

**List of Issues Prior to Reporting  
Submissions by The National  
Council for Children, Denmark,  
July 2025**

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## Introduction

The Danish National Council for Children is an independent body, both politically and financially. It was established in 1994 and is composed of a chair and eight members. The Council forms one of the three pillars of the Danish ombud system for children and represents the Danish children's ombud internationally.

Since Denmark's last reporting to the Committee in 2017, the Council has experienced a period of turbulence and transition. Following its relocation from Copenhagen to Billund in 2017 due to a political decision, the Council has faced persistent structural challenges, including frequent changes in chairpersons and underfunding. These factors have limited its ability to fully realise its mandate at a time when the conditions of childhood and youth in Denmark have grown significantly more complex. While most children in Denmark enjoy good living conditions, there are still far too many instances where children's rights are overlooked, neglected, or violated.

This situation is compounded by a growing gap between Denmark's obligations under the UN Convention on the Rights of the Child and recent legislative and structural developments. The council is particularly concerned about a tendency to turn from a child rights-based approach towards policies focused on control and sanctions - especially concerning children in vulnerable situations. This trend is evident in the establishment of Youth Crime Boards, the expanded frames for use of force towards children in institutions and proposals for "emergency schools" that enable rapid exclusion from the mainstream education system. Children exhibiting distress or disruptive behaviour are increasingly viewed through a punitive lens, rather than as individuals in need of support, protection, and care.

At the same time, we acknowledge progress in certain areas - most notably the adoption of the new Child's Act (*Børnelov*), which reinforces children's right to be heard and involved in matters affecting them. However, these advancements stand in sharp contrast to the more punitive direction taken among others in juvenile justice and education policies. This fragmented policy landscape reflects a lack of coherent and coordinated implementation of children's rights across sectors.

As Denmark's national institution for children's rights, the Danish National Council for Children stresses that all children must be consistently recognised and treated as rights-holders - entitled to protection, participation, provision and equal treatment, regardless of their background or circumstances. Fulfilling this commitment requires both political will and the allocation of sufficient resources to ensure children's rights.

**Børnerådet, July 2025**

## General measures of implementation (art. 4, 42, 44 (6))

### Status of the convention

Denmark has not taken steps to incorporate the Convention and its Optional Protocols into national legislation and has not expressed any intention to do so, despite the recommendations of the Committee in 2017. Proposals for incorporation of the convention submitted by opposition parties have not received the government's support<sup>1</sup>. The government has neither taken direct initiatives to promote the application of the Convention by the courts and administrative decision-making bodies.

- How will the government ensure compliance with the Convention on the Rights of the Child if it continues to have no intention of fully incorporating it into Danish legislation?
- How will the government ensure that – and monitor whether – the Convention is used as a legal source by courts and administrative bodies?

### Legislative process, necessary resources and complaint mechanisms

Denmark has increasingly accelerated legislative procedures, often shortening consultation deadlines. This disproportionately affects smaller organisations, NGOs, and independent experts, making it difficult to deliver well-founded, child-focused responses<sup>2</sup>.

Among other things that means, that there is a risk that the government does not obtain the necessary child-specific expertise to ensure that the best interests of the child are reflected in the legislation.

Denmark has a focus on reducing public expenses<sup>3</sup> and recently announced further cut-backs in the central administration<sup>4</sup>. These austerity measures raise concerns regarding the State's capacity to uphold and advance the rights of the child, particularly for vulnerable groups. The Committee on the Rights of the Child has previously urged Denmark to assess the impact of such measures on the realization of children's rights and to implement safeguards to mitigate potential adverse effects.

Furthermore, Denmark has still not implemented a systematic requirement to carry out Child Rights Impact Assessments (CRIA) as part of the legislative process. This means there is

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<sup>1</sup> Folketinget (2023): *B 141 – Forslag til folketingsbeslutning om inkorporering af FN's børnekonvention i dansk ret.*

<sup>2</sup> K-News (2021): *Korte høringsfrister truer retssikkerheden.*

<sup>3</sup> Social- og Boligministeriet (2024): *Ekspertudvalgets anbefalinger på det specialiserede socialområde.*

<sup>4</sup> Finansministeriet (2025): *Regeringen lancerer statsligt arbejdsprogram med administrationsbesparelser.*

a risk of overlooking the legal, economic, or social direct or indirect consequences that a proposed law might have for children.

- How will the government work to involve children in the process of implementing the principles of the Convention across different areas of law and on different (municipal, regional and national levels)?
- Can the government clarify what concrete measures have been taken to ensure the systematic use of Child Rights Impact Assessments (CRIA) in the legislative process?
- What steps will the government take to ensure that the best interests of the child are taken into account in the development of new legislation and in budget planning at the national, regional, and municipal levels?
- How does the government intend to support municipalities and regions to ensure that children's rights are upheld consistently across the country, despite differences in financial resources?
- How will the government ensure that legislation about children's rights is respected — for example through oversight and real complaints mechanism in various settings where children live?
- How will the government ensure sufficient participation of child rights experts and civil society actors in legislative consultations, including through appropriate timeframes?

### **A rights-based view of children across legislation**

The weight given to children's rights varies significantly across different areas of Danish law and especially implementation of a rights-based approach to children varies across different legislative frameworks.

In 2024, the Child's Act (Barnets lov) entered into force<sup>5</sup>. In this law, children are explicitly recognized as subjects of rights to a greater extent than in the previous Social Services Act (*Lov om Social Service*) and other legislation, such as education law. The Danish National Council for Children believes that including a rights-based view of children in legislation is important for ensuring that children's rights are respected<sup>6</sup>. This is especially important be-

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<sup>5</sup> Lov nr. 282 af 17. marts 2025.

<sup>6</sup> Børnerådet (2023): *Børnesyn i folkeskolen*.

cause Denmark has not fully incorporated the Convention on the Rights of the Child into national law. Specific legislative frameworks must therefore make these rights visible and enforceable.

- Does the government intend to develop a comprehensive strategy for the realisation of children's rights, supported by an action plan for its implementation, evaluation and follow up across different legislative frameworks?
- To what extent can the government commit to all Danish legislation being based on a rights-based and contemporary view of children, where children are regarded as independent rights holders with the right to be heard, protected, and respected?

### **Conditions for an independent children's rights institution**

Denmark does not have an independent Children's Ombudsperson, like our neighbours in Sweden and Norway. Instead, Denmark has a National Council for Children, whose mandate in some areas resembles that of the Norwegian and Swedish ombudspersons. However, the Danish setup differs significantly: the Council operates with substantially fewer financial resources than its Scandinavian counterparts and is led by a chairperson employed on a part-time basis —15 hours per week<sup>7</sup>.

The National Council for Children is a part of a child ombuds collaboration (*børneombudssamarbejdet*) that also includes the Parliamentary Ombudsman and the NGO Children's Welfare (*Børns Vilkår*). The ambition for the model is to build on the specific strengths and mandates of each of the three institutions. However, The National Council for Children has found that it is challenging to fully realise this ambition, as the three organizations have different possibilities and limitations when it comes to advocating for children and to promote and protect children's rights under the Convention

All things considered, Denmark lags behind countries such as Norway and Sweden when it comes to having the necessary conditions for an independent children's rights institution (ICRI).

Moreover, it should be noted that Denmark has not taken steps to strengthen the coordination and evaluating of the implementation of the convention and any considerations of establishing a single coordinating body have either not been initiated or have not materialized, although it was recommended by the Committee in 2017.

- How will the government ensure effective monitoring of the implementation of the Convention?

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<sup>7</sup> Børnerådet (2024): *Fremtidens Børneråd*

- In what way does the government intend to ensure that Denmark can systematically follow up on how children's rights are met and realised in practice?
- Will the government commit to establishing a fully independent children's rights institution with the mandate and resources to promote, protect, and advocate for children's rights under the Convention?

