

CPT/Inf (2025) 14

Report

**to the Danish Government
on the visit to Greenland
carried out by the European Committee
for the Prevention of Torture and Inhuman
or Degrading Treatment or Punishment (CPT)**

from 14 to 16 January 2025

Reports on CPT visits to Denmark are published under an automatic publication procedure.

Strasbourg, 14 May 2025

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I. INTRODUCTION

A. The visit, the report and follow-up

1. In pursuance of Article 7 of the European Convention for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (hereinafter referred to as “the Convention”), a delegation of the CPT carried out a visit to Greenland¹ from 14 to 16 January 2025. The visit was one which appeared to the Committee “to be required in the circumstances” (see Article 7, paragraph 1, of the Convention) and its purpose was to examine the conditions of detention, regime and treatment of persons accommodated in the closed unit (Unit A) of the new prison in Nuuk (*Ny Anstalt*). It was the CPT’s 9th visit to Denmark.²

2. The visit was carried out by the following members of the CPT:

- Vânia Costa Ramos, Head of Delegation
- Marie Kmecová
- Elsa Bára Traustadóttir.

They were supported by Borys Wódz, Head of Division at the CPT’s Secretariat, and assisted by:

- Pétur Hauksson, psychiatrist, former Head of the Psychiatric Department at Reykjalundur Rehabilitation Centre, Iceland (expert)
- Heidi Flegal (interpreter)
- Tida Sigurdsdatter Ravn (interpreter).

3. The report on the visit was adopted by the CPT at its 116th meeting, held from 10 to 14 March 2025, and transmitted to the Danish authorities on 28 March 2025. The various recommendations, comments and requests for information made by the Committee are set out in bold type in the present report.

¹ Greenland (*Kalaallit Nunaat*) is a self-governing entity within the Kingdom of Denmark.

² The CPT has previously carried out seven periodic visits to Denmark, in 1990, 1996, 2002, 2008, 2014, 2019 and 2024. Further, the Committee has carried out an ad hoc visit to Greenland (in 2012). All the CPT’s reports and responses of the Danish authorities to date are in public domain (<https://www.coe.int/en/web/cpt/denmark>) upon the authorities’ request and pursuant to the automatic publication procedure introduced by the Danish authorities in 2018. According to this procedure, all documents related to CPT visits shall be published automatically, unless the Danish authorities submit within two weeks a request to postpone (for a period of up to six months) the publication of the document concerned.

The CPT requests the Danish authorities to provide within three months a response containing a full account of action taken by them to implement the Committee's recommendations and replies to the comments and requests for information formulated in this report.

B. Consultations held by the delegation and co-operation encountered

4. While in Nuuk, the CPT delegation held consultations with Christian Høygaard, Director, and other officials of the Prison and Probation Administration in Greenland. After the visit, on 17 January 2025, the delegation presented its preliminary observations to senior officials from the Danish Prisons and Probation Administration in Copenhagen, including Mette Kjølby, Acting Director of the Centre for Sentence Enforcement.

A full list of the officials whom the CPT's delegation met in Nuuk and Copenhagen is set out in the Appendix to this report.

5. The delegation received excellent co-operation during its visit to *Ny Anstalt* (hereafter referred to as Nuuk Prison). In particular, the delegation had rapid access to all premises it wished to visit, was able to meet in private with persons with whom it wanted to speak and was provided with access to all the documents it required.

The Committee wishes to express its appreciation of the efficient assistance provided to it before and during the visit by the Liaison Officer appointed by the Danish authorities, Hélène Fester from the Ministry of Foreign Affairs, as well as by the contact person appointed for the duration of this particular visit by the Prison and Probation Administration in Greenland, Sofie Anna Krogner-Fleming.

II. FACTS FOUND DURING THE VISIT AND ACTION PROPOSED

1. Preliminary remarks

6. As already mentioned in paragraph 1 above, the CPT's delegation visited the new Nuuk Prison. Brought into service in 2019, it has replaced the old prison in Nuuk (visited by the CPT in 2012³) and is the only penitentiary establishment in Greenland which has a closed unit.⁴ Previously, persons from Greenland serving a sentence in closed conditions had to do so in Denmark, mainly in Herstedvester Institution (visited by the CPT on several occasions).⁵

The opening of the new Nuuk Prison has enabled Greenlandic closed-regime prisoners, most of whom have been serving indeterminate prison sentences (*forvaring*) for serious offences, to be accommodated closer to their homes and in a familiar linguistic and cultural environment.⁶ It should be stressed from the outset that the Committee welcomes this positive development, which is in line with the CPT's previous recommendations.⁷

7. At the time of the 2025 ad hoc visit, Nuuk Prison had the capacity of 76, including 40 places in the closed Unit A (on which the delegation focussed its attention) and 36 in open Units B and C, and was accommodating 83 inmates including 45 in Unit A and 38 (including 8 women) in Units B and C. Amongst those accommodated at Unit A, there were 23 adult men serving indeterminate sentences, three with fixed-term sentences (up to 10 years)⁸ and 19 adult remand prisoners including four women.⁹

³ See paragraphs 22 to 44 of document CPT/Inf (2013) 3. The old prison had only open and semi-open accommodation (the latter mostly for remand prisoners).

⁴ There are six prisons in Greenland (with a total capacity of 153) but the remaining five are all small (10 – 15 places) open-type establishments. It should be added that only Nuuk Prison accommodates female prisoners. It is also noteworthy that Greenland has a high incarceration rate (271 per 100,000 of national population as of mid-2023, see <https://www.prisonstudies.org/country/greenland-denmark>), way above the corresponding figures for the mainland Kingdom of Denmark (71/100,000) and also much higher than the Council of Europe median of 107/100,000 (see Prisons and Prisoners in Europe 2023: Key Findings of the SPACE I survey https://wp.unil.ch/space/files/2024/12/SPACE_I_2023_Key_Findings.pdf).

