

**ANNEX II TO NHRI STAKEHOLDER REPORT
– ADDITIONAL RECOMMENDATIONS PERTAINING
TO DENMARK**

14 OCTOBER 2020

DOC. NO. 20/02073-3

REF. EMTH

UNIVERSAL PERIODIC REVIEW OF DENMARK 2021

Annex II supplements the individual stakeholder report by the Danish Institute for Human Rights (the Institute) to the Universal Periodic Review (UPR) of Denmark for the 38th session in April/May 2021.

A. SCOPE OF INTERNATIONAL OBLIGATIONS AND COOPERATION WITH INTERNATIONAL HUMAN RIGHTS MECHANISMS AND BODIES	2
1. Acceptance of international human rights norms	2
B. NATIONAL HUMAN RIGHTS FRAMEWORK	3
2. Establishment of an NHRI in the Faroe Islands	3
C. IMPLEMENTATION OF INTERNATIONAL HUMAN RIGHTS OBLIGATIONS	3
CROSS-CUTTING ISSUES	3
3. Business and human rights	3
4. Increased surveillance	3
5. Data retention	4
RIGHTS OF SPECIFIC PERSONS OR GROUPS	4
Women	4
6. Amendment to legislative framework on rape	4
7. Women in online debate	5
8. Women in management and leadership positions	5
9. Women in politics	5
Children	6
10. Protection against statelessness and birth right citizenship	6
11. Juvenile Delinquency Board	6
12. Protection of children	7
Persons with disabilities	7
13. Education	7
Minorities	7
14. Ethnic profiling	7
15. Interpretation services and charges	8
16. Accumulated pressure on religious minorities	8

17. Non-religious life-stance communities and freedom of religion or belief	9
18. Access to the health care system for intersex persons.....	9
Migrants, refugees and asylum seekers	9
19. Three-year restriction on family reunification	9
20. Detention conditions for rejected asylum seekers and other foreigners with no residence permit.....	10
21. Permanent residence	10

A. SCOPE OF INTERNATIONAL OBLIGATIONS AND COOPERATION WITH INTERNATIONAL HUMAN RIGHTS MECHANISMS AND BODIES

1. Acceptance of international human rights norms

Denmark has signed the International Convention for the Protection of All Persons from Enforced Disappearance and pledged to ratify it.¹ Recent changes to the Danish Extradition Act² have enabled ratification of the convention.³

Denmark is yet to ratify the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families.⁴

Denmark has ratified the International Covenant on Economic, Social and Cultural Rights and is a party to six individual communications procedures in the UN system, with the exception of the communications procedure under the Committee on Economic, Social and Cultural Rights.⁵

Recommendations:

- Without further delay, ratify the International Convention for the Protection of All Persons from Enforced Disappearance and recognise the competence of the Committee to handle individual complaints;
- Consider ratifying the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families; and
- Consider ratifying the Optional Protocol to the International Covenant on Economic, Social and Cultural Rights.

B. NATIONAL HUMAN RIGHTS FRAMEWORK

2. Establishment of an NHRI in the Faroe Islands⁶

As of October 2020, an NHRI has not been established in the Faroe Islands. Consequently, the Faroe Islands and Denmark still do not abide by the 1993 United Nations General Assembly Res. 48/134, the Paris Principles on national human rights institutions.

Recommendation:

- Denmark and the Faroe Islands take concrete steps to establish an NHRI covering the Faroe Islands.

C. IMPLEMENTATION OF INTERNATIONAL HUMAN RIGHTS OBLIGATIONS

CROSS-CUTTING ISSUES

3. Business and human rights⁷

In 2014, Denmark adopted a National Action Plan to implement the UN Guiding Principles on Business and Human Rights (UNGPs). Today, this is the oldest existing national action plan. An update was encouraged by the UN Committee on Economic, Social and Cultural Rights during its 2019 examination of Denmark.⁸

A recent analysis of 20 large Danish companies found that none of the companies assessed are currently demonstrating full alignment with their responsibility to respect human rights, as defined by the UNGPs.⁹ The average company score is 40 percent, indicating that additional measures need to be taken by both businesses and the state to ensure respect for human rights.

Recommendations:

- Develop and enforce laws that require companies to respect human rights by implementing human rights due diligence and ensuring access to remedy;
- Ensure that laws and policies governing the creation and ongoing operation of companies, such as corporate law, do not constrain but enable business respect for human rights; and
- Develop a second National Action Plan on Business and Human Rights.