### **Knowledge of children's rights**

Studies reveal challenges regarding both children's and adults' knowledge of the rights enshrined in the Convention on the Rights of the Child. For example, a 2023 study shows that children's awareness of their own rights is declining. Only 38% of children in grades 6 to 10 consider themselves to have some or good knowledge of children's rights<sup>8</sup>. This is problematic because knowledge of rights gives children better conditions to speak up when something is wrong and strengthens their ability to take care of themselves, others, and the communities they are part of.

- How will the government work to ensure that more children are made aware of their rights under the Convention?
- Who holds the responsibility for promoting knowledge of children's rights among both children and adults?

## **General Principles (art. 2-3, 6 and 12)**

### **Non-discrimination (art. 2)**

#### **Protecting vulnerable children from discrimination**

All children must be protected from discrimination in all settings. More than half of the students with non-Western backgrounds have experienced bullying related to skin colour, nationality, religion, or culture in the school system. In addition, students with ethnic minority backgrounds report more frequent degrading treatment by teachers, including a harsher tone and lower academic expectations<sup>9</sup>.

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<sup>8</sup> Unicef og Institut for Menneskerettigheder (2023): *Børn har begrænset kendskab til deres rettigheder*.

<sup>9</sup> Institut for menneskerettigheder og Børns Vilkår (2024): *Etnicitet og mobbedynamikker*.



Structural discrimination is also documented across day care, school and youth education. Children face stereotypical expectations based on disabilities, identifying as LGBT+ or gender. The Danish Expert Group on Gender highlights how the interplay between gender, ethnicity, and social conditions may create double or triple exposure — often reinforced by professionals' unconscious bias. The group also highlights that several research projects shows that as early as in daycare children are being treated differently based on the gender. Children are continuously exposed to expectations based on their gender, socio-economic background and other factors combined. This is with the risk of locking students in certain positions that may hinder their personal and academic development<sup>10</sup>.

Children also risk facing structural discrimination outside the school setting— for example related to the social benefits system in Denmark. Children in families where one or both parents are on transfer payment schemes with particularly low benefit levels designed to incentivise adults with an ethnic minority background to enter the labour market, could result in discrimination against children based on their parents' ethnic origin<sup>11</sup>. These children risk facing not only material and social inequalities, but also state-sanctioned discriminatory mechanisms that can restrict their opportunities for equal participation and a safe upbringing.

- How does the government ensure targeted protection for children belonging to ethnic minorities, LGBTQ+ children, and other particularly vulnerable groups of youth within the primary and lower secondary school system?
- What training and awareness-raising initiatives have been implemented for teachers, social workers, law enforcement officials and other professionals to identify and counteract unconscious bias, structural discrimination and intersecting forms of disadvantage affecting children?
- How does the government ensure children are protected from direct and indirect discrimination in all settings, including education, housing, health and the benefits system, particularly on the grounds of ethnic origin, gender, disability, migration status and sexual orientation or gender identity?
- How does the government monitor and prevent the discriminatory effects of socio-economic and immigration-related policies — including special housing legislation, and differentiated social benefit levels — on children from ethnic minority backgrounds?

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<sup>10</sup> Børn- og undervisningsministeriet (2024): *Rapport fra ekspertgruppen om køn: Anbefalinger fra ekspertgruppen om betydningen af køn for faglig udvikling, læring og trivsel i dagtilbud, folkeskole og på ungdomsuddannelse.*

<sup>11</sup> Børnerådet (2024): *Lovforslag mangler kortlægning af potentielt alvorlige konsekvenser for børn.*

### **The right to education for children in vulnerable situations**

Several studies have shown that many children who receive education at a school within a day treatment programme or a residential care facility have not received education of sufficiently high quality. Significant challenges have been identified in ensuring compliance with the rules set out in the Danish Folkeskole Act. As a result, municipalities have not adequately fulfilled their legal responsibility towards these highly vulnerable students<sup>12</sup>.

In 2022, a political agreement was made to strengthen the municipal responsibility for ensuring appropriate schooling within day treatment programmes and residential care settings. However, preliminary supervision of the implementation of this strengthened responsibility continues to reveal serious shortcomings. Consequently, there remains a high risk that many children do not receive the education to which they are entitled under the Folkeskole Act and therefore lack the necessary foundation for further education<sup>13</sup>.

- What will the government do to ensure that children receiving education in a day treatment programme or residential care facility are provided with the education they are entitled to and that prepares them for further education?

### **The right to education for children in alternative care**

Children in alternative care have the same rights as all other children to free, high-quality education, but they differ significantly from their peers outside the system. Nearly 70% of children in alternative care do not complete primary school, and those who do tend to achieve lower academic results compared to their non-care peers. In addition, 78% of children aged 11–17 in alternative care experience at least one change of primary school — a stark contrast to just 9% among children of the same age group who are not in alternative care<sup>14</sup>. A recent amendment to the Social Care Inspection Act (*Socialtilsynsloven*) has further reduced the focus on supporting foster families in creating educationally supportive environments for children.

- How will the government ensure that children in alternative care will receive the necessary support to complete primary school and pursue further education?

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<sup>12</sup> Børne- og undervisningsministeriet (2018): *Ny undersøgelse om de interne skoler peger på mangler i skoletilbuddet* og Den tværministerielle arbejdsgruppe (2021): *Styrkelse af specialundervisningen på interne skoler i dagbehandlingstilbud og på anbringelsessteder*.

<sup>13</sup> Børne- og undervisningsministeriet (2025): *Tilsyn med kvalitetsaftaler på behandlings- og specialundervisningstilbud og specialundervisningstilbud på børne- og ungehjem*.

<sup>14</sup> Børns Vilkår (2024): *Svigt af Børn i Danmark*.

## **Respect for the views of the Child (art. 12)**

### **Respect for the views of the child in political decision making**

Denmark has no public authority that collects data on child participation in policymaking<sup>15</sup>. Children's perspectives are only rarely and inconsistently included in political decision-making at both national and municipal levels<sup>16</sup>. There is a general lack of strategic focus on ensuring the systematic involvement of children in the development and assessment of laws, policies and programs that affect them<sup>17</sup>. Child participation is often treated as a symbolic gesture rather than a structural element of democratic processes. Public authorities frequently lack both the mandate and the methodological expertise to carry out meaningful participatory processes with children.

In addition to national regulations and legislation, children are significantly impacted by decisions made at the municipal level. Areas such as daycare services, schools, and social interventions for children in vulnerable situations fall under municipal responsibility. Therefore, it is essential that the perspectives of children are incorporated into the decision-making processes in the municipalities as well as legislative processes at the national level in the Danish Parliament. At present, there is considerable variation between municipalities regarding the establishment of bodies such as children's and youth councils to facilitate the involvement of children<sup>18</sup>.

- What measures are taken to ensure that children's views are systematically heard and given due weight in national and local policymaking and how is such participation systematically monitored and evaluated?
- How does the government plan to establish structural mechanisms, including dedicated resources, to support meaningful and ongoing child participation in political processes?

### **Respect for the views of the child in education**

In 2024, a political agreement was reached to replace the current Common Goals (*Fælles Mål*) with more streamlined and simplified curricula for school subjects.

The new curricula are scheduled to enter into force in the 2027/2028 school year. In connection with this reform, we the National Council, in collaboration with the National Union of

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<sup>15</sup> European Commission/EACEA (2023): *Youth Wiki – 5.4 Unges deltagelse i politiske beslutningsprocesser: Danmark*.

<sup>16</sup> Børnerådet (2021): *HØR GODT EFTER! Del 1 - kortlægning af kommunal børneinddragelse*.

<sup>17</sup> Socialt Indblik (2025) *Børn har krav på reel inddragelse i samfundet*, [Podcast afsnit 103].