⁵ Most recently in 2008, see in particular paragraphs 79 and 80 of document CPT/Inf (2008) 26.

⁶ It is important to add that, as the delegation was told at the outset of the visit to Nuuk Prison, the transfer from Herstedvester Institution to Nuuk Prison has been exclusively on a voluntary basis (some ten Greenlandic inmates have reportedly chosen to remain in Herstedvester because of family ties in the mainland Kingdom of Denmark) and even those already transferred to Greenland were allowed to reverse their decision twice (i.e. to request to be sent back to Herstedvester and from there again to Nuuk).

⁷ See e.g. paragraph 22 of the report on the 2012 ad hoc visit to Greenland.

⁸ The Criminal Law of Greenland (*Bekendtgørelse (af 18. September 2023) af Kriminallov for Grønland*) does not permit the imposition of a longer fixed-term prison sentence (see Section 147).

⁹ Although theoretically possible under the law, Nuuk Prison has never accommodated any juveniles so far. The delegation was told by the management that in practice any Greenlandic juveniles who entered into conflict with the law would be directed towards a closed-type social institution run by the Greenland Self-Government (*Naalakkersuisut*).

8. As can be seen from the aforementioned figures, Nuuk Prison was officially overcrowded at the time of the CPT's visit,¹⁰ and especially regarding Unit A there was (according to the management) a clear upward trend, with more inmates with indeterminate sentences arriving than departing¹¹ and with a steady rise in the number of remand prisoners.

In this context, the delegation was told that the existing range of alternatives to remand detention (such as travel ban and obligation to report) and prison sentences (such as fines, community service, suspended sentence and parole) was not sufficient to counter this trend.

9. In light of the situation observed at Nuuk Prison, **the CPT recommends that efforts be made by the Danish authorities to increase the range and the recourse to alternative measures and sanctions in Greenland.** In this context, **reference is also made to corresponding recommendations set out by the CPT in the report on its 2024 periodic visit to Denmark (see paragraph 61 of document CPT/Inf (2024) 38) which apply *mutatis mutandis*.**

2. Ill-treatment

10. From the outset, it should be emphasised that the delegation received no allegations – nor any other indications – of physical ill-treatment of prisoners by staff at Nuuk Prison.¹² On the contrary, the atmosphere seemed to be quite relaxed and some prisoners spoke positively about particular members of custodial staff. That said, a few allegations were received of custodial officers having acted unprofessionally (e.g. shouting or using disrespectful language) vis-a-vis the inmates.¹³

The CPT recommends that it be recalled to custodial staff at Nuuk Prison that they must always treat prisoners with respect.

11. As for inter-prisoner violence, it did not appear to be a major problem in the establishment.¹⁴ However, both the management and staff acknowledged that conflicts between prisoners did sometimes occur, though as a rule they were not of a severe nature (mostly verbal altercations).

¹⁰ See paragraph 13 below regarding the practical consequences of this overcrowding.

¹¹ Prisoners with indeterminate sentences could, and indeed sometimes did, move to open units (there were six of them at the time of the visit) or to other (open) prisons (there were three such prisoners in Greenland at the time of the visit) based on the results of the periodic review of their behaviour and of the risk that they might pose.

¹² It is noteworthy in this context that the records of use of “special means” (truncheons, handcuffs, pepper spray and physical force/holding) indicated that such means were rarely employed at Nuuk Prison. For example, there had been no case of use of a truncheon in the course of 2024, and handcuffs, pepper spray and physical force had only been applied once each during that same year.

¹³ See also paragraph 25 below.

¹⁴ As also corroborated by the relevant incident and disciplinary records.

That said, there had been one serious incident in 2023, when an inmate had sexually assaulted another.¹⁵ Once informed, staff responded promptly and appropriately (separating the victim and the perpetrator,¹⁶ immediately informing the police and offering psychological assistance to the victim¹⁷), and the prisoner who had assaulted his fellow cellmate was punished disciplinarily and, eventually, was convicted by court and received an additional prison sentence.

Nevertheless, **the Committee recommends that both the management and the staff of Nuuk Prison exercise continuing vigilance in this context; in particular, more attention needs to be paid to assessing the risk of inter-prisoner violence when allocating prisoners to double-occupancy cells.** This is also linked with the problem of overcrowding (see paragraph 13 below) and insufficient custodial staff presence inside the prisoner accommodation areas (see paragraph 25 below).

3. Conditions of detention

12. The material conditions in Unit A of Nuuk Prison were on the whole excellent. The architectural design of the prison, with large windows without bars offering a pleasant view on the Nuup Fjord (*Nuup Kangerlua*), reduced the carceral feel despite the presence of all the modern security features.

Standard single-occupancy cells measured approximately 10 m² and were suitably equipped (beds with full bedding, desks, chairs, cupboards, fridges, TV sets, fully screened sanitary annexes comprising also showers, call systems), bright, well-lit and ventilated,¹⁸ clean and in a good state of repair. Throughout the day, prisoners could, as a rule, move freely within their sections¹⁹ and had access to well-furnished communal areas (with sofas, big tables and large TV sets) and fully equipped kitchens where they cooked their own meals;²⁰ each section also had a small sheltered outdoor smoking area.²¹

Further, twice a week prisoners had access to a well-stocked shop where they could buy not only food but also other daily necessities including hygiene items.²²

13. However, due to overcrowding, five of the single cells had had to be converted into double-occupancy (by fitting a bunk bed), which reduced the available living space for the prisoners placed in those cells.

¹⁵ It is noteworthy that the incident had occurred in one of the cells converted into double occupancy (see paragraph 13 below) and that no custodial staff were present inside the section concerned when it happened (see paragraph 25).

¹⁶ Due to the specificity of the prison system in Greenland (absence of any other establishment with closed-type accommodation), it was not possible to transfer the perpetrator to a different prison, but steps were taken to ensure that the two inmates had no contact with each other.

