics must provide pay statistics every other year. Furthermore, in accordance with the Equality-and-Anti-discrimination-Act-under-Section-34 to promote equal representation of gender, public committees, councils, commissions and similar bodies established by Naalakkersuisut must be composed so that there are at most one more member of one gender than of the other.

Tourism and Mineral Resources

Reply to LoI para. 24 Rights of Indigenous Peoples (arts. 1 and 27)

303. No formal distinction is made between Indigenous Peoples and people of other origins in this context.
304. On 1 January, 2025, a new Act-on-Tourism-Activities was passed, making it a requirement that a tourism license has been issued for tourism activities. The requirements include that the licensees must be mainly resident and fully liable to tax in Greenland, have a safety plan for possible accidents related to tourism activity and have insurance coverage.
305. A new Act-on-Concessions-for-Tourism-Services came into force on 1 January, 2025. When rules have been drawn up on a concession requirement in a defined area, a public tender round will be launched for at least 45 calendar days. Concessions will only be granted to people who have had a national registry address in Greenland for 5 years. The concession period can be granted for up to 10 years. The total period for a concession for tourist services will therefore not exceed 30 years.
306. All citizens in Greenland have the right to be heard in connection with specific mineral projects. Before an exploration licence is granted, public consultation must be conducted for at least 21 calendar days, and before an exploitation licence is granted, the consultation period must be at least 35 calendar days. Consultation responses form part of the decision-making basis and may result in licence conditions. They also ensure that the licensee is made aware of any public opposition. If a project is expected to have significant environmental or social impacts, both a preconsultation^{xxxvi} and a formal 8-week consultation with public meetings must be conducted. Responses from the pre-consultation inform the impact assessments. Following the consultation, the licensee must prepare a White-Paper addressing all comments and questions. The project may only proceed once the White-Paper has been approved by Naalakkersuisut. On 25 June 2026, the Government of Greenland, Naalakkersuisut, made a decision to reject an application from Greenland-Minerals-A/S, the company behind the Kuannersuit-project, for renewal of their exploration licence.

D. Reporting on the Faroe Islands

307. This section compiles the Faroe Island's contributions to Denmark's Seventh ICCPR-report organized by devolved area.

308. The Faroese Ministry of Foreign Affairs and Fisheries coordinated the preparation of this report in cooperation with Faroese ministries.

Reply to LoI Para. 3 - Constitutional and legal framework within which the Covenant is implemented (art. 2)

309. Recognizing the important role played by national human rights institutions the Government continues to consider possible models for establishing a Faroese NHRI, independent of the Danish-Institute-for-Human-Rights, and in line with the Paris-Principles. These considerations take into account the capacity and small size of the Faroese public administration, as well as the efficient use of public resources. The Government generally seeks to rely on existing institutions where they can effectively perform the required relevant functions.

310. In this regard, the Government considers that the Faroe Islands already possess a number of well-functioning publicly funded and oversight bodies that contribute to the promotion, protection, and monitoring of Covenant rights and human rights more generally. These include, inter alia, the Parliamentary-Ombudsman, the Faroese-Board-of-Appeal, the Gender-Equality-Commission, the Children's-Ombudsman and, since 2025, the Disability-Ombud^{xxxvii}.

Reply to LoI Para. 4 - Non-discrimination (arts. 2 and 26)

311. Faroese legislation guarantees equal rights for all. Pursuant to section-5-of-the-Home-Rule-Act, legislative and executive authorities are bound by international treaties and conventions applicable to the Faroe Islands^{xxxviii}. Draft legislation is reviewed by the Department of Legislative Affairs to ensure compliance with the Danish-Constitution, the Home-Rule-Act, and relevant legal principles, including human rights obligations where appropriate. All draft legislation submitted to Parliament is subject to public consultation, ensuring transparency. Public authorities are also bound by the principles of equality, legality, and objectivity, which prohibit arbitrary or discriminatory decision-making^{xxxix}.

312. Protection against discrimination is primarily ensured through the Gender-Equality-Act, which prohibits discrimination on the basis of sex and guarantees rights relating to, inter alia, employment, equal pay, and participation in public bodies^{xl}. Efforts are underway to strengthen the Act, including the complaints mechanism and the institutional capacity of the Gender-Equality-Commission. Complaints concerning discrimination are handled by the Gender-Equality-Commission, administrative authorities, and the courts.

313. Civil same-sex marriage has been permitted since 2017, and since 2021 parents in same-sex female relationships have been granted equal parental rights^{xli}.