<sup>18</sup> UNICEF et. al. (2023): *Notat til Folketingets Indenrigsudvalg om lovpligtige ungdomsråd i kommunerne m.fl.*

School Students and UNICEF Denmark, conducted a survey on students' experiences of participation and influence in their education. Since school is the setting where children spend the most time it is significant that the study revealed a clear correlation between students' perception of having influence and their overall happiness and motivation in school. It is therefore concerning that 6 out of 10 students report that they rarely or never have a say in the selection of topics covered in class<sup>19</sup>.

- How will the government ensure that students' views are systematically heard and given due weight in all aspects of school life — including teaching practices, curriculum development, and broader decision-making — in accordance with Article 12 of the Convention on the Rights of the Child?

### **Respect for the child's views in cases of dismissal from independent schools**

In 2014, the Danish Parliamentary Ombudsman raised concerns with the Ministry of Children and Education regarding shortcomings in students' right to be heard in cases of dismissal from independent primary schools. Between 2016 and 2021, the Ministry took a number of steps to address the issue, including strengthening its guidance and, most recently, incorporating Article 12 of the UN Convention on the Rights of the Child directly into legislation governing independent schools. Despite these efforts, challenges remain, as some students continue to be expelled without being involved prior to the decision. These challenges are further exacerbated by the fact that independent schools are not subject to key administrative law, including requirements for documentation, reasoning of decisions and guidance on appeals.

- Which further steps will the government take to ensure that students are heard when an independent primary school is considering expelling them?

### **Respect for the views of the vulnerable children**

Recent studies indicate that authorities continue to face challenges in fulfilling their obligations to involve children in decisions concerning their own matters or their cases<sup>20</sup>. Children with disabilities or special needs are often only included to a limited extent in decision-making processes that affect them. Some refrain from participating altogether due to previous negative experiences or low expectations of being heard. Research highlights that these children frequently lack influence over both the content and structure of meetings, and that their participation is often constrained by communication or social challenges. Moreover,

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<sup>19</sup> Børnerådet (2024): *Medbestemmelse i undervisningen*.

<sup>20</sup> Ankestyrelsen (2024): *Børnesagsbarometret*.

they experience being reduced to their limitations, with little attention given to their views, preferences or agency<sup>21</sup>.

In 2024, the Child's Act (*Barnets Lov*) entered into force with the explicit aim of strengthening children's rights, including their right to have their views heard and given due weight in all decisions affecting them, in line with Article 12 of the UN Convention on the Rights of the Child. While the legislation marks a significant step towards formalising children's participation rights, the practical implementation of these provisions is still evolving and will require close monitoring.

- How does the government plan to ensure that children with special support needs, including those with disabilities, chronic illness or in alternative care, are effectively heard and involved in decisions affecting them?

### **Respect for the views of the child in preparing potential crises**

In recent years, the risk of new crises has increased. After COVID-19, we have become acutely aware that a new pandemic could emerge. It is also widely recognized that extreme weather events will become more frequent, and that the current geopolitical situation may create instability and affect national security and supply chains<sup>22</sup>. During times of crisis, children are particularly vulnerable, and it is crucial to place special emphasis on respecting and protecting their rights.

During the COVID-19 crisis in Denmark (2020–2021), children were not involved in decisions before or during the national lockdown. This has shown the importance of being better prepared next time. However, the Government has not yet presented a national strategy for how children will be formally involved before and during a future crisis.

- What specific measures will the Government take to ensure that children are systematically involved in decision-making processes before and during future crises?

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<sup>21</sup> Bengtsson, Tea T. og Henze-Pedersen, S (2022): *Børn og unges inddragelse i myndighedssagsbehandling på børne- og ungeområdet. En vidensindsamling under Videnscenter om børneinddragelse og udsatte børn*, VIVE.

<sup>22</sup> Beredskabsstyrelsen (2025): *Forberedt på kriser*.

## Best interests of the child (art. 3)

### Structural settings and legislation affecting children negatively

There is a shift in many areas, to a political tendency where children are viewed as problems or violators instead of children in need of help. Often the suggested solution regarding children who are showing problematic behaviour is to isolate the children in question and remove them from the community they are a part of, e.g. schools. Instead, the focus should be on how to create the right conditions to safeguard the best interests of children in schools and daycare, and on fostering a shared understanding that this requires appropriate frameworks and financial resources.

Furthermore, the government has announced a reduction of 6,500 government positions<sup>23</sup>, including cutbacks in supervision and control across various areas of public institutions that might affect children directly or indirectly.

- How will the government ensure that the best interest of the child is defined on individual level in a specific situation and not by society norms or political views?
- How will the government ensure that the children's best interests are held high when continuously deciding cutbacks on resources?
- How will the government guarantee a shift in focus on children from reactions to prevention?
- How will the government ensure that children are seen as rights holders in every aspect of their lives?

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<sup>23</sup> Finansministeriet (2025): *Regeringen lancerer statsligt arbejdsprogram med administrationsbesparelser.*

## Civil Rights and Freedoms (arts. 7-8 and 13-17)

### International adoption

Denmark has throughout the years received many children to be adopted by Danish parents. Research has shown that many international adoptions may well have been illegal due to the lack of consent from the biological parent(s). While Denmark has now put a stop to international adoptions, the rights of already adopted children—including the right to know their origins and access legal redress—remain unaddressed in the current political agreement<sup>24</sup>.

- How will the government help adopted children to seek out their origin?
- How will the government ensure legal justice for the children adopted throughout the years by Danish parents?
- How will the government ensure that a future model for international adoption is in accordance with the rights of the child?

### Children born by surrogacy and by donor

The dilemmas of surrogacy are many. It includes the rights of the child not to be trafficked when a third party as a part of a surrogacy agreement received payment, and the right to know its origin. The Danish parliament has amended legislation<sup>25</sup> that makes it possible for Danish couples to make international agreements on paid surrogacy. The changes were made in spite of the recommendations from among others The National Institute for Human Rights and the National Council for Children<sup>26</sup>. In Denmark it is illegal to pay a Danish surrogate mother or surrogacy agency. The agreements made outside of Denmark are not subject to approval by Danish authorities but rely solely on the national regulation in the country where the agreement is made. This is highly questionable when it comes to legal certainty.

Children born with the help of a donor experience a lot of the same barriers as children born by surrogacy. Many donor-conceived children do not have access to information about

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<sup>24</sup> Social- og Boligministeriet (2025): *Ny aftale om en samlet indsats på adoptionsområdet*.

<sup>25</sup> Social- og Boligministeriet (2024): *Aftale om børns ret til deres forældre ved surrogataftaler* og Folketinget (2025): *L 65 – Forslag til lov om ændring af adoptionsloven og lov om Det Centrale Personregister (Opfølgning på aftale om en samlet indsats på adoptionsområdet m.v.)*.

<sup>26</sup> Digitaliserings- og Ligestillingsministeriet (2023): *Rapport fra ekspertgruppe om anerkendelse af forældreskab ved kommercielle surrogataftaler*.

their donor and siblings, which can lead to identity struggles and frustration. There is often no access to information on genetics and health.

- How will the government ensure children's right to know their origin in cases of adoption, surrogacy or donor conception?

### **Children's rights in the digital environment**

As a result of increasing digitalization and children's use of social media and other online platforms, several issues arise concerning children's rights online.

Children are at risk of digital violations<sup>27</sup>, manipulative retention mechanisms, and breaches of their privacy due to a lack of control over their personal data<sup>28</sup>. Furthermore, many children lack sufficient digital literacy and awareness of their rights to actively manage their data and to enjoy safe and inclusive digital environments<sup>29</sup>.

- How will the government contribute to strengthening EU-level regulation of tech giants' business models to better protect children's rights?
- How will the government ensure that all children are adequately equipped for digital life, in accordance with their rights under the Convention on the Rights of the Child?

## **Violence Against Children (arts. 19, 24 (3), 28 (2), 34, 37 (a) and 39)**

### **Violence and sexual abuse against children**

The state has initiated several measures to prevent and address violence and abuse against children, including the Government's Abuse Action Plan (*Overgrebspakken*) in 2013 and the Child's Act (*Barnets lov*) of 2024.