¹⁷ Who was subsequently released from prison.

¹⁸ Some of the cells had small balconies attached to them.

¹⁹ Sections comprised either 4 or 8 cells each.

²⁰ Except for prisoners placed in the segregation/security unit (see paragraph 28) who received food inside their cells.

²¹ Indoor smoking was prohibited.

²² All prisoners received a daily allowance sufficient to cover these expenses.

Furthermore, overcrowding had obliged the prison's management to place some sentenced prisoners in the same section as remand prisoners (resulting in restricting the sentenced inmates' access to the telephone)²³ as well as accommodating male prisoners in the same section as female inmates, which restricted access to the communal area for both.²⁴

Worse still, some remand prisoners had to (alternatingly) sleep at Nuuk Police Station. Apart from the general misgivings the CPT has about returning remand prisoners to police custody (because of an increased risk of ill-treatment, even if arguably this was not of real concern in the case of Greenland),²⁵ the solution applied by the management of Nuuk Prison (in collaboration with the police) had resulted in obliging the remand prisoners concerned to spend their nights in rather Spartan conditions;²⁶ in particular, prisoners complained that the cells at Nuuk Police Station were inadequately heated. In addition, some of the aforementioned inmates told the delegation that, because of being constantly transferred between the police and the prison, they had on occasion missed their shopping day and had thus been unable to prepare warm food for prolonged periods (that is, several days).²⁷

In the light of the above remarks, the CPT refers to its recommendation in paragraph 9 above. Further, the Committee recommends that steps be taken to ensure that all prisoners at Nuuk Prison (including those who spend the night at Nuuk Police Station) are enabled to have food (including warm meals) every day and at normal meal times. Steps should also be taken to improve the material conditions of detention at Nuuk Police Station, in particular the heating system.

14. At the time of the visit, Nuuk Prison was accommodating two female remand prisoners who had been arrested in connection with the same case and in respect of whom the police had decided that they could at no time have any contact with each other, due to the needs of the investigation.

The lack of available space within the prison had prompted the prison's management (again, in collaboration with the police) to devise a system whereby each of the two prisoners spent one day out of two at Nuuk Police Station.

It goes without saying that this arrangement was far from optimal from the CPT's point of view, for reasons referred to in paragraph 13 above.

²³ See paragraph 34 below.

²⁴ Since women and men were not supposed to associate, the solution found was to allow them into the communal part of their section for alternating successive 2-hour periods during the day.

²⁵ See also Rule 10.2 of the European Prison Rules: "In principle, persons who have been remanded in custody by a judicial authority and persons who are deprived of their liberty following conviction should only be detained in prisons, that is, in institutions reserved for detainees of these two categories."

²⁶ See the description of these cells in paragraph 20 of the report on the 2012 visit to Greenland (document CPT/Inf (2013) 3). Judging from what prisoners concerned told the delegation, conditions in them had not changed.

²⁷ As already mentioned, all prisoners but those in segregation/security had to buy food in the prison shop and prepare their own meals.

The Committee recommends that the authorities find a solution whereby both female remand prisoners concerned are enabled to remain at Nuuk Prison, without having to spend every other day at the police station.

15. As regards activities, the delegation was impressed by the fact that all sentenced prisoners were enabled to work²⁸ or study,²⁹ and that they could also get involved in arts (including music) and crafts (such as producing traditional items).

For those with indeterminate sentences, needs and risk assessments were carried out (with the help of the consultant psychiatrist and the psychologists)³⁰ and individualised sentence plans were drafted and regularly updated by the social workers. Also, a contact person (a staff member) was appointed for each of them. **The CPT recommends that the aforementioned practices be extended to all sentenced prisoners, including those with fixed-term sentences.**

16. The situation was less favourable with respect to remand prisoners for whom there was no work except for cleaning the corridors (for a few of them). Considering that some of the remand prisoners had already spent months if not years at Nuuk Prison,³¹ **the Committee recommends that efforts be made to enlarge the offer of organised activities (especially paid work) to this category of inmates.**

In this context, reference is also made to the recommendation in paragraph 71 of the report on the 2024 periodic visit to Denmark, which reads as follows:

“The aim should be to ensure that all prisoners, including those on remand, spend a reasonable part of the day (i.e. eight hours or more) outside their cells engaged in purposeful activities of a varied nature: work, preferably with vocational value; education; sport; recreation/association. The longer the period for which remand prisoners are detained, the more developed should be the regime offered to them.”.

17. On the positive side, all prisoners could take their outdoor exercise (in two large and adequately equipped yards) for at least one hour per day (and at least 1.5 hour in the summer).

They also had daily access to small gyms inside their sections and thrice weekly to a spacious indoor sports hall where they could play volleyball, basketball and indoor football, and follow gymnastics and yoga classes dispensed by a professional instructor. In the warmer part of the year, an outdoor sports pitch was available to them as well.

²⁸ In the furniture, fishing equipment and metal workshops, or on general cleaning and maintenance. It is to be added that engaging in work is required by law for sentenced prisoners.

²⁹ Individualised tuition (Greenlandic, Danish, English, mathematics, IT, cooking) proposed by two visiting teachers employed by the Greenlandic Self-Government.

³⁰ See paragraph 21 below.

³¹ Especially those who had appealed their sentences.

Further, all prisoners could borrow books, DVDs and CDs from the prison's library, and a selection of computer and board games was available to them in every section of Unit A.

In short, the situation in this respect was found to be fully satisfactory.

4. Health care

18. Although the delegation heard no complaints from inmates on this subject, the Committee must stress that the health-care staff complement at Nuuk Prison was insufficient.

The establishment had recently recruited a full-time nurse (present from 8 a.m. to 4 p.m. on weekdays) which was an improvement given that there had been no nurse at all in the prison between September and December 2024. The delegation was impressed by nurse's commitment; however, she had no prior experience of working in a penitentiary setting and was still getting to know her new job without benefitting from an adequate professional support. There was no nursing coverage at night or on weekends.