4. Increased surveillance

In spring 2020, the Parliament passed a bill that allows for increased use of CCTV surveillance by the police, municipalities and private

citizens.¹⁰ Moreover, the Act increases automatic registration of license plates and makes it easier for the police to photograph individuals in the public sphere. Whilst the initiatives do not in themselves entail a violation of human rights, they represent significant interference in the individual's right to privacy.

Recommendation:

- Within the next five years, Parliament should evaluate the practical usage of the Act on CCTV surveillance.

5. Data retention

Parliament has postponed an evaluation of the Danish data retention regulations 11 times. When Parliament adopted the legal basis for data retention in 2002 it was based on the expectation that the intensive surveillance of citizens would be reviewed a few years after the data retention regulations entered into force.¹¹ Data retention constitutes indiscriminate surveillance of citizens who are under no suspicion of committing criminal activity. Thus, data retention is a significant interference with the right to privacy and the right to protection of personal data.

Recommendation:

- Carry out the revision of the Danish logging rules within the parliamentary year 2020-21.

RIGHTS OF SPECIFIC PERSONS OR GROUPS

WOMEN

6. Amendment to legislative framework on rape¹²

The current legislation on rape in Denmark is based on the notion of coercion. This means that there must be coercion in connection with the sexual act in order to punish for rape. In September 2020, a majority of the parties in the Danish Parliament agreed on amending the legislation, so that non-consensual sex constitutes rape.¹³

It is important to clarify the concept of "passivity" in relation to sexual acts in the new legislation on rape, to avoid uncertainty as to the importance of passivity by one party during the sexual act in relation to whether or not the sexual act can constitute rape.

Recommendation:

- Ensure that the concept of "passivity" in relation to sexual acts is clarified in the new legislation on rape.

7. Women in online debate

Women shy away from the public debate online more often than men.¹⁴ Increasingly, women decide not to participate in the debate because of the harsh tone. Women also experience offensive or derogatory comments that target their gender. If certain groups in a society take a less active part in the public debate both online and offline, this may compromise the basis of a democracy.

Recommendation:

- Take measures to ensure digital education and etiquette for the broader population.

8. Women in management and leadership positions¹⁵

Since 2012, large companies and all public institutions have been required to ensure women's participation on boards and at management level.¹⁶ Likewise, public institutions and companies which exceed 50 employees are required to formulate a gender policy to balance the number of women and men employed.¹⁷ While this has led to a slight increase in the proportion of women on boards from 9.6 percent in 2012 to 15.9 percent in 2017,¹⁸ in 2018 there were no women on the boards of more than half of the 1,595 largest companies in Denmark.¹⁹

Recommendations:

- Take measures to enhance and accelerate the share of women in management and leadership positions; and
- Obligate more companies to improve gender equality on boards and at management level.

9. Women in politics²⁰

The increase in female representation in Danish politics has developed very slowly over the last three elections and shows sign of stagnation. Fewer women than men are running for and elected to political office in Denmark.²¹

Recommendation:

- Take measures to enhance women's representation in politics, especially at municipal level, by motivating women to run for political positions through campaigns and supportive initiatives such as mentoring programmes.

CHILDREN

10. Protection against statelessness and birth right citizenship

According to Statistics Denmark, on 1 January 2020, 2,429 children residing lawfully in Denmark were registered as stateless. Among them, 757 were born in Denmark. Stateless children born in Denmark are entitled to Danish citizenship by naturalisation when residing lawfully in Denmark. In addition, Danish-born stateless persons aged 18 – 21 years are entitled to citizenship by naturalisation if they reside habitually in Denmark and fulfil certain other conditions. In Denmark, the granting of citizenship to Danish-born stateless persons is not regulated by an Act of Parliament, but in a circular based on a political agreement among the majority of the political parties in Parliament.²²

As of 1 February 2020, an amendment to the Danish Nationality Act has deprived children born to a Danish parent who unlawfully stay in a ‘conflict zone’ of their birth-right citizenship. A ‘conflict zone’ is defined as an area where a terrorist organization is party to an armed conflict and where there is a ban on entry and staying without prior permission or creditable purpose. Consequently, unlike all other children born to a Danish parent, such children will not automatically acquire Danish citizenship at birth, unless they would otherwise become stateless.²³ It is the opinion of the Institute that this rule contradicts a number of general nationality law principles, including the principle of non-discrimination.