Reply to LoI Para. 6 - Gender Equality (arts. 3, 25 and 26)

314. Gender equality remains a policy priority. The-Equality-Office, established in 2020, provides guidance and can consider complaints relating to gender discrimination. While its mandate does not extend to sexual orientation and gender identity, it plays an important role in promoting equality and awareness. Efforts are ongoing to strengthen gender mainstreaming, institutional capacity, and data collection to support evidence-based policymaking.

315. The Gender-Equality-Act requires employers to provide equal pay and equal working conditions for women and men performing the same work or work of equal value. According to Faroese Statistics, women accounted for 37–39 per cent of total wage income during the past decade, while men accounted for 61–63 pct.^{xlii}. This disparity reflects structural factors, including a gender-segregated labour market, differences in working hours, and the unequal distribution of care responsibilities.

316. Amendments to the tax system, together with targeted wage increases for certain female-dominated occupational groups, are expected to contribute to greater equality. In addition, the Government has strengthened the evidence base for policymaking through a comprehensive gender equality survey and investments in gender-disaggregated statistics.

317. The independent committee Demokratia works to encourage women's participation in politics through awareness-raising activities, public debate, and cooperation with political stakeholders. These efforts aim to contribute to increased representation of women in Parliament and public decision-making processes more broadly. In the Faroe Islands, women hold 28.6 pct. of positions in Government, 30 pct. of seats in Parliament, and 33 of seats in municipal councils. Strengthening implementation and accountability therefore remains an ongoing priority.

Reply to LoI Para. 7 - Violence against women, including domestic violence (arts. 3, 7 and 26)

318. In 2023, the Government introduced a new action plan on violence in intimate and close relationships, building on earlier plans from 2011 and 2016.^{xliii} The plan strengthens professional efforts, information, and education on violence, with particular focus on children, young people, women, men and newcomers. Psychological support for victims and their families has been expanded, group-based counselling programmes have been strengthened, and follow-up support and aftercare have been introduced. In addition, the Faroese-Criminal-Code has been amended to increase penalties for sexual offenses, criminalise psychological violence as well as stalking and sex without consent is regarded as rape^{xliv}.

319. In 2024, a Knowledge-Department was established with a staff member responsible for collecting systematizing and analysing statistical and qualitative data, as well as for teaching, informing, and producing materials related to violence. As part of these efforts, a new statistical monitoring system was launched. Efforts are ongoing to integrate knowledge on violence into education and professional training for relevant sectors, including health, education, and social services. A national hotline for victims, relatives, professionals, and perpetrators is expected to become operational in 2026, with a dedicated coordinator appointed.

320. According to the records of the Women's-House, the number of inquiries received were 426 in 2022, 679 inquiries in 2023 and 850 in 2024. The most frequently reported reasons for seeking assistance are psychological, physical and material violence, and threats of violence^{xlv}. Preparations to strengthen the Women's-House with the establishment of an outpatient counselling service for women, men, and relatives affected by violence became operational in 2023.

Reply to LoI Para. 8 - Voluntary termination of pregnancy, and sexual and reproductive rights (arts. 6–8)

321. A new Faroese-Abortion-Act was adopted in December 2025 and entered into force 1 July 2026^{xlvi}. Under the Act, women residing in the Faroe Islands may obtain an abortion before the end of the 12th week of pregnancy, provided that counselling has been offered. This includes independent counselling and support before and after the procedure, as well as information on available assistance to continue the pregnancy and for support after childbirth. After the 12th week, abortion may only be permitted if the circumstances forming the basis of the application are proportionate to the health risks associated with the procedure. This involves a specific medical assessment regulated by law.

322. The number of abortions in the Faroe Islands in recent years is shown in the table below. Refusals have been based on medical assessments concluding that the legal requirements were not met.

Year/Age	<15	15-19	20-24	25-29	30-34	35-39	40-44	45-49	Total
2014	-	4	6	4	8	4	4	-	30
2015	-	3	6	3	5	2	2	-	21
2016	-	3	6	7	3	6	-	1	26
2017	-	2	4	7	2	2	2	-	19
2018	-	3	8	4	4	3	3	-	25
2019	-	2	2	11	4	2	-	-	21
2020	-	3	12	4	3	4	3	-	29
2021	-	6	6	6	7	3	4	2	34
2022	-	2	8	6	4	5	2	-	27
2023	-	5	6	10	13	7	1	-	42
2024	1	3	10	7	10	5	7	-	43
2025	-	3	5	3	12	5	4	1	33

Preventive Health Services and Education on sexuality

323. Children and young people are entitled to a structured preventive health service that supports their health and well-being^{xlvii}. This includes:

- Regular preventive health examinations from birth until the end of compulsory schooling
- Counselling and guidance on health, well-being and development
- Monitoring of physical, mental and social health conditions
- Access to special support and guidance

324. Gigni is the public institution in the Faroe Islands responsible for preventive health services for children and young people^{xlvi}. After birth, a health nurse conducts regular home visits during the child's first year. In school, the school nurse advises, guides, and educates children and young people on health, development and well-being, and conducts regular conversations with each pupil. Counselling and guidance are also provided to parents of schoolchildren, as well as to teachers and school management.