The CPT recommends that efforts be made to provide the nurse with professional support and to recruit a second full-time nurse to work at Nuuk Prison. This should permit a better nursing coverage (preferably also at night and on weekends). As a minimum, steps must be taken to ensure that a person competent to provide first aid (especially CPR³²) is always present at Nuuk Prison, including at night and on weekends; preferably, this person should be a qualified nurse.

Recruiting a second nurse would also make it possible to ensure that prisoners can directly approach the nurses with requests for consultations and that prescribed medication is systematically distributed to inmates by health-care professionals and not by custodial staff, thus ensuring the respect of medical confidentiality. This is mostly not the case at present.

The Committee must also stress that remand prisoners currently required to stay overnight (or, sometimes, the whole day) at Nuuk Police Station remain under the responsibility of Nuuk Prison; therefore, the aforementioned recommendations apply to them as well.

19. The delegation observed that there was no doctor who would visit Nuuk Prison on a regular basis and who would have the responsibility for the health-care service of the establishment: in case of need the nurse had to call the general switchboard of Queen Ingrid's Hospital (hereafter Nuuk Hospital) and rely on the guidance of whichever doctor was on duty at the given moment. Clearly, this was not a satisfactory arrangement and there was a real risk for the nurse to become overburdened with her task, despite all her best intentions.

³²

Cardiopulmonary resuscitation.

Whilst the Committee understands the practical difficulty related with the general shortage of medical specialists in Greenland, it must stress that prisoners are no ordinary patients. They generally have more health-related problems than the population at large and should benefit from particular attention from health-care professionals.

Consequently, **the CPT recommends that steps be taken to ensure that there is a medical doctor who visits Nuuk Prison on a regular basis and who has the formal responsibility for the management of the establishment's health-care service. Preferably, this should be a doctor with a previous experience of working in prisons and with a good understanding of the particular needs of prisoner population in terms of health care.**³³

The Committee would also like to be informed whether there exist any plans to secure inmates' remote access to medical consultations (telemedicine) at Nuuk Prison.

20. The delegation was concerned to note that there was no medical screening of newly-arrived inmates at Nuuk Prison. As the CPT has stressed many times,³⁴ this is unacceptable; such systematic screening is essential, in the interests of the prisoners and of the staff, in particular to identify special medical needs (including addictions and mental health needs), prevent the spread of transmissible diseases, reduce the risk of suicides and ensure the timely recording of any injuries. Save for exceptional circumstances, the medical screening of prisoners should be carried out on the day of admission, especially as regards those entering the prison system.

The Committee once again calls upon the authorities to take necessary measures to ensure that all prisoners are examined by a doctor, or by a qualified nurse reporting to a doctor, within 24 hours of their admission to Nuuk Prison. In this context, reference is also made to the recommendation set out in paragraph 80 of the report on the 2024 periodic visit to Denmark.³⁵

21. The Committee also has some concerns regarding the access to psychiatric care and psychological assistance for inmates at Nuuk Prison.

A consultant psychiatrist coming from the mainland Kingdom of Denmark visited the establishment for seven to ten days three times per year. In between her visits, she could also be consulted over the phone. However, her main task was to carry out and review (together with the psychologists, see below) needs and risk assessments for prisoners serving indeterminate sentences, with a particular focus on sex offenders.

³³ See paragraph 75 of document "Health care services in prisons. Extract from the 3rd General Report of the CPT, published in 1993" (CPT/Inf(93)12-part): "Prison doctors and nurses should possess specialist knowledge enabling them to deal with the particular forms of prison pathology and adapt their treatment methods to the conditions imposed by detention." See also Recommendation of the Committee of Ministers of the Council of Europe No. R (98) 7 concerning the ethical and organisational aspects of health care in prison.

³⁴ See e.g. paragraph 31 of the report on the 2012 ad hoc visit to Greenland (document CPT/Inf (2013) 3) and paragraph 80 of the report on the 2024 periodic visit to Denmark (document CPT/Inf (2024) 38).

³⁵ Document CPT/Inf (2024) 38.

The delegation was informed that many inmates at Nuuk Prison had a psychiatric diagnosis (including a psychosis for some of them) and were regularly taking psychotropic medication. In case of a need to hospitalise them (including in emergencies) the only available option was to transfer them to a specialised forensic psychiatric unit in Denmark,³⁶ which was unsurprisingly neither easy nor quick to arrange. There was reportedly no secure room for such prisoners at the psychiatric ward of Nuuk Hospital.

As for psychologists, there were two of them but – as already mentioned above – they essentially worked with inmates with indeterminate sentences whilst for the others, arranging a consultation with an outside psychologist was cumbersome and time-consuming (it could even reportedly take months).

In the light of the above remarks, **the CPT recommends that steps be taken to improve access to psychiatric care and psychological assistance for all inmates at Nuuk Prison. In particular, efforts should be made to set up, in co-operation with the Self-Government of Greenland,³⁷ a secure room for prisoners at the psychiatric ward of Nuuk Hospital.**

22. The delegation was told that many prisoners were habitual users of alcohol and illicit drugs (usually marihuana). Consumption of those substances inside the prison was a disciplinary offence but it tended not to be punished severely³⁸ and the focus was on offering prisoners an opportunity to address their consumption habit through counselling offered by outside organisations.

Reportedly, this was a well working arrangement; that said, **the Committee would welcome additional details of the alcohol and drug counselling and treatment programs available to inmates at Nuuk Prison.**³⁹ In this context, **the CPT would also like to receive information on whether it is envisaged to authorise custodial staff to administer naloxone (in the form of nasal spray) to prisoners in case of an opioids overdose.**⁴⁰

23. The delegation noted that free-of-charge condoms were available to prisoners in the visiting area of Nuuk Prison.⁴¹ Whilst welcoming this, **the Committee recommends that free-of-charge condoms also be made available to prisoners who do not receive visits, as a means to prevent the spread of transmissible diseases.**

³⁶ The Forensic Psychiatry Department of Aarhus University Hospital, visited by the CPT in May 2024 (see paragraph 127 *et seq.* of document CPT/Inf (2024) 38). Also prisoners in need of forensic psychiatric assessment were taken there.