Recommendations:

- Initiate amendment of the Danish Nationality Act to provide for the automatic granting of citizenship to all children born in Denmark who would otherwise be stateless; and
- Repeal the provision of the Danish Nationality Act that deprives children born in conflict zones of the right to acquire Danish citizenship at birth based on the *ius sanguinis* principle

11. Juvenile Delinquency Board

In 2019, the Juvenile Delinquency Board replaced social efforts for children in conflict with the law or under suspicion thereof. While the Institute has raised serious concerns, including over the lack of procedural safeguards for children affected by the system,²⁴ the Institute welcomes current efforts to evaluate parts of the Juvenile Delinquency Board.

Recommendation

- Take steps to introduce stronger procedural safeguards for children aged between 10-14 years in conflict with the law or under suspicion thereof.

12. Protection of children

The quality of case handling in the municipal child-protection systems is not meeting the standards provided by Danish law and by obligations in the UN Convention on the Rights of the Child (including Articles 3, 6, 12, 19).²⁵ This has a detrimental implication on children's rights to development, and their rights to be protected against abuse.

Recommendation:

- Ensure adequate human, technical and financial resources are allocated to child-protection services in every municipality.

PERSONS WITH DISABILITIES

13. Education

The level of education for persons with disabilities decreased from 2012 to 2016, whereas the level of education for persons without disabilities increased. The percentage of persons with disabilities between the age of 30-40 years who had completed vocational education or short-, medium- or long-cycle higher education was 74 percent in 2012 and 66 percent in 2016. The corresponding figures for persons without disabilities were 84 percent in 2012 and 86 percent in 2016.²⁶

Recommendations:

- Investigate the reasons for the lower completion rates for persons with disabilities; and
- Take measures to improve the level of education for persons with disabilities at all levels of education.

MINORITIES

14. Ethnic profiling

Persons with a non-Danish ethnic background are more likely to be arrested and charged for a crime they have not committed.²⁷ In 2014, the risk of being charged without a conviction for an immigrant or the descendant of a non-Western immigrant was 65-70 percent higher than for persons of Danish ethnic origin. Immigrants or descendants of immigrants with a non-Western background also had an 86-88 percent higher risk of being arrested without subsequently being convicted.²⁸

Currently, there are no guidelines or measures addressing discriminatory ethnic profiling within law enforcement in Denmark.

Recommendation:

- Ensure that the National Police develops national guidelines aimed at preventing ethnic profiling within law enforcement.

15. Interpretation services and charges²⁹

Correct and accurate interpretation is an important precondition for a well-functioning legal system and equal access to justice. The quality of the interpreter service provided by the Danish authorities is not fully at the adequate level needed to ensure that persons in need of interpreter assistance are treated fairly.

The interpreters available often lack linguistic and/or interpretation skills and professionalism. Danish lawyers and judges have described the problems they have encountered with interpreter assistance in the legal system. Some have indicated that incorrect or inadequate interpreter assistance has challenged the right to due process.³⁰

Since 2018, persons who have resided in Denmark for more than three years are charged a fee ranging between DKK 191 and DKK 1,675 (app. USD 30-260) for interpreter services in the health sector.³¹ The charge poses a barrier to equal access to physical and mental health for persons with an ethnic minority background, insufficient knowledge of Danish, and a tight financial situation.³²

Recommendations:

- Repeal legislation that warrants interpreter charges within the health sector; and
- Ensure adequate quality of interpretation in all government institutions and the courts.

16. Accumulated pressure on religious minorities

An increasing number of legislative measures has been taken which limit or potentially limit freedom of religion or belief.³³ These measures primarily affect non-Christian minorities, for instance prohibition against religious slaughtering of livestock without prior numbing,³⁴ banning face covering,³⁵ acquisition of citizenship with handshake as a requirement.³⁶

Recommendation:

- Ensure systematic involvement of, and dialogue with, relevant faith communities prior to legislative initiatives concerning religiously founded traditions and manifestations.

17. Non-religious life-stance communities and freedom of religion or belief

In 2017, Parliament adopted a new “Act regulating faith communities outside the Evangelical-Lutheran Church in Denmark” (*“Trossamfundsløven”*),³⁷ which does not include non-religious life-stance associations although these are covered by the right to freedom of religion and belief.³⁸

Recommendation:

- Take steps to regulate non-religious life-stance associations in light of freedom of religion or belief according to international human rights obligations.