Despite these initiatives, national data suggest that violence and sexual abuse against children remain widespread and stable over time. A national survey from 2025 indicates that approximately one in six children has been exposed to physical or psychological violence by

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<sup>27</sup> Red Barnet (2024): *Børn og unges erfaringer med digitale krænkelse og andre ubehagelige oplevelser online*.

<sup>28</sup> Konkurrence- og Forbrugerstyrelsen (2025): *Young consumers and social media*.

<sup>29</sup> Børns Vilkår og Medierådet for Børn og Unge (2019): *Digital dannelse i børnehøjde*.



one of their closest adult caregivers<sup>30</sup>, and 1.5%<sup>31</sup> of the adult population has experienced sexual abuse by close family members during childhood<sup>32</sup>.

At the same time, a network of civil society organizations and professionals has identified significant challenges, including insufficient systematic detection and prevention mechanisms, inconsistent municipal practices, and lack of knowledge on effective interventions and their implementation<sup>33</sup>.

- When does the government intend to adopt a comprehensive national strategy for the prevention and elimination of violence against children and how will this strategy include measurable goals, time-bound action plans, and ensure the systematic participation of children?
- What measures have been taken to prevent and respond to violence and abuse against children? Specifically, what is being done regarding awareness campaigns, early detection through health and maternity services, and treatment programs for perpetrators and how are these measures coordinated, monitored, and evaluated at the national level?

### **Protection against psychological violence**

Psychological violence can be as harmful as physical violence<sup>34</sup>, yet it remains difficult to detect and prevent. Despite its criminalisation in 2019, professionals and the general public lack knowledge and tools to identify and respond to psychological violence. Few cases reach the justice system, reflecting persistent gaps in awareness and implementation<sup>35</sup>.

It is also important to underline that the criminal provision on psychological violence solely applies to acts committed within close relationships. As such, the legislation does not provide protection from psychological violence committed by adults outside the family context. This includes instances in schools, daycare institutions, leisure settings, alternative care and

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<sup>30</sup> Børns vilkår (2025): *Vold mod børn i Danmark 2025 Omfang af fysisk og psykisk vold mod børn i 8. klasse*.

<sup>31</sup> 0.6 per cent have experienced that a family member exposed themselves to the young person, or that the young person was made to expose themselves to others, without their consent. 0.9 per cent have experienced that a family member touched them, made them touch themselves, or others, without their consent. 0.4 per cent have experienced that a family member attempted or completed sexual intercourse — vaginal, oral, or anal — without their consent.

<sup>32</sup> Ottosen, M. H. og Henze-Pedersen, S. (2021): *Fysisk vold og seksuelle overgreb mod børn*, VIVE.

<sup>33</sup> Social- og Boligstyrelsen (2025): *Hvorfor lykkes vi ikke bedre med at bekæmpe vold og seksuelle overgreb mod børn?*

<sup>34</sup> Ottosen, H. (2019): *Psykisk vold mod børn i hjemmet*, VIVE.

<sup>35</sup> Lev Uden Vold (2024): *Psykisk vold - Retspraksis fem år efter kriminaliseringen*.

other environments where children interact with adults in positions of authority. Consequently, children exposed to psychologically harmful treatment in these settings fall outside the scope of criminal protection, leaving significant gaps in safeguarding and access to justice.

- What concrete measures does the government take to prevent and protect children from psychological violence across all settings, including schools, early childhood institutions, leisure settings, and family life?
- How is legislation effectively enforced in practice, including by social services, the police, and the judiciary?

### **Equal and timely support regardless of place of residence**

Research reveals disparities in how municipalities respond to cases of violence and abuse against children. Data from the Danish Children's Houses<sup>36</sup> show that only 65% of children recommended for support receive assistance within six months. In some municipalities, the rate is as low as 30%, while in others it reaches 90%.<sup>37</sup> A registry-based analysis showed that 36% of 1,550 children involved in cases of parental violence received no municipal intervention before or within a year after charges were filed<sup>38</sup>.

- What measures are being taken to ensure that all children exposed to violence or sexual abuse receive timely and effective support, regardless of their municipality of residence?
- How does the government intend to strengthen the evidence base on effective interventions and ensure that families can access and receive such support?

### **Access to justice and child-friendly procedures in cases of violence and abuse**

There is currently no fast-track mechanism for cases involving sexual abuse of children, which may result in prolonged proceedings that exacerbate trauma and hinder recovery.

The National Council's 2025 children- and youth panel on violence against children recommends that all children involved in violence or abuse cases should be video-interviewed in a

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<sup>36</sup> The Danish Children's Houses provide a coordinated, cross-sectoral and multidisciplinary response in cases where there is knowledge of or suspicion of abuse against children aged 0–17 years. It is mandatory for municipalities to use the Children's House to which they are affiliated in cases where there is knowledge or suspicion of abuse against children.

<sup>37</sup> Social- og Boligstyrelsen (2025): *Hvorfor lykkes vi ikke bedre med at bekæmpe vold og seksuelle overgreb mod børn?*

<sup>38</sup> Børns Vilkår (2023): *Vold i hjemmet. Får vi øje på det, og får børnene den rette hjælp? En registeranalyse af underretninger og kommunens indsatser for børn under 18 år udsat for vold i hjemmet.*

Children's House (Børnehus)<sup>39</sup>. Presently, only those under 15 years are routinely interviewed in such settings<sup>40</sup>, except unless exceptional circumstances apply. Safe and child-sensitive environments are essential to minimising re-traumatization and enabling children to speak about their experiences.

- How will the government ensure that children subjected to physical, psychological or sexual violence are taken seriously by authorities and protected during criminal proceedings, including through specialized interviews, support, and child-friendly procedures particularly in cases involving children from the age of 15 years old?
- What measures are planned to ensure that all children under 18 involved in violence or abuse cases are video-interviewed in child-friendly Children's Houses?

### **Protection of children with disabilities in alternative care against violence and abuse**

Children with disabilities in care face a significantly higher risk of physical, psychological, and sexual abuse than their peers. Research shows that the combination of disability and vulnerable living conditions substantially increases this risk<sup>41</sup>. A recent study found that 15 to 17-year-old girls in residential care are extremely vulnerable: 36% had experienced physical assault, 50% rape or attempted rape, 60% digital abuse, 86% self-harm, and 61% had attempted suicide<sup>42</sup>.

- What measures will the government take to protect children with disabilities in alternative care from abuse and ensure their safety?

### **Sanctions-based behaviour management in schools**

In Denmark there is currently an ongoing public debate about whether disruptive and aggressive behaviour among students in schools is becoming a growing problem. This has led to repeated political calls to tighten school disciplinary regulations. In 2024, legislation was amended to expand the grounds for dismissing students and to simplify school transfers when behaviour is deemed incompatible with the schools rules of conduct and values. New

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<sup>39</sup> Børnerådet (2025): *Vold mod børn - Børn og unges gode råd og kvalificeringer til Social- og Boligministeriets arbejdsgruppe om vold mod børn*.

<sup>40</sup> LBK nr. 1160 af 5. november 2024 § 745e.

<sup>41</sup> Christoffersen, Mogens N. (2022): *Sexual crime against schoolchildren with disabilities: a nationwide prospective birth cohort study*, VIVE.

<sup>42</sup> Lausten, Mette et. al. (2025): *Trivsel blandt børn og unge i udsatte positioner 2025*. VIVE.

regulations also allow the creation of special emergency schools, where students can be temporarily placed outside the mainstream setting<sup>43</sup>.

Several child rights organizations have criticized this growing tendency to exclude students, warning that such measures risk undermining children's right to inclusion and support<sup>44</sup>.

In addition to recent changes, the government now proposes easing rules on when teachers are allowed to use physical force. Currently, such force is allowed only when a child poses a risk to themselves, others, or school property. The proposal would allow its use in cases such as classroom disruption.