³⁷ Which is competent in the area of public health care in Greenland.

³⁸ See also paragraph 26 below.

³⁹ See also paragraphs 84 and 85 of the report on the 2024 periodic visit to Denmark (document CPT/Inf (2024) 38, as well as paragraph 70 of the report on the 2019 periodic visit to Denmark (document CPT/Inf (2019) 35).

⁴⁰ See paragraph 86 of the report on the 2024 periodic visit to Denmark (document CPT/Inf (2024) 38).

⁴¹ See paragraph 33 below.

24. Some of the prisoners interviewed by the delegation who had been convicted for sex offences told the delegation's doctor that one of the reason why they had requested to be transferred to Nuuk Prison from Herstedvester Institution was that it was prohibited to administer libido-suppressing drugs (cyproterone acetate, commercial name Androcur) in Greenland.

The inmates in question said that they feared side-effects⁴² of such therapy⁴³ and preferred to be accommodated in a place where they felt "safe" despite the consequences of such transfer as regards the lower likelihood of obtaining release on parole or a transfer to an open prison.

In this context, **the CPT would like to be informed whether there exist any plans to authorise the use of Androcur (or any other substances with a similar action) in Greenland. Were this to be the case, the Committee refers to its comments on this subject made in paragraph 78 of the report on the 2008 periodic visit to Denmark, which are as follows:**

"The Committee considers that more attention should be paid to ensuring that these safeguards [including a written informed consent] are being fully respected in practice. In particular, special care should be taken to make sure that prisoners' consent to medical libido-suppressing treatment is genuinely free and informed. In this connection, the provision of full information (oral and written) on the known adverse effects – as well as the possible benefits – of the treatment, should be improved. Further, no prisoner should be put under undue pressure to accept medical libido-suppressing treatment. Moreover, in addition to drug treatment, efforts should be made to step up psychotherapy and counselling with a view to reducing the risk of re-offending."

5. Other issues

25. In principle, the custodial staff complement (18 senior and 20 junior guards, all full-time) appeared sufficient at Nuuk Prison.⁴⁴ However, the same could not be said of the custodial staff's attendance pattern [...] ⁴⁵, which was too low to provide a safe environment⁴⁶ in all seven sections located on the Unit's two floors and at the same time engage constructively with the inmates, especially given the trend towards an increase of prisoner population.

*Text deleted from the public version of the report upon the request of the Danish authorities.

⁴² Such as bone decalcification, dose-dependent liver damage, weight gain, breast enlargement and hot flushes.

⁴³ Which, it is important to stress, could anyway only be administered with the prisoner's informed consent.

⁴⁴ There were also *inter alia* three heads of units and two social workers.

⁴⁵ Sometimes less than this, given that the guards also had to help with escorting inmates within the prison and outside (e.g. for medical consultations in town).

⁴⁶ See paragraph 11 above.

In this context, many prisoners told the delegation that custodial staff would generally “keep to themselves” and would often fail to respond to inmates’ requests,⁴⁷ which had to be repeated several times before receiving any response. The delegation observed for itself during the visit that custodial officers spent most of their shift time inside their office and rarely entered the accommodation sections (unless required to do).

The CPT recommends that steps be taken to increase the number of custodial staff actually present inside prisoner accommodation sections of Nuuk Prison throughout the day. Custodial staff should also be encouraged to engage and communicate more with prisoners, in accordance with the concept of dynamic security. This will also need to be addressed in the context of initial and ongoing training of custodial officers, which should additionally put more emphasis on dealing with agitated and mentally disturbed prisoners.⁴⁸

26. The delegation noted that the sanction of disciplinary solitary confinement was imposed rarely and for relatively short periods (between one and seven days) at Nuuk Prison⁴⁹. Whenever the duration of disciplinary solitary confinement exceeded 3 days, the Director of the Prison and Probation Administration in Greenland had to approve the continuation thereof; that said, the Criminal Law of Greenland still allowed (unlike, as a rule, the Danish legislation) a maximum of 28 days of disciplinary solitary confinement⁵⁰. In this context, **reference is made to the recommendation in paragraph 92 of the report on the 2024 periodic visit to Denmark, which applies *mutatis mutandis*.**⁵¹

27. The disciplinary procedure – analogous to that described in the reports on the visits to Denmark⁵² – offered, in principle, adequate safeguards to prisoners (in particular, the right to be informed on charges, the right to be heard, the right to have access to materials supporting the charges, the right to be assisted by a fellow inmate from the same unit who was not involved in the incident, the right to approve and to receive a copy of the minutes of the hearing containing the decision and the right to appeal against the sanction).⁵³

⁴⁷ Also requests for information on relevant daily routines and procedures, see paragraph 37 below.

⁴⁸ See also the recommendation in paragraph 91 of the report on the 2024 periodic visit to Denmark (document CPT/Inf (2024) 38).

⁴⁹ An analysis of the year 2024 showed that solitary confinement had been imposed 17 times, out of which nine times for just a day, twice for two days, three times for three days, once for five days, once for “five to seven days” (as worded in the relevant disciplinary decision) and once for seven days.

⁵⁰ See Section 228 (3) of the Criminal Law of Greenland. The sanction may be imposed only in respect of the inmate’s free time. Other available sanctions are a warning, a fine and revoking a leave (for leave-related infringements, see Section 227). The Prison and Probation Administration in Greenland has issued guidelines on standard reactions in disciplinary cases, updated in November 2022 (*Vejledende normalreaktioner i disciplinaersager*).