325. Education on health and sexuality constitute a compulsory area of instruction in public schools^{xlix}. Parts of the teaching are organized in cooperation with the school nurse who provided guidance on contraception and information about sexually transmitted infections. The-Faroese-National-Agency-For-Education regularly offers teachers inspirational courses and teaching materials on health and sexuality^l.

Reply to LoI Para. 9 - Right to Life (art. 6)

326. The Faroe Islands are covered by the 1992 United-Nations-Framework-Convention-on-Climate-Change and the 2015-Paris-Agreement.

327. Although the Faroe Islands do not have a specific climate-act, the Faroese Parliament has adopted emission reduction targets through parliamentary resolutions, including the Climate-Policy 2010–2020 and the Energy-and-Climate-Policy 2022–2032^{li}.

328. Under these frameworks, initiatives have been implemented to reduce greenhouse gas emissions and decrease dependence on oil. Progress has been achieved with regards to the heating of buildings, land transport emissions, decreased oil consumption in onshore electricity production, and reduced oil use in fisheries. Ongoing work focuses on further accelerating the green energy transition, in this process regular dialogue takes place among public authorities, stakeholders, civil society and the wider public.

List of Appendices

Data annex 1:

- 1.1 Data on hate crimes
- 1.2 Data on gender-based violations
- 1.3 Data relating to section-262a of the Criminal-Code