From a child rights perspective, this is concerning, as disruptive behaviour often signals unmet needs within the school environment. Moreover, key legal safeguards are lacking: there is no requirement to monitor or document the use of force, nor are formal complaint mechanisms available to students.

- How will the government ensure that physical force is not used beyond what is strictly necessary?
- What safeguards will be introduced to uphold students' legal rights if the use of force is expanded?

### **Bullying in school**

In recent years, there has been a rise in the number of students in Denmark who experience bullying in schools. In 2025, 13,2% of students reported being bullied. In 2021, the number was 8,6%<sup>45</sup>.

Despite this development, the government decided in 2025 to disband the Danish Centre for Learning Environment, which had developed teaching materials, provided training, monitored school climates, and acted as the national complaints body for bullying. The complaints body has been temporarily moved to an agency under the Ministry of Children and Education but is subject to a sunset clause and set to close in 2027 unless extended.

- Which new initiatives will the government implement to address the rise in bullying?
- How will schools be supported in preventing and dealing with bullying and challenges related to the learning environment?

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<sup>43</sup> Bekendtgørelse nr. 1551 af 26. december 2024 om fremme af god orden i folkeskolen.

<sup>44</sup> Børnerådet et. al. (2024): *Åbent brev til Børne- og Undervisningsministeren*.

<sup>45</sup> Børne- og undervisningsministeriet (2025): *National trivselsmåling*.

→ Will the bullying complaints body remain after 2027? If not, how will students' rights be upheld?

## **Family environment and alternative care (arts. 5, 9-11, 18 (1)-(2), 20-21, 25 and 27 (4))**

### **Children in the family law system**

Every year, more than 12,000 cases are processed in which separated parents are in conflict regarding the cooperation about their children. The 2019 reform of the family law system aimed to strengthen children's rights through increased participation, improved protection, and more holistic case management<sup>46</sup>.

However, a 2025 national evaluation by the Danish Centre for Social Science Research (VIVE) documents that the family law system continues to face serious structural and rights-related challenges. Approximately 70% of cases involve families facing complex problems, such as violence, crime, substance abuse, or mental illness<sup>47</sup>. Many of the affected children are simultaneously in contact with the municipal child welfare system, placing high demands on co-ordination and inter-agency collaboration. In practice, however, both children and parents often experience a fragmented and uncoordinated case process, lacking both overview and coherence across authorities<sup>48</sup>.

Despite some positive developments – including an increase in direct child participation and greater attention to risk factors – the evaluation shows that child interviews are often conducted without sufficient continuity or follow-up. Only a few children have the same contact person throughout the entire process, and expert child assessments (børnesagkyndige undersøgelser) involving children are rarely conducted due to insufficient psychological capacity<sup>49</sup>.

The evaluation also found that 30% of cases return to the system within one year, regardless of whether the case was closed by the Danish Agency of Family Law or the family courts. This suggests that decisions often fail to address the underlying social and psychological needs, resulting in prolonged and unresolved proceedings<sup>50</sup>.

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<sup>46</sup> Social- og Boligministeriet (2018): *Aftale om ét samlet familieretligt system*.

<sup>47</sup> Ottosen, M. H og Dahl, Karen Margrethe (2024): *De mest komplekse forældreansvarssager*, VIVE.

<sup>48</sup> Ottosen, M. H. et. al. (2025): *Evaluering af den familieretlige reform fra 2019*, VIVE.

<sup>49</sup> Ottosen, M. H. et. al. (2025): *Evaluering af den familieretlige reform fra 2019*, VIVE.

<sup>50</sup> Ottosen, M. H. et. al. (2025): *Evaluering af den familieretlige reform fra 2019*, VIVE.

- What steps will the government take to prevent children involved in both municipal and family law systems from facing duplicate case handling and legal uncertainty?
- What measures will ensure consistent and meaningful child participation, including access to expert assessments, cross-sectoral collaboration, and follow-up?
- How will the government address the high recurrence of cases and the failure to deliver lasting outcomes for children?
- When will the government review whether the current division of responsibilities between municipalities, the Family Law Agency, and the courts remains appropriate, in light of the evaluation's findings?

### Introduction of the concept of parental alienation in legislation

As of 1 January 2025, the concept of parental alienation<sup>51</sup> was introduced into the Danish Parental Responsibility Act, despite the absence of a universally accepted definition<sup>52</sup>. Both the UN Special Rapporteur on violence against women and girls<sup>53</sup> and the European Parliament<sup>54</sup> have criticized its use in family law.

The amendment aims to prevent contact breakdowns and support the child's opportunity to maintain relationship with both parents after separation<sup>55</sup>. However, the concept raises concerns about legal certainty and professional child-centred standards, especially since the legislation was adopted without prior mapping of its prevalence<sup>56</sup>.

Research shows that it is not uncommon for parents to express negative views about each other to the child post-separation, such attitudes rarely lead to the child rejecting contact

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<sup>51</sup> Folketinget (2024): *L 66 – Forslag til lov om ændring af forældreansvarsloven og lov om Familieretshuset (Styrkelse af barnets perspektiv i familieretlige sager m.v.)*. Vedtaget lovforslag.

<sup>52</sup> Darling Rasmussen, Pernille (2024): *Forældreafremmedgørelse*, Kognition & Pædagogik, Årg. 34, nr. 132.

<sup>53</sup> FN's special rapporteur (2023): *Custody, violence against women and violence against children Report of the Special Rapporteur on violence against women and girls its causes and consequences*, A/HRC/53/36.

<sup>54</sup> Europa parlamentet (2021): *Betænkning om konsekvenserne for kvinder og børn af partnervold og forældremyndighedsrettigheder*, A9-0254/2021.

<sup>55</sup> Socialudvalget (2024): *Betænkning over forslag til lov om ændring af forældreansvarsloven og lov om Familieretshuset*.

<sup>56</sup> Børnerådet (2024): *Indførsel af forældreafremmedgørelse som begreb i lovgivning risikerer at underminere barnets perspektiv*

with one parent<sup>57</sup>. Nonetheless, the legislation lacks systematic evaluation of how the concept is applied in practice and whether it supports sound, child-focused decisions. The term is closely linked to the notion of “cooperation harassment” (introduced in the Danish legislation at 2015<sup>58</sup>), yet the relationship between the two remains unclear, creating a risk of inconsistent application.

- How will the government ensure that the introduction of the concept of parental alienation into legislation does not result in children’s own statements and experiences with a parent being dismissed as manipulation or “negative influence”, without a concrete assessment of the child’s perspective, protection needs, and best interests?
- When will the government initiate a systematic and independent evaluation of how the concept of parental alienation is applied within the family law system, including its impact on decisions concerning visitation, residence, and parental authority?
- What measures will the government take to ensure a clear and consistent delineation of the concept of parental alienation in relation to related terms such as cooperation harassment – both within the Danish Agency of Family Law and the family courts – in order to avoid legal and professional ambiguity in case handling?

### **Well-being of children receiving alternative care and support measures**

The 2025 Well-being Survey highlights ongoing serious challenges among children placed in residential care or receiving supportive interventions. These children report low well-being combined with high levels of vulnerability and risk behaviour, raising concerns about the timing, scope, and quality of current efforts. The survey covers areas such as education, mental and social well-being, family conditions, and involvement in casework, and is conducted biannually to monitor progress under the Children First reform.

The 2025 results largely confirm findings from 2023, reinforcing the need for greater focus on children covered by the Child’s Act—particularly those in residential care and those receiving support. Many receive help only in their teens, prompting reflection on whether interventions come early enough and are sufficiently effective<sup>59</sup>.

- Which specific measures will the government make to safeguard the well-being of children in residential care or receiving support?