⁵¹ Document CPT/Inf (2024) 38. The recommendation reads as follows: “the CPT strongly reiterates its recommendation that disciplinary solitary confinement should never be imposed for more than 14 days for a given offence (and should preferably be shorter). Whenever an additional period of disciplinary solitary confinement is imposed on a prisoner, there should be an interruption of several days between the two placements [...]”.

⁵² See e.g. paragraph 96 of CPT/Inf (2024) 38. The Prison and Probation Administration in Greenland has issued guidelines on the handling of disciplinary procedures, updated in March 2018 (*Vejledning om disciplinaere foranstaltninger mv*).

⁵³ In the records of disciplinary hearings examined by the delegation, a note was always made of the fact that prisoners concerned had been asked whether they wished to receive a copy of the

However, some of the inmates who had been placed in disciplinary solitary confinement alleged not having received a copy of the decision and not having been informed of the right to appeal.⁵⁴ **The CPT recommends that inmates at Nuuk Prison be systematically provided with a copy of the disciplinary decision, the receipt of which they should be asked to acknowledge in writing.**

28. Nuuk Prison did not possess dedicated disciplinary cells. Instead, prisoners were placed in one of the three single-occupancy cells located in a separate corridor (the segregation/security unit) designated for exclusion from association, which also contained two “observation” cells and a “security” cell (see paragraph 30 below).

Conditions in the aforementioned three cells were fully adequate: they measured approximately 15 m² each and contained damage-proof furniture (sleeping platforms, desks and chairs), fully partitioned damage-proof sanitary annexes (including showers), mattresses with full bedding, TV sets and call bells. Windows were fitted with damage-proof glass (with bars on the outside) which allowed plenty of natural light. Further, the cells had adequate artificial lighting and ventilation and were clean and in a good state of repair.

Prisoners in disciplinary solitary confinement could wear their own clothes and keep their personal items and reading matter, and were allowed to use a dedicated suitably equipped exercise yard (measuring some 60 m²) for one hour each day. If the period of disciplinary solitary confinement lasted in excess of three days, they could also receive visits.

29. At the time of the visit, two of the above-mentioned cells were used to accommodate prisoners isolated upon their own request. They had no association with each other or with other inmates and their only human contacts were in the form of occasional short conversations with custodial officers.

The Director and other members of the management of Nuuk Prison told the delegation that they were concerned about the situation of those two prisoners, in particular one of them who had been isolated since September 2024 and was likely to remain alone for some time given the reasons behind his voluntary isolation (due to his profile and the nature of his crime).⁵⁵

disciplinary decision or not. In case of summary disciplinary proceedings a copy of the decision was always given to the prisoner; in case of standard proceedings (involving an oral hearing), such a copy was only provided upon the inmate's request (similar to what had been observed by the CPT's delegation during the 2024 periodic visit to Denmark). Every disciplinary decision also contained information about the right to appeal.

⁵⁴ According to Section 245 of the Criminal Law of Greenland, inmates have the right to appeal the decision to the Director of the Prison and Probation Administration in Greenland within 2 months. A delay in lodging the appeal may be excused if justified. An appeal to a court is only possible in respect of a disciplinary sanction of solitary confinement exceeding seven days (Section 246).

⁵⁵ The other prisoner had reportedly requested to be placed in isolation because of a conflict with fellow inmates, likely linked with an unpaid debt (although he did not want to specify the exact reason).

Attempts were being made to convince both prisoners (but especially the prisoner in question) to reintegrate the general accommodation. Unfortunately, one of the arguments used was to deprive them of their right to use their mobile telephones,⁵⁶ which only increased their sense of isolation⁵⁷ (although, admittedly, they could receive visits daily except for Thursdays).

The Committee recommends that efforts to address the situation of the two prisoners in voluntary isolation be continued; this should include authorising them to continue using their mobile phones. The overall aim of these efforts should be to convince the prisoners concerned to gradually reintegrate the main prisoner population; meanwhile, they should be offered meaningful human contact (either with one or more carefully selected fellow inmates or, if impossible, with dedicated custodial staff) for at least two hours per day. They should also be visited by the nurse and one of the psychologists on a daily basis, in order to monitor their physical and mental health and provide necessary assistance, as required. In particular, any observed signs of deterioration of their mental health should prompt the nurse to contact the psychiatric ward of Nuuk Hospital, in order to arrange a psychiatric consultation. Reference is also made here to the recommendation set out in paragraph 102 of the report on the 2024 periodic visit to Denmark,⁵⁸ which applies *mutatis mutandis*.

30. Nuuk Prison possessed two “observation” cells and one “security” cell (where agitated and/or aggressive inmates could be subjected to fixation). The rules applicable to such placements were analogous to those already described in the reports on the CPT’s visits to the mainland Kingdom of Denmark.⁵⁹

Conditions in the aforementioned cells could be considered as adequate. The “observation” cells measured approximately 15 m² and were each equipped with a bed (with a rip-proof mattress and blanket), a removable table and a bench as well as a call system and an observation window giving towards the corridor. Access to natural light, artificial lighting and ventilation were good, as were the state of repair and cleanliness. The “security” cell was similar except that the bed frame was fitted with attachments for leather immobilisation belts.

The cells were very rarely used,⁶⁰ which is positive. However, the delegation found, in the relevant records, an example of a very long placement in the “security” cell in 2023 (almost 26 hours) of an agitated prisoner with an acute mental health disorder who had been fixated for most of this time.⁶¹

⁵⁶ See paragraph 33 below.

⁵⁷ Both could still make telephone calls twice a week, using a payphone.

⁵⁸ Document CPT/Inf (2024) 38. The recommendation reads as follows: “the Committee recommends that steps be taken to strengthen the psycho-social support provided to prisoners segregated on security grounds. More generally, such prisoners should be followed individually by multidisciplinary teams involving the custodial, social and health-care staff, the objective being to assist the prisoners concerned to gradually (re)integrate the mainstream prison population.”