18. Access to the health care system for intersex persons

Data from the European Union Agency for Fundamental Rights shows that intersex people experience discrimination in the health system in Europe.³⁹ In comparable countries in the northern Europe, this applies for around 40 percent of intersex people.⁴⁰

In addition, 62 percent of European intersex people did not provide – and were not asked for – their own or their parents’ informed consent before their first surgical treatment to modify their sex characteristics.⁴¹ No similar studies have been carried out in Denmark. In general, there is a lack of data in Denmark about intersex people and their access to the health care system.

Recommendation:

- Take steps to collect more knowledge in relation to intersex people and their access to the health care system, including the surgical procedures they receive.

MIGRANTS, REFUGEES AND ASYLUM SEEKERS

19. Three-year restriction on family reunification

In 2015, Denmark introduced a new residence permit in the Aliens Act, ‘temporary protection status’, under which asylum seekers are granted protection based on situations of general violence in their home country, rather than on grounds of individual persecution.⁴² The new status had a focus on the situation in Syria. This group of refugees are

granted a one-year residence permit, renewable each year for three years, and thereafter renewable for two years.⁴³

In 2016, further amendments to the Aliens Act barred this group of people from accessing family reunification for three years after being granted asylum, a measure that risks the right to family life.⁴⁴ The restriction is currently before the European Court of Human Rights.⁴⁵

Recommendation:

- Abolish the three-year waiting period for family reunification for persons granted temporary protection status.

20. Detention conditions for rejected asylum seekers and other foreigners with no residence permit

Rejected asylum seekers and persons who lose their residence permit in Denmark may, even if they have no criminal record, be administratively detained for up to six months,⁴⁶ with the possibility of extension of the detention period for up to 18 months if it is considered necessary in order to motivate them to cooperate with the authorities on their departure from Denmark.⁴⁷ Several human rights bodies have criticised this situation, in particular that some administrative detention facilities are prison-like, especially facilities at Ellebæk and Nykøbing Falster.^{48 49}

Recommendation:

- Reduce the length of administrative detention of rejected asylum seekers and other foreigners to as short a period as possible and only use detention as a measure of last resort.

21. Permanent residence

Requirements for permanent residence have been further tightened and now generally there is a requirement of eight years of legal stay in Denmark, including for vulnerable applicants such as persons with disabilities.⁵⁰ Other requirements relate to job experience, integration, criminal record and financial self-sufficiency.

In some cases, it can be difficult, especially for vulnerable applicants who are mentally or socially challenged, to meet the requirements,⁵¹ even though this group can be exempted from some requirements if Denmark's international obligations so demand.⁵²

Recommendation:

- Ensure that particularly vulnerable persons are not prevented from permanent residence and have full access to rights related to family reunification and citizenship.

¹ Note verbale dated 9 July 2018 from the Permanent Mission of Denmark to the United Nations to the President of the General Assembly (A/73/130), available at: <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N18/217/86/PDF/N1821786.pdf?OpenElement>.

² Act no. 117 of 11 February 2020 on extradition to and from Denmark (Extradition Act) (*Lov nr. 117 af 11. februar 2020 om udlevering til og fra Danmark (Udleveringsloven)*), available in Danish at: <https://www.retsinformation.dk/eli/lta/2020/117>

³ See para. 1 of the remarks to the bill behind the Extradition Act, bill no. L78 2019-2020, available at: <https://www.retsinformation.dk/eli/ft/201912L00078>

⁴ Relates to the implementation of recommendation: 120.5-120.10 (noted), Report of the Working Group on the Universal Periodic Review (A/HRC/32/10/Add.1), 2nd cycle, available at: <https://undocs.org/A/HRC/32/10/Add.1>

⁵ Relates to the implementation of recommendation: 120.1, 120.2 (noted), Report of the Working Group on the Universal Periodic Review (A/HRC/32/10/Add.1), 2nd cycle, available at: <https://undocs.org/A/HRC/32/10/Add.1>

⁶ Relates to the implementation of recommendation: 120.41 (supported), Report of the Working Group on the Universal Periodic Review (A/HRC/32/10/Add.1), 2nd cycle, available at: <https://undocs.org/A/HRC/32/10/Add.1> and to SDG 16.a.1 on existence of independent national human rights institutions in compliance with the Paris Principles.