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<sup>57</sup> Johnston, J. R. (2005): *Children of Divorce Who Reject a Parent and Refuse Visitation*, Recent Research and Social Policy Implications for the Alienated Child. In *Family Law Quarterly*, 38(4).

<sup>58</sup> Lov nr. 270 af 25. marts 2015, [Lov ændring af forældreansvarsloven og retsplejeloven](#).

<sup>59</sup> Lausten, Mette et. al. (2025): *Trivsel blandt børn og unge i udsatte positioner 2025*. VIVE.



### **Foster families and their conditions**

Between 2017 and 2023, the number of foster families declined by 17%<sup>60</sup>. The demand now exceeds supply, leaving some children with special needs unable to access family-based care.

This shortage is partly attributed to the conditions under which foster families operate, which are set by municipalities. A working group and related political negotiations were suspended but are expected to resume. The forthcoming political agreement must address both the shortage of foster families and how to improve their conditions to attract and retain carers capable of meeting the children's specific needs.

- How will the government attract more foster families and improve the conditions for them and thereby ensuring quality for the children?

### **Placement stability in alternative care**

Placement breakdowns remain common for many children. Research finds that one in five children in alternative care has experienced three or more placements<sup>61</sup>, and this trend has not improved over time. This persists despite reforms in both 2006, 2011 and 2021 aimed at promoting stability. Trials show that thorough matching can reduce breakdown<sup>62</sup>.

- How will the government ensure that all municipalities apply a systematic and evidence-based approach to matching prior to placement?
- How will the children's needs and wishes be meaningfully considered and given due and substantial weight in placement decisions?

### **Cutbacks to the social care inspection**

From 1<sup>st</sup> of January 2026, the Social Care Inspection (*Socialtilsynet*) will undergo significant cuts, with approximately 40% of inspection staff being laid off. Inspection frequency will drop—from annual to biennial in foster care and every three years in institutions—and will shift to a risk-based model<sup>63</sup>.

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<sup>60</sup> Socialpædagogerne (2023): *Stort fald i antallet af plejefamilier*.

<sup>61</sup> Social- og Boligministeriet (2023): *Stor trivselsundersøgelse: Hvert fjerde anbragte barn ville gerne have været anbragt tidligere*.

<sup>62</sup> Socialpædagogerne (2025): *Ny matchmodel giver færre sammenbrud: "Vi skal passe på både børnene og vores plejefamilier"*.

<sup>63</sup> Børnerådet (2025): *Hvis socialtilsynet forringes sætter vi samfundets allermest sårbare børn og unge i en endnu mere sårbar position*.



Additionally, the audit function at the Danish Authority of Social Services and Housing was discontinued in 2024. It was intended to ensure cross-cutting coordination and consistent practices among across the 5 regional inspections.

- How will the government ensure that reduced inspections do not increase the risk of maltreatment or rights violations for children in foster care and institutions?

### **Use of force towards children in institutions**

The use of force in institutional care settings remains a concern in Denmark, particularly in light of recent cutbacks to the Social Care Inspection and the closing of its audit functions. These reductions have weakened registration and oversight mechanisms, potentially compromising children's protection from unnecessary or unlawful force.

A 2025 study by the National Council for Children revealed major inconsistencies in how the five regional inspections register such incidents. The outdated registration system contributes to inaccuracies and a lack of transparency.

The study also emphasises that prevention, child involvement, accessible complaints mechanisms, and systematic monitoring are essential to safeguarding children's rights in these settings<sup>64</sup>.

- How will the government ensure that the use of force is prevented and applied only when strictly necessary, including through staff training, child participation, and institutional safeguards?
- What systems are in place to ensure that all incidents involving force are properly recorded, monitored, and subject to accessible complaints procedures that children can understand and use?

### **Social versus judicial placements in secure institutions**

Secure institutions accommodate both children placed for social reasons and those placed by judicial decision. This dual system poses a risk that children under social placements may be subjected to restrictions intended only for judicial placements, raising concerns about disproportionate limitations and legal safeguards.

- How will the government ensure that children in social placements are not subject to the same restrictions as those under judicial placement, in accordance with legal standards?

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<sup>64</sup> Børnerådet (2025): *"Det sætter spor resten af livet" 17 børn og unge fortæller om magtanvendelser.*

### **Children with incarcerated parents**

Denmark has one of the highest pre-trial detention rates in Europe, exceeding that of comparable countries such as Sweden, Norway, and Germany<sup>65</sup>. Recently adopted stricter rules further limit contact between detainees and their families<sup>66</sup>. More than half of all persons held in pre-trial detention are subject to such restrictions, and they are only entitled to one 30-minute visit per week or one 60-minute visit every two weeks, under police supervision<sup>67</sup>.

- How does the government ensure that children maintain regular, personal, direct and meaningful contact with a parent held in pre-trial detention?

## **Children with disabilities (art. 23)**

### **Adopting a comprehensive national action plan**

In its 2017 Concluding Observations (paras. 28–29), the Committee noted that Denmark had not fully implemented a human rights-based approach to children with disabilities. It recommended a comprehensive national action plan addressing key issues such as violence, coercion, and exclusion from mainstream education. Denmark has yet to adopt such a plan. Moreover, the Child's Act (*Barnets Lov*) introduced changes only regarding participation for children with disabilities, leaving broader rights unaddressed.

- When will the government commit to an action plan for children with disabilities?

### **Sufficient support to families with a child with disabilities**

A strong family environment is essential for all children, including those with disabilities. Municipalities are responsible for providing support to both the child and their family. Without sufficient assistance, families may become overwhelmed, increasing the risk of out-of-home placements. The State should incentivise municipalities to provide early, coordinated support that enables children to remain at home.

- How will the government ensure the right of children with disabilities to live at home, including by guaranteeing that services and support follow the child?

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<sup>65</sup> Advokatsamfundet (2023): *Danmark varetægtsfængsler dobbelt så meget som nære lande*.

<sup>66</sup> Justitsministeriet (2022): *Bredt flertal af Folketinget vedtager skærpede regler for at undgå fangeflugter*.

<sup>67</sup> SAVN (2024): *Når forældre varetægtsfængsles, straffes også deres børn*.

## Basic health and welfare (arts. 6, 18 (3), 24, 26, 27 (1)-(3) and 33)

### Children's right to daycare that supports their well-being and development

For several years, Denmark has been the country in Europe where children start institutional care at the earliest age<sup>68</sup>. Children typically spend seven to eight hours per day in early childhood institutions, meaning they spend a large part of their waking hours in these settings<sup>69</sup>. This places high demands on the quality of care, as well as on the number of qualified pedagogical staff available to ensure secure attachments, strong peer relationships, and the overall well-being and development of the children

In 2024, a new law introducing minimum staff-child ratios came into force. The purpose was to ensure a minimum number of qualified staff relative to the number of children, and this has generally had the intended effect<sup>70</sup>. However, there are still major challenges related to the quality of the pedagogical learning environments in daycare settings.

Two recent studies document these quality issues. They show that 28% of daycare settings for children aged three to five provide a pedagogical learning environment of insufficient quality<sup>71</sup>. Similarly, 38% of daycare settings for children aged zero to two, as well as 46% of home-based day care settings for the same age group, were found to provide insufficient quality<sup>72</sup>.

- What will the government do to improve the quality of daycare settings so that the pedagogical learning environment better supports children's well-being and development?

### Mental health and the right to treatment

Approximately 15% of all children are diagnosed with a psychiatric disorder, and 16% experience mental health problems or illness before the age of 10<sup>73</sup>. Various studies point to causes including societal pressure, the pace of everyday life, conditions in daycare and

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<sup>68</sup> Eurostat (2025): *Formal child care by duration and age group*.

<sup>69</sup> Børnerådet (2019): *Voksne skal være nærværende – ikke kun i nærheden*.

<sup>70</sup> Danmarks Statistik (2023): *Omregnede normeringer*.

<sup>71</sup> EVA (2025): *Kvalitet i daginstitutioner for 3-5-årige*.