⁵⁹ See, in particular, paragraphs 103 and 107 of the report on the 2024 periodic visit to Denmark (document CPT/Inf (2024) 38).

⁶⁰ E.g. “observation” cell twice in 2024, twice in 2023 and also twice in 2022; “security” cell not at all in 2024, once in 2023 and once in 2022.

⁶¹ Fixation was partly lifted after 23 hours.

Regarding the procedure and based *inter alia* on interviews with prisoners and staff and on the examination of relevant records dating as far back as 2021, it was not possible for the delegation to fully ascertain whether there had always been permanent ongoing supervision by custodial staff of prisoners placed in a “security” cell (and fixated),⁶² whether a nurse and a psychologist always visited the prisoners concerned at the outset of the measure⁶³ and whether there always was a debriefing with the inmate after the end of the measure.⁶⁴

31. In the light of the above observations, **the Committee refers to its remarks and recommendations on the use of “security cells” and fixation in prisons, as set out in paragraph 111 of the report on the 2024 periodic visit to Denmark, which apply fully also to Nuuk Prison:**

“The CPT must stress once again that agitated prisoners who pose a serious danger to themselves or to others may be temporarily isolated in a calming down cell until they restore behavioural control, only as a last resort when all other reasonable options (such as talking to the prisoners in question) have failed to satisfactorily contain these risks. As regards prisoners displaying severe mental health issues, they should be transferred to a psychiatric facility where they can receive the necessary care.

The Committee reiterates the recommendation that the Danish authorities abolish the practice of fixation of prisoners for security reasons and develop alternative approaches; the CPT would like to be provided with a detailed plan to achieve this objective. Pending this, the Danish authorities must ensure that the following minimum safeguards are strictly applied in all prisons resorting to fixation:

- **fixation may only be used as a measure of last resort, when all other reasonable options have failed satisfactorily to deescalate violence; previous (unsuccessful) measures should be clearly indicated either in the decision to apply fixation or in dedicated register;**
- **any fixation may only be of a very short duration (minutes rather than hours);**
- **fixation may only be resorted to in a medical setting, namely as expressly ordered by a doctor or immediately brought to the doctor’s attention.**

⁶² Reportedly, in some instances staff had only checked on the prisoner in intervals of 15 to 30 minutes (or even once an hour).

⁶³ It would seem that a duty doctor at Nuuk Hospital would as a rule be called at the start of the measure (but it was then up to the doctor to decide whether to come to the prison) but as regards the nurse and psychologist, their visits depended on whether the prisoners concerned had expressly requested to see them or whether custodial staff estimated that the prisoners’ physical and/or mental health required it.

⁶⁴ Although information on the right to complain against the measure to the Director of the Prison and Probation Administration in Greenland appeared to be provided systematically.

The doctor should proactively visit fixated prisoners immediately upon fixation to document and treat any injuries, review the prisoners' health condition as well as assess the necessity to continue applying the measure;

- **fixated inmates should be under continuous, personal and direct supervision by prison staff physically present in the "security cell"; observing patients through a window is not sufficient.**

Further, the CPT recommends that steps be taken to ensure that debriefing sessions involving the prisoners concerned and custodial and health-care staff are organised following each measure of fixation, for oversight and learning purposes. [...] The Committee also recommends that appropriate initial and refresher training be provided to staff regarding the use of fixation and de-escalation techniques."

32. The delegation spoke with two inmates who had been placed in "observation" cells (for 18 and 25 hours respectively) and who alleged to have been obliged to strip naked (in one case) or remain in the underwear only (in the second case) throughout their placements, having only a blanket to cover themselves. **The CPT is of the view that the default approach should be to allow prisoners to keep their own clothes whilst in an "observation" or a "security" cell. If, based on an individualised risk assessment, staff concludes that it is necessary to remove their clothes, prisoners must be provided with appropriate rip-proof clothing.**

In addition, one of the prisoners concerned alleged that on at least one occasion during his placement he had not been allowed to use the toilet and that he had had to urinate on the cell floor. **The Committee recommends that steps be taken to ensure that prisoners placed in "observation" and "security" cells are always enabled to use the toilet without delay.**

33. As regards the arrangements for sentenced prisoners' contact with the outside world, the rule was that such inmates could receive short-term (at least one hour) visits daily, and those with indeterminate sentences could also receive long-term (48 hours) conjugal visits.⁶⁵ The visiting facilities were of an excellent standard⁶⁶ and, in particular, enabled visits to take place under open conditions. Whilst commending this generous visiting entitlement, **the CPT invites the authorities to grant access to long-term visits to all sentenced prisoners accommodated at Nuuk Prison, including those with fixed-term sentences.**

⁶⁵ Conjugal visits were reserved for spouses (or at least persons capable of proving the fact of being in a long-term relationship with the inmate), children and parents.

⁶⁶ Short-term visit rooms contained each a bed, a table, chairs, a TV set, a fully screened sanitary annexe and a small balcony. The apartment used for long-term visits was of an even higher standard, with a bedroom and a fully equipped kitchen.

Sentenced prisoners were allowed to have mobile telephones (basic models without cameras) in their cells and there were no restrictions for them as regards the frequency and the duration of calls, as well as the telephone numbers they could call (provided there was no abuse).⁶⁷

34. The situation was less favourable for remand prisoners, who could in principle receive a visit (short-term only) twice a week and use a payphone for 10 – 15 minutes once a week. The entitlement was even lower for remand prisoners with police-imposed restrictions (“B&B”⁶⁸) who could receive one short-term visit per week (always in the presence of a police officer) but were as a rule not allowed to make telephone calls (save for very important personal reasons and with a prior authorisation from the police).

The Committee recommends that efforts be made to increase the telephone calls entitlement for remand prisoners accommodated at Nuuk Prison. Consideration should also be given to enabling remand prisoners whose families live far away to receive long-term visits.