⁷ Relates to the implementation of recommendation: 120.55 (accepted), Report of the Working Group on the Universal Periodic Review (A/HRC/32/10/Add.1), 2nd cycle, available at: <https://undocs.org/A/HRC/32/10/Add.1>

⁸ Committee on Economic, Social and Cultural Rights, Concluding observations on sixth periodic report of Denmark, E/C.12/DNK/CO/6, para. 18-19, available at: https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=E%2fC.12%2fDNK%2fCO%2f6&Lang=en

⁹ The Danish Institute for Human Rights, A study of 20 large Danish companies' documentation of their work with human rights, 30 September 2020, available at: <https://www.humanrights.dk/publications/danish-companies-documentation-their-human-rights-work>

¹⁰ Act amending Act on television surveillance (Strengthening security and safety, including extending access to television surveillance for private and public authorities and mandatory registration of television surveillance (*Lov om ændring af lov om tv-overvågning (Styrkelse af trygheden og sikkerheden, herunder udvidelse af adgangen til tv-overvågning for private og offentlige myndigheder samt obligatorisk registrering af tv-overvågning)*), available in Danish at: https://www.ft.dk/ripdf/samling/20191/lovforslag/l102/20191_l102_som_vedtaget.pdf

¹¹ Act no. 644 of 19 May 2020, amending Act amending the Penal Code, the Administration of Justice Act, the competition and consumer conditions in the telecommunications market, the Firearms Act, the Extradition Act and the Act on the Extradition of Offenders to Finland, Iceland, Norway and Sweden (Amendment of audit provision), (*Lov om ændring af lov om ændring af straffeloven, retsplejeloven, lov om konkurrence- og forbrugerforhold på telemarkedet, våbenloven, udleveringsloven samt lov om udlevering af lovovertrædere til Finland, Island, Norge og Sverige (Ændring af revisionsbestemmelse)*), available in Danish at: <https://www.retsinformation.dk/eli/lta/2020/644>

¹² Relates to the implementation of recommendation: 120.72 (supported), Report of the Working Group on the Universal Periodic Review (A/HRC/32/10/Add.1), 2nd cycle, available at: <https://undocs.org/A/HRC/32/10/Add.1>

¹³ Ministry on Justice, Press release, 1 September 2020, available in Danish at: <https://www.justitsministeriet.dk/pressemeddelelse/flertal-for-ny-samtykkebaseret-voldtaegtsbestemmelse/>

¹⁴ The Danish Institute for Human Rights, report on democratic participation on Facebook (*Demokratisk deltagelse på Facebook*), available in Danish with a brief English summary on pp. 10-14 at: https://menneskeret.dk/sites/menneskeret.dk/files/04_april_19/Rapport%20om%20demokratisk%20deltagelse.pdf

¹⁵ Relates to the implementation of SDG target 5.5 on ensuring women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life, indicator 5.5.2 on proportion of women in managerial positions.

¹⁶ Act no. 1288 of 19 December 2012 amending the Act on Equality between Women and Men (Target figures and policy for the gender composition of boards, etc. for state institutions and companies, etc.) (*Lov om ændring af lov om ligestilling af kvinder og mænd (Måltal og politik for den kønsmæssige sammensætning i bestyrelser m.v. for statslige institutioner og virksomheder m.v.)*), available in Danish at: <https://www.retsinformation.dk/eli/lta/2012/1288>

¹⁷ Consolidated Act no. 1678 of 19 December 2013 on Gender Equality (*Lov om ligestilling af kvinder og mænd*), section 11(4), available in Danish at: <https://www.retsinformation.dk/eli/lta/2013/1678>

¹⁸ The Danish Business Authority, Evaluation report on the law on target figures and policies for the underrepresented gender (*Evalueringsrapport om lov om måltal og politikker for det underrepræsenterede køn*), 2017, available in Danish at: https://erhvervsstyrelsen.dk/sites/default/files/201902/180921_evaluation_af_maaltal_og_politikker_2018.pdf

¹⁹ The Danish Institute for Human Rights: Gender – Status 2019 (*Køn – Status 2019*), page 31, available in Danish with a brief English summary on pp. 7-8 at: <https://www.humanrights.dk/publications/gender-status-2019>

²⁰ Relates to the implementation of SDG target 5.5 to ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life, indicator 5.5.1. on proportion of seats held by women in national parliaments and local governments.