<sup>72</sup> EVA (2023): *Kvalitet i daginstitutioner og dagpleje for 0-2-årige*.

<sup>73</sup> Psykiatrifonden (2025): *Flere børn og unge får en psykisk lidelse*.

schools<sup>74</sup>, social media, and digital tools. A comprehensive study is needed to better understand these factors and guide targeted prevention and treatment.

Children wait too long for help when they experience mental issues<sup>75</sup>. Although a new “easy accessible initiative” (*Lettilgængeligt tilbud*) is being rolled out in schools,<sup>76</sup> it remains purely preventive and does not yet include daycare settings.

The legislative guarantee of timely assessment and treatment has not been upheld, and the legislation change is in progress. Urgent access to care is absolutely essential to prevent worsening of symptoms.

- How will the government ensure effective prevention of further negative development in mental issues amongst children?
- How will the government guarantee that children with severe mental health needs receive timely assessment and treatment without harmful delays?

### **Prevention of suicide among children**

Researchers identify 19 risk factors associated with suicide attempts among children and young people<sup>77</sup>. These factors are present in two-thirds of all first-time suicide attempts among individuals aged 15 to 29, helping to define a high-risk group. This represents an important step toward understanding some of the underlying causes and, consequently, developing new prevention strategies. Many of the risk factors are closely tied to mental health.

The study shows that 4.5% of a birth cohort attempt suicide before the age of 30. Out of the approximately 300,000 children born in Denmark between 1980 and 1985, who were followed from age 15 to 29, 13,358 attempted to take their own lives.

- How will the government strengthen the prevention of suicides among children and young people?

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<sup>74</sup> Finansministeriet (2025): *Regeringen lancerer statsligt arbejdsprogram med administrationsbesparelser*.

<sup>75</sup> Hansen, Anna Sofie et. al (2021): *Help-seeking pathways prior to referral to outpatient child and adolescent mental health services*.

<sup>76</sup> Sundhedsstyrelsen (2023): *Kommunalt behandlingstilbud til børn og unge i psykisk mistrivsel*.

<sup>77</sup> Christoffersen, Mogens N. og Khan, Lorraine (2024): *"Can life events predict first-time suicide attempts? A nationwide longitudinal study"*.

## Standard of living

Despite Denmark's strong welfare model, approximately 49,500 children are currently growing up in poverty<sup>78</sup>. Many lack access to essential needs such as nutritious food, stable housing, leisure activities, and medicine—raising serious concerns about their well-being and rights.

In 2023, a majority in the Danish Parliament adopted a reform of the social assistance system, set to take effect July 1<sup>st</sup> 2025. The reform introduces improvements, such as a leisure allowance for all children in families receiving social assistance and access to free prescription medication. However, the measures fall short of ensuring that all children enjoy their right to an adequate standard of living.

According to the Ministry of Employment, the reform will lift an estimated 2,000 children out of poverty in the short term and 4,000 in the long term, leaving the large majority of children in poverty unaffected. Some families, particularly those receiving the minimum rate (many of whom have non-Western backgrounds), may continue to receive very low benefits or even see reductions. This raises concerns about indirect discrimination and unequal access to rights.

Denmark has not introduced an official poverty line or adopted concrete benchmarks or strategies to eradicate child poverty nationwide, making it difficult to monitor progress or hold duty-bearers accountable.

- What steps will the government take to ensure *all* children growing up in Denmark enjoy their right to a standard of living adequate for their development, regardless of their parents' employment status or background?
- Will Denmark establish an official poverty line and adopt a national strategy to combat child poverty, in line with its obligations under the Convention?
- With reference to Article 27 of the Convention, please provide information on the measures taken to ensure that all children — in particular those from non-Western backgrounds who are overrepresented among children living in poverty —, enjoy an adequate standard of living and are not left behind in national strategies to combat child poverty?

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<sup>78</sup> Caspersen, Sune (2024): *Flere børn vokser op i fattigdom*.

## Children's right and the environment (arts. 2, 3, 6, 12, 13, 15, 17, 19, 24 and 26–31)

### Children's right to a clean environment

Although Denmark presents itself internationally as a green frontrunner, it still faces major challenges in safeguarding children's right to a clean and healthy environment.

Air pollution in urban areas disproportionately affects children<sup>79</sup> and Danish waters continue to suffer from widespread hypoxia and inadequate regulation of hazardous chemicals<sup>80</sup>.

Many children express deep concern about climate change and feel powerless, as they do not see adults taking sufficient responsibility<sup>81</sup>. Despite this, they remain excluded from climate policy decision-making in Denmark. If the state fails to avert foreseeable environment-related threats and does not actively work to mitigate climate change, it is the children who will bear the long-term consequences.

- How will the government reduce environmental pollution, including air and marine pollution, in order to protect children's right to a clean and healthy environment?
- What actions will Denmark take to fulfill its obligations under the Paris Agreement and ensure a sustainable planet and sustainable future for the generations to come?

## Education, leisure and cultural activities (arts. 28-31)

### Children's right to high quality education and adequate support

A concerning and growing trend towards segregation within Denmark's public school system has led to increased funding for special education placements at the expense of mainstream education. As a result, mainstream schools face reduced financial capacity to support diverse student needs within the classroom. This dynamic contributes to a cycle in which un-

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<sup>79</sup> Danmarks Radio (2018): *Luftforurening rammer børn hårdere end voksne*.

<sup>80</sup> Tænketanken HAV (2025): *Kemisk forurening af det danske havmiljø* og National Center for Miljø og Energi (2024): *Iltsvind i de danske farvande*.

<sup>81</sup> Hickman, Caroline et. Al. (2021): *Climate anxiety in children and young people and their beliefs about government responses to climate change - a global survey*.

der-resourced mainstream education pushes more students into special education. Currently, 25% of the total public-school budget serves just 6.5% of students in special education placements<sup>82</sup>.

A 2023 study found that parents and students perceive the support process as slow and burdensome. In some municipalities, a psychiatric diagnosis is seen as a prerequisite for receiving help. In 2024, 23.4% of students in 3<sup>rd</sup>, 6<sup>th</sup> and 9<sup>th</sup> grades were assessed as having support needs within mainstream settings. These range e.g. from structuring and organizing tasks, academic participation, reading and writing, maintaining focus during lessons, and becoming active participants in group work<sup>83</sup>.

Many of these students do not receive adequate support. An additional concern is the inability to appeal support decisions if assistance granted falls below nine hours per week<sup>84</sup>. The nine-hour threshold is arbitrary, and the rights of the individual student largely depend on how much support the school chooses to provide.

- How will the government ensure access to high-quality education that meets all children's needs?
- How will the government ensure that all children with learning support-needs receive timely and sufficient assistance?
- How will the government ensure that all children and children's communities receive the necessary support and financial resources to secure equal educational opportunities for all children?

### **School absenteeism and children's rights to wellbeing and further education**

In recent years, Denmark has seen a sharp rise in school absenteeism. In the 2023/2024 school year, over 20% of students had an absence rate exceeding 10%. In 2020/2021 this applied to 10%<sup>85</sup>.

This trend raises serious concerns about children's well-being and their right to education. High absence levels may indicate underlying issues, such as poor mental health or lack of support. Children who are absent still retain the right to an education that enables them to

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<sup>82</sup> Kommunernes Landsforening (2023): *Teoretisk, praktisk, god*.

<sup>83</sup> Tegtmejer, Thyge et. al. (2024): *Særlige behov i skolen. En undersøgelse af forståelse, opdeling, organisering omkring og imødekommelse af særlige behov i skolen*, VIVE.

<sup>84</sup> Folkeskoleloven, § 3, stk. 2. Lovbekendtgørelse nr. 1396 af 1. september 2023.

<sup>85</sup> Børne- og Undervisningsministeriet (2025): *Elevfravær, uddannelsesstatistik*.

pursue further studies, including access to home-teaching during extended absences.