As for remand prisoners subjected to “B&B” restrictions, reference is made to the recommendation in paragraph 121 of the report on the 2024 periodic visit to Denmark, which applies *mutatis mutandis* also to Nuuk Prison. The recommendation in question reads as follows: “Regarding access to a telephone, this must be granted as a rule; if there is a risk of collusion, calls to a particular person could be restricted by a prosecutor for a certain amount of time but, in any event, the privileged option should be that particular telephone calls could be monitored (rather than prohibited).”

35. On a positive note, the CPT welcomes the initiative to allow all prisoners (including those on remand not subjected to “B&B” restrictions) whose families resided far away from Nuuk to make (once weekly) video calls using the Voice over Internet Protocol (VoIP) technology.

36. The delegation observed that after (and sometimes also prior to) visits prisoners were *quasi* systematically subjected to strip searches, and the strip search procedure did not follow the two-step (first top half, then bottom half) rule recommended by the CPT. On this subject, **the Committee refers to its remarks and recommendations set out in paragraph 118 of the report on the 2024 periodic visit to Denmark**, which are fully applicable to Nuuk Prison as well.

⁶⁷ See, however, paragraph 13 above.

⁶⁸ “Brev-og besøgsforbud”. There were 14 remand prisoners with such restrictions at Nuuk Prison at the time of the delegation’s visit, and the delegation was told by the management that it was quite usual for remand prisoners to be subjected to “B&B” in the first weeks of their imprisonment.

The said remarks and recommendations read as follows: “As stated many times in the past, the Committee is of the view that strip searches are very invasive measures that must therefore be proportionate and duly justified. They should only be carried out when there are reasonable grounds to suspect that prisoners may have hidden on themselves items that may be used to harm themselves or others or in the case where there may be evidence of a crime (e.g. smuggling in prohibited items) and a more in-depth search is necessary. In the light of the above, the CPT recommends that the Danish authorities ensure that the decision to impose a strip search on a prisoner is indeed always based on an individual risk assessment. As concerns the procedure, the Committee reiterates its recommendation that prisoners who are subjected to a strip search be allowed to remove clothing above the waist and redress before removing further clothing.”

37. Inmates at Nuuk Prison were allowed to lodge complaints⁶⁹ both internally (with the prison's management) and externally,⁷⁰ *inter alia* with the Prison and Probation Administration and the Greenlandic and Danish Parliamentary Ombudspersons.⁷¹ However, several prisoners (especially those recently arrived at the establishment) complained about the lack of information on complaints procedures (and more generally, on the prison's house rules⁷²) as well as the absence of feedback on the outcome of their complaints. Moreover, one of the prisoners alleged that custodial staff had attempted to dissuade him from making a formal complaint (saying that doing so would not be “good for him”).

The CPT recommends that the management of Nuuk Prison firmly reminds all the staff members that they should never dissuade prisoners from exercising their right to address complaints, both internally and to competent outside bodies.

Further, steps must be taken to ensure that all prisoners, particularly newly-arrived ones, are systematically provided with information about the prison's house rules and their rights including the rights to referred to above.

38. As regards independent inspections, the delegation was informed that Nuuk Prison had *inter alia* been visited by the Danish Ombudsperson,⁷³ the UN Special Rapporteur on the Rights of Indigenous Peoples⁷⁴ and by the Danish Bar Association (focusing on the access to justice aspects).⁷⁵

⁶⁹ The complaints procedure was analogous to that applied in the mainland Kingdom of Denmark, see paragraph 124 of the report on the 2024 ad hoc visit to Denmark (document CPT/Inf (2024) 38).

⁷⁰ Including by telephone.

⁷¹ The Greenlandic Ombudsman was only competent for areas within the responsibility of the Self-Government of Greenland (such as education, health care and social assistance).

⁷² Although there was a brochure – in Danish and Greenlandic – containing information on the house rules and the complaints procedure, not all prisoners appeared to be aware of its existence.

⁷³ Last time in October 2021, see <https://www.en.ombudsmanden.dk/about-the-ombudsman/monitoring-activities/monitoring-visits-to-institutions-where-citizens-live/monitoring-visits-according-to-un-rules/monitoring-visits-to-institutions-for-adults-in-2021>.

⁷⁴ In February 2023, see <https://www.ohchr.org/en/documents/country-reports/ahrc5431add1-visit-denmark-and-greenland-report-special-rapporteur-rights>, in particular paragraph 66.

⁷⁵ The report on this visit was published in September 2024, see <https://www.advokatsamfundet.dk/publikationer-og-boger/rapporter-og-vejledninger-1/advokatrådets-rapport-om-retssikkerheden-i-grønland/>, especially pages 41 and 42.

APPENDIX

LIST OF OFFICIALS WITH WHOM THE CPT'S DELEGATION HELD CONSULTATIONS

Nuuk, Greenland

Christian Høygaard	Director of Prison and Probation Administration in Greenland
Trine Chemnitz	Head of Rehabilitation, Prison and Probation Administration in Greenland
Sofie Anna Krogner-Fleming	Lawyer, Prison and Probation Administration in Greenland
Peter Fomsgaard	Director of Nuuk Prison
Carsten Brødsgaard	Head of Unit, Nuuk Prison
Magdaline Huch	Head of Unit, Nuuk Prison
Jacob Didriksen	Head of Unit, Nuuk Prison
Nanna Hildebrandt	Psychologist, Nuuk Prison

Copenhagen

Mette Kjølby	Acting Director, Centre for Sentence Enforcement, Prisons and Probation Administration
Christian Trøst Rasmussen	Chief Financial Officer, Prisons and Probation Administration
Søren Ahrensberg	Information Technology Director, Prisons and Probation Administration
Hans Ehlers	Head of Business-IT and Infrastructure, Center for IT and Digitisation, Prisons and Probation Administration