End Notes

- ⁱ C.f.-paragraph-21-of-Denmark's-sixth-periodic-report and paragraph-443-of-Denmark's-fifth-periodic-report.
- ⁱⁱ Inatsisartutlov-nr-36-af-04-06-2024.
- ⁱⁱⁱ Ugeskrift-for-Retsvæsen.
- ^{iv} Rigsadvokat-meddelelsen.
- ^v The-by-law-of-6-October-2023-pursuant-to-section-4(3)-of-Act-no.553-of-18-June-2012-on-the-Danish-Institute-for-Human-Rights-Part 2 "Management-of-the-Institution-The-Board".
- ^{vi} Consolidated-Act.-no.-5-of-6th-of-January-2025.: [The Consolidated Act on Gender Equality](#)
- ^{vii} Consolidated-Act.no-399-of-5th-of-April-2024: [The Consolidated Act prohibiting Discrimination in the Labour Market](#)
- ^{viii} Consolidated-Act.no.-1294-of-7th-of-November-2025: [The Consolidated Criminal Code](#)
- ^{ix} The amendments entered into force on 1 May 2021 and 1 January 2022.
- ^x Consolidated-Act.no.-1779-of-25-November-2024: [Consolidated Act on the Board of Equal Treatment](#)
- ^{xi} cdn.ast.dk/ankestyrelsen/Media/638784942896255250/Ligebehandlingsnvnets-rsberetning-2024-original.pdf (in Danish)
- ^{xii} E.g. through the 2024 podcast series 'Is this a disability?' with the view to give nuances to the typical perceptions of persons with disabilities.
- ^{xiii} Initiatives-27-28-in-the-NAPAR: [here](#)
- ^{xiv} These guidelines are not limited to cases concerning hate speech and other racist behavior.
- ^{xv} Directive-(EU)-2023/970.
- ^{xvi} Børnetelefonen.
- ^{xvii} All authorities, organizations, etc. that practically, fundamentally or ideally will be affected by the proposal, should be included in the hearing.
- ^{xviii} Act.2026-02-11.No.263.
- ^{xix} Hereinafter referred to as "the treaty".
- ^{xx} Broset-Violence-Checklist-(BVC) is a brief clinical screening tool used to assess the risk of a patient displaying violent or aggressive behavior within the next 24-hours. It is based on observation of six behavioral indicators (e.g., confusion, irritability, and threatening behavior), each of which is scored. The total score indicates the overall level of risk.
- ^{xxi} Cf.-Inatsisartut-Act-No.-8-of-20-June-2022.
- ^{xxii} Appl-no-6697/18.
- ^{xxiii} Act-No-604-of-12-June-2013-with-subsequent-changes.
- ^{xxiv} Act-No-602-of-12-of-June-2013-with-subsequent-changes.
- ^{xxv} Act-2024-06-11-No-664.
- ^{xxvi} Commissioner-of-An-Garda-Síochána.
- ^{xxvii} Den-Fælles-Dataenhed-(DFD).
- ^{xxviii} and certain other authorities.
- ^{xxix} Act-no.-473-of-12-June-2009.
- ^{xxx} <https://stm.dk/media/y5whi2ep/gr-oversigt-over-sagsomraader-en.pdf> (in Danish)
- ^{xxxi} <file:///C:/Users/B247142/AppData/Local/Temp/MicrosoftEdgeDownloads/94423c86-109f-4835-b478-ba85ea567c5c/C20230900160.pdf> (in Danish)
- ^{xxxii} 2025-price-level.
- ^{xxxiii} Paarisa is a Greenlandic public health organization. It is a unit within the Government of Greenland, operating under the Agency-for-Prevention-and-Social-Affairs. It works with health promotion and prevention within the social and health fields.
- ^{xxxiv} <https://www.ism.dk/nyheder/2025/december/politisk-aftale-sikrer-oekonomisk-godtgoerelse-til-groenlandske-kvinder-i-spiralsagen>
- ^{xxxv} See endnote vii.
- ^{xxxvi} Minimum 35-calendar-days
- ^{xxxvii} Other publicly funded monitoring and oversight bodies include the Data-Protection-Authority, the Committee-on-Media Ethics and the Faroese-Council-of-Ethics. The-Disability-Ombud has a statutory mandate to promote, protect, and monitor the implementation of the Convention-on-the-Rights-of-Persons-with-Disabilities, as well as to raise awareness of the rights of persons with disabilities. The institution operates independently and has been established with inspiration from the Paris-Principles. In addition, several non-governmental organisations supported through public funding make important contributions to the promotion and protection of human rights. These include, among others, the disability organisation MEGD and the child rights organisation Barnabati. Amnesty-International-Faroe-Islands also plays an important role in raising awareness of and promoting human rights in the Faroe Islands.
- ^{xxxviii} The-Home-Rule-Act: <https://logir.fo/Kunngerd/11-af-31-03-1948-af-Lov-om-Faeroernes-Hjemmestyre>
- ^{xxxix} <https://logir.fo/Logtingslog/132-fra-10-06-1993-um-fyrisitingarlog--om-forvaltning>
- ^{xl} The-Gender-Equality-Act: <https://logir.fo/Logtingslog/52-fra-03-05-1994-um-javnstodu-millum-kvinnur-og-menn--om-ligestilling-mellem-kvinder>
- ^{xli} <https://logir.fo/Anordning/37-fra-22-01-2002-om-ikrafttraeden-for-Faeroerne-af-lov-om-aegteskabs-indgaelse-og-oplosning> and <https://logir.fo/Logtingslog/174-fra-21-12-2021-um-broyting-i-logtingslog-um-barsilsskipan-Barsilslogin>
- ^{xlii} https://statbank.hagstova.fo/pxweb/en/H2/H2__AM__LON__LON01/lon_ul_hov_ar.px/table/tableViewLayout2/
- ^{xliii} <https://www.ammr.fo/fo/arbeidssoeki/sig-fra/um-sig-fra-verkaetlanina/heildaraetlanir>
- ^{xliv} Faroese-Criminal-Code: <https://logir.fo/Logtingslogarkunngerd/8-fra-20-02-2024-um-revsing-Revsillogin>
- ^{xlv} Annual reports from the Women's-House in Tórshavn, Faroe Islands 2022, 2023 and 2024 <https://kvinnuhusid.fo/um-okkum/adalfundir-og-nevndir/>
- ^{xlvi} Parliamentary-Act-on-Abortion: <https://www.logir.fo/Logtingslog/199-fra-09-12-2025-um-fosturtoku>. When the new Act enters into force, the Danish-Abortion-Act-of-1956 will be repealed.
- ^{xlvii} Parliamentary-Act-on-Preventive-Health-Services-for-Children-and-Young-People: <https://logir.fo/Logtingslog/63-fra-17-05-2005-um-fyribyrgjandi-heilsuskipanir-fyri-born-og-ung>

^{xlviii} Gigni: <https://www.gigni.fo/>

^{xlix} Faroese-Parliamentary-Act-on-Public-Schools: <https://logir.fo/Logtingslog/125-fra-20-06-1997-um-folkaskulan-sum-seinast-broytt-vid-logtings-log-nr-34-fra-28>. For further information: <https://namsaetlanir.fo/heilsukunnleiki-og-seksualupplysing/heilsukunnleiki-og-seksualupplysing-1-9>

^l Faroese-National-Agency-for-Education: <https://nam.fo/>

^{li} Ministry-of-Health-and-Energy: <https://www.homr.fo/fo/arbeidsoekir/orku-og-umhvoerisoeid/nattura-umhvoervi-og-lendi/umhvoerisvernd>