The challenge is acknowledged at the political level, and in June 2025, a national action plan to address school absence was announced. However, the action plan is subject to the condition that it must not require additional funding, raising questions about its impact<sup>86</sup>.

- What will the government do to reduce high levels of school absenteeism?
- How will the government ensure that all students receive the education they are entitled to during prolonged periods of absence?

### **Human rights education in the new curriculum**

With the replacement of the current Common Goals (*Fælles Mål*) by a simplified and cleaner curricula for school subjects, it is under consideration whether and how human rights education will be integrated.

A 2023 study shows a concerning decline: only 45% of students report being taught to respect others' rights at school, down from 70% in 2019<sup>87</sup>. This stands in contrast to the Danish Folkeskole Act, which states that schools must prepare students for participation, co-responsibility, rights, and duties in a society based on freedom and democracy.

- Will the government ensure that education on children's rights is incorporated into the new curricula for school subjects?

### **Accessible leisure opportunities that uphold Children's Rights**

A good leisure life for children is marked by social connections, freedom to pursue personal interests, and participation in activities and sports<sup>88</sup>. While many are engaged, participation tends to decline with age — a 2025 study shows that 18% of 7th graders are not involved in leisure activities and that children who do not participate in leisure activities are twice as likely to experience loneliness compared to those who do<sup>89</sup>.

Barriers can include financial constraints, lack of access or awareness, and geographical challenges. Currently, 85 out of 98 Danish municipalities offer a "leisure pass" to support children who are excluded from organized activities due to social or economic reasons.

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<sup>86</sup> Folketinget (2025): *B 128 Folketingsbeslutning om en national handlingsplan for børn og unge med skolevægring*. Vedtaget.

<sup>87</sup> Unicef (2023): *Børn har begrænset kendskab til deres rettigheder*.

<sup>88</sup> Børnerådet (2019): *Det gode fritidsliv er venner, tid og frihed*.

<sup>89</sup> Børns Vilkår (2025): *Fællesskaber i fritiden kan styrke trivslen – men mange børn går ikke til fritidsaktiviteter*.



To ensure positive and inclusive experiences, leisure environments must be safe and guided by adults with the skills to promote well-being and belonging. However, harmful practices—such as psychological pressure, unhealthy ideals, and neglect of children’s welfare—have been reported, especially in elite sports and cultural settings, where adult responsibility has been insufficient

<sup>90</sup>.

- How will the government ensure meaningful participation beyond formal access — addressing social and cultural barriers?
- Will a leisure pass become mandatory in all municipalities, and what steps will be taken to enhance inclusive participation?
- How is the government supporting municipal outreach to families about leisure pass opportunities?
- How will sufficient child-focused competencies among volunteers and adults in associations and clubs be ensured?
- What measures will guarantee that all leisure environments, including elite settings and media, uphold children's rights to mental and physical well-being?

## **Special protection measures (arts. 22, 30, 32-33, 35-36, 37 (b)-(d) and 38-40)**

### **Unaccompanied minors with temporary residence**

The rule of giving only temporary residence to unaccompanied minors is not in the child’s best interest, both objectively and as documented in a 2024 report by Save The Children Denmark and VIA University College<sup>91</sup>. The study shows that children who have been granted temporary residence struggle with distress, discouragement, and loneliness. The short-termed permits and the frequent reassessments create uncertainty, long waiting times, and limit the rights of children - negatively affecting their development, education and well-being.

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<sup>90</sup> Advokatsamfundet (2022): *Beskyttelse af børn i sport* og Børnerådet (2016): *Der skal være én, der kun passer på børnene - børn fortæller om at arbejde i underholdningsbranchen*.

<sup>91</sup> Red barnet (2024): *Børn og unge på midlertidigt ophold i Danmark kæmper med stor mistrivsel*.

- How will the government avoid the negative effects of temporary residence permits on unaccompanied children living in Denmark?

### **Deportation centres for children and families with rejected asylum claims**

Families whose asylum claims are rejected are often moved quickly to deportation centres, where they may remain for years due to an inability or unwillingness to return to their country of origin. Extended stays in such centres have a documented negative impact on children's mental health and well-being.

- What will the government do to avoid children staying in deportation centres when it severely affects their mental health?
- How will the government ensure that these children are given the same rights as other children living in Denmark?

### **Family reunification**

Minors aged 15 and above face a number of conditions to overcome if they are to be granted family reunification as opposed to children under 15. That includes not having relatives in the home country even if the child has not met the relative.

- Will the government revise the legislation to ensure equal access to family reunification for all children, regardless of age?

### **Juvenile justice systems**

Established in 2019, the Youth Crime Board (UKN) was intended to prevent and reduce crime among children aged 10-17.

However, children aged 10-14 can be referred based on suspicion alone and are not afforded the same legal protections as in regular criminal proceedings. Appeal rights are highly limited—only applicable to placement decisions, and even then, appeals do not suspend enforcement. "Improvement programmes" (*forbedringsforløb*) can last up to four years.

Many children and families feel the system priorities control, surveillance and punishment over support. There is often insufficient focus on children's individual needs, contrary to a child-friendly, rights-based approach.

International research shows that exposing children to legal or court-like procedures at a young age increases the risk of reoffending and reinforces negative self-perceptions. In other words, they risk being labelled as "troublemakers" and pushed away from positive communities.

A 2025 evaluation by the Danish Centre for Social Science Research (VIVE) confirmed these concerns<sup>92</sup>, noting that children often experience UKN measures as punitive.

- How will the government ensure that responses to children at risk of criminal behaviour are proportionate and include flexible, supportive interventions tailored to their needs?
- How will the authorities accommodate children with complex needs, including through individual assessments that allow for urgent adjustment in placement type, reduced school attendance requirements, or suspension of supervision measures?
- What measures are taken to ensure that the Youth Crime Board (Ungdomskriminalitetsnævnet) does not function or appear as a court-like body, given the risk of increased reoffending associated with early exposure to formal justice systems?

### **Children who work**

Denmark has the highest rate of youth employment in the Nordic region. In 2021, 36% of 15-year-olds in Denmark had a job, compared to 12% in Norway and 4% in Sweden<sup>93</sup>.

In recent years the view on children and work has shifted. While previous policies focused increasingly on protecting children from work that could harm their safety and health, a broad majority in the Danish Parliament has now passed new legislation aimed at making it even easier to employ children.

This includes lowering the minimum age for certain job functions – for example, children as young as 13 years old are now allowed to work at the checkout in supermarkets. Legislation about working alone has also been relaxed<sup>94</sup>.

This happens despite repeated studies showing that existing labour regulations for young workers are often not followed. In a 2024 survey, 96% of working children said they had experienced violations of their rights at work. In addition, 91.2% of working children and youth are not members of a union and therefore lack access to professional and legal support when their rights are not respected<sup>95</sup>.

On top of this, Denmark has very limited research on the employment of 13–15-year-olds. This makes it difficult to implement the necessary protections to ensure children's health and safety at work.

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<sup>92</sup> Larsen, Britt Ø. et. al. (2025): *Børn og unges møde med Ungdomskriminalitetsnævn og Ungekriminalforsorg*, VIVE.

<sup>93</sup> Danmarks Statistik (2023): *Over en tredjedel af unge har et fritidsjob*.

<sup>94</sup> Beskæftigelsesministeriet (2025): *Fra 1. januar bliver det lettere for unge at få et fritidsjob*.

<sup>95</sup> Jobpatruljen (2024): *Jobpatruljens evalueringsrapport 2024*.

- How will the government ensure that child labour regulations are effectively enforced, particularly in light of the expanded access to youth employment?
- What steps will the government take to ensure that children and young people have access to professional and legal support when their rights in the workplace are not respected?
- What will the government do to strengthen knowledge about the health and safety risks of working at the age of 13 to 15?

## List of issues prior to reporting submissions 2025

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