²¹ Statistics Denmark, Elections, available in Danish at: <https://www.dst.dk/da/Statistik/emner/befolkning-og-valg/valg>

²² Circular no. 9879 of 14 September 2018 with later amendments <https://www.retsinformation.dk/eli/retsinfo/2018/9779>

²³ Act no. 63 of January 28, 2020, on amendment of the Act on Danish citizenship and the Act on the foreign service (Children's acquisition of citizenship in areas with restrictions on entering and staying etc.) (*Lov om ændring af lov om dansk indfødsret og lov om udenrigstjenesten ((Børns erhvervelse af statsborgerskab i områder med indrejse- og opholdsforbud, vandelskrav for bipersoner, fortabelse af dansk indfødsret og begrænsning af adgang til bistand fra udenrigstjenesten m.v.))*), available in Danish at: <https://www.retsinformation.dk/eli/lta/2020/63>

²⁴ The Danish Institute for Human Rights, public consultation response, 10 October 2018, available in Danish at: https://menneskeret.dk/sites/menneskeret.dk/files/10_oktober_18/hoeringssvar_vedr._udkast_til_forslag_til_lov_om_bekaempelse_af_ungdomskriminalitet_og_aendring_af_lov_om_social_service_lov_om_voksenansvar_for_anbragte_boern_og_unge_og_lov_om_socialtilsyn.pdf

²⁵ National Social Appeals Board, Children's case barometer (*Børnesagsbarometeret*) 2020. July 2020, pp. 10-16, available at: <https://ast.dk/publikationer/bornesagsbarometeret-2020>

²⁶ The Danish Institute for Human Rights, Persons with disabilities barometer (*Handicapbarometeret*), available in Danish at: <https://handicapbarometer.dk/>

²⁷ Statistics Denmark, A special release for The Danish Broadcasting Corporation (DR) on Statistics Denmark's population registers regarding arrests, detention, charges and convictions linked to information on origin from population statistics, 2018, available in Danish at:

<https://www.dst.dk/ext/formid/saerkoersel-dr--xlsx>

²⁸ Justice Committee of the Danish Parliament (*Retsudvalget*), Open council with the Minister of Justice, 23 May 2018, available in Danish at:

<https://www.ft.dk/udvalg/udvalgene/reu/kalender/35752/samraad.htm>

²⁹ Relates to the implementation of recommendation: 120.161 (Supported), Report of the Working Group on the Universal Periodic Review (A/HRC/32/10/Add.1), 2nd cycle, available at:

<https://undocs.org/A/HRC/32/10/Add.1>

³⁰ The Danish Institute for Human Rights, report on interpretation in the justice system (*Tolkning i retsvæsenet*), November 2015, p. 8, available in Danish at: <https://menneskeret.dk/udgivelser/tolkning-retsvaesenet>

³¹ Consolidation Act no. 855 of 23 June 2018 on interpretation assistance under the Health Act (*Bekendtgørelse om tolkebistand efter sundhedsloven*), available in Danish at:

<https://www.retsinformation.dk/eli/lta/2018/855>

³² The Danish Institute for Human Rights, report on self-payment of interpreting assistance - doctors' experiences with the scheme (*Egenbetaling for tolkebistand – lægers erfaringer med ordningen*), 2019, available in Danish with a brief English summary on pp. 31-32 at:

https://www.laeger.dk/sites/default/files/egenbetaling_tolkebistand.pdf

³³ "Limitations to Freedom of Religion or Belief in Denmark", Eva Maria Lassen, Religion & Human Rights, Volume 15 (2020): Issue 1-2, pp. 134-152,

<https://brill.com/view/journals/rhrs/15/1-2/rhrs.15.issue-1-2.xml>

³⁴ Consolidation Act no. 135, on slaughter and killing of animals (*Bekendtgørelse om slagting og aflivning af dyr*), 14 February 2014, available in Danish at:

<https://www.retsinformation.dk/eli/lta/2014/135>

³⁵ Act no. 717 of 8 June 2018 on amending the Penal Code (Prohibition to cover) (*Lov om ændring af straffeloven (Tildækningsforbud)*), No. 7178 June 2018, available in Danish at:

<https://www.retsinformation.dk/eli/lta/2018/717>

³⁶ Act. no. 1735 of 27 December 2018 amending the Act on Danish citizenship and the Act on Danish education for adult foreigners and others (Provision to the municipal councils of constitutional ceremonies, increase of the fee for applying for Danish citizenship by

naturalization and attachment in accordance with further rules on aliens' absence from teaching Danish, etc.) (*Lov om ændring af lov om dansk indfødsret og lov om danskuddannelse til voksne udlændinge m.fl. (Henlæggelse til kommunalbestyrelserne af grundlovsceremonier, forhøjelse af gebyr for ansøgning om dansk indfødsret ved naturalisation og fastsættelse af nærmere regler om udlændinges fravær i undervisning i dansk m.v.)*), available in Danish at:

<https://www.retsinformation.dk/eli/lta/2018/1735>

³⁷ Act no. 1533 of 19 December 2017 on faith communities outside the State church (*Lov om trossamfund uden for folkekirken*), available in Danish at: <https://www.retsinformation.dk/eli/lta/2017/1533>

³⁸ Report of the Special Rapporteur on freedom of religion and belief on his mission to Denmark, A/HRC/34/50/Add.1, para. 44, available at: <https://undocs.org/A/HRC/34/50/Add.1>

³⁹ The European Union Agency for Fundamental Rights (FRA), report on A long way to go for LGBTI equality (2020), p. 20, available at: https://fra.europa.eu/sites/default/files/fra_uploads/fra-2020-lgbti-equality_en.pdf

⁴⁰ Data retrieved from the European Union Agency for Fundamental Rights (FRA) LGBTI Survey II (2020), available at: <https://fra.europa.eu/en/data-and-maps/2020/lgbti-survey-data-explorer>

⁴¹ The European Union Agency for Fundamental Rights (FRA), report on a long way to go for LGBTI equality (2020), p. 53, available at: https://fra.europa.eu/sites/default/files/fra_uploads/fra-2020-lgbti-equality_en.pdf

⁴² Act no. 153 of 18 February 2015 amending the Danish Aliens Act, available in Danish: <https://www.retsinformation.dk/eli/lta/2015/153>

⁴³ Consolidation Act no. 1020 of 23 June 2020 on foreigners' access to Denmark, section 16, subsection 1, available in Danish at: <https://www.retsinformation.dk/eli/lta/2014/1021>

⁴⁴ Ministry of Immigration and Integration, Act no. 102 of 3 February 2016 amending the Danish Aliens Act, available in Danish: <https://www.retsinformation.dk/eli/lta/2016/102>.

⁴⁵ M.A. v. Denmark, Application no. 6697/18 (pending), press release, European Court of Human Rights, 10 June 2020, <https://hudoc.echr.coe.int/eng-press#%22fulltext%22:%226697/18%22,%22sort%22:%22kupdate%20Descending%22%22%22>},

Web page of the Danish Institute for Human Rights, <https://menneskeret.dk/nyheder/sag-ved-menneskerettighedsdomstolen-familiesammenfoering-tre-aar-lang-tid-vente>

⁴⁶ Consolidation Act no. 1022 of 2 February 2019, referred to as the Danish Aliens Act, section 36, available in Danish at:

<https://www.retsinformation.dk/eli/lt/2019/1022>

⁴⁷ Consolidation Act no. 1022 of 2 February 2019, referred to as the Danish Aliens Act, section 37, subsection 8, available in Danish at:

<https://www.retsinformation.dk/eli/lt/2019/1022>

⁴⁸ Committee against Torture, concluding observations on the combined sixth and seventh periodic reports of Denmark, CAT/C/DNK/CO/6-7, 4 February 2016, para 24, available at:

<https://undocs.org/CAT/C/DNK/CO/6-7>

⁴⁹ Council of Europe's Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment Report to the Danish Government on the visit to Denmark carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT), 7 January 2020, available at:

<https://rm.coe.int/1680996859>

⁵⁰ Ministry of Immigration and Integration, Act no. 102 of 3 February 2016 amending the Danish Aliens Act, available in Danish:

<https://www.retsinformation.dk/eli/lt/2016/102> and Act No. 436 of 9

May 2017 amending the Danish Aliens Act, available in Danish:

<https://www.retsinformation.dk/eli/lt/2017/436>

⁵¹ The Danish Institute for Human Rights, consultation response, 15 February 2017, available in Danish at:

https://menneskeret.dk/sites/menneskeret.dk/files/02_februar_17/hoeringssvar_udkast_til_forslag_til_lov_om_aendring_af_udlaendingeloven_skaerpelse_af_reglerne_om_tidsbegrænset_opholdstilladelse.pdf

⁵² The Danish Immigration Service, web page, available at:

<https://www.nyidanmark.dk/en-GB/Applying/Permanent%20residence%20permit/Permanent%20residence>