



Danish Shadow Report to GREVIO

2023

**DET NATIONALE
VOLDSOBSERVATORIUM**

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Introduction

The Danish National Observatory on Violence against Women, headed by The Women's Council Denmark, welcomes the invitation from GREVIO to contribute to the evaluation of the Danish implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention) with a shadow report.

We hope that the present shadow report will add useful information, perspectives, and recommendations to monitoring the Danish implementation of the Istanbul Convention. In addition, the shadow report might be a valuable tool in intensifying our dialogue with the Danish Parliament, the Government and other stakeholders concerning the optimal implementation of the Convention in Denmark.

The Danish National Observatory on Violence against Women consists of 30 experts who cover various aspects of gender-based violence. The Observatory exchanges experience and collects information to initiate and strengthen the prevention of gender-based violence and violence against women in Denmark, encouraging government bodies to meet national and international action plans and conventions. The Observatory was established in 1997 by the Women's Council Denmark, with re-appointments of experts every third year. The Observatory is affiliated with the European Women's Lobby's Observatory on Violence against Women.

The present shadow report relies on the experiences and knowledge of the members of the Observatory and, by invitation, the Danish NGOs Refugees Welcome and Digitalt Ansvar ("Digital Accountability"), who have contributed to the report on specific areas.

In our opinion, the Istanbul Convention covers the significant issues of violence against women and is vital in combating violence against women. We commit ourselves to contribute to and push for implementation in Denmark of the convention and shall provide GREVIO with further information if needed.

On behalf of the signatories,

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Part I: Changes in comprehensive and co-ordinated policies, funding and data collection in the area of violence against women and domestic violence

Article 7: Comprehensive and co-ordinated policies

Background

Since GREVIO's baseline evaluation of Denmark in 2017, the Danish government has initiated many legal, political, judicial, and financial initiatives to further the implementation of the Istanbul Convention. Efforts have been made to strengthen the prevention, protection, and prosecution of all forms of violence against women and domestic violence. The latest four-year national action plan, »Action Plan against Partner Violence and Homicides« (hereinafter »the Action Plan«), published in June 2023 by the government,¹ launches 26 initiatives to improve action against violence against women and domestic violence within the areas of legislation, healthcare, social welfare, civil society and the penal system. The Action Plan complements the permanent measures already in place in the social services, healthcare, and legal systems.²

The Action Plan is the first of its kind in Denmark to also introduce initiatives against partner killings, and both domestic partner violence and killings are seen as gender equality and societal problems to be treated as a societal responsibility.

The Action Plan focuses on co-ordination and early detection of partner violence, early, practical and effective efforts, and a greater focus on the perpetrator.

Challenges

In the (Baseline) Evaluation Report on Denmark,³ GREVIO strongly encouraged the Danish authorities "... to increase the level of attention paid to women victims of gender-based violence in policy documents and funding choices and to ensure the full recognition of the different forms of violence against women covered by the Istanbul Convention as gender-based violence."

All though the new Action Plan initially recognises women as victims of violence and domestic violence and as more often exposed to severe physical violence, the Action Plan is generally gender-neutral, as also indicated by its title. Likewise, national legal provisions on violence are still gender-neutral (except for Section 245 a of the Criminal Code concerning female genital mutilation) and address both men and women as perpetrators and victims.

The Action Plan intends to strengthen the efforts and sets a course for more holistic and preventive efforts against partner violence and partner killings. It introduces "partnerships" for strengthening coordination and cooperation among public actors and between public and

¹ Regeringen, [Handlingsplan mod partnervold og partnerdrab](#), 2023.

² Reference is made to the [Danish State Report addressed to GREVIO](#), July 2023, pp. 4-11.

³ GREVIO, [\(Baseline\) Evaluation Report on Denmark](#), 24 November 2017, para 10.

civil society actors. It also requires improved municipal preparedness to detect and handle violence in intimate relations. Likewise, it requires strengthening knowledge among health personnel of the detection and handling of violence against pregnant and new parents, thus integrating more authorities in combatting violence against women and domestic violence.

The Danish National Observatory on Violence against Women (hereinafter »the Observatory«) welcomes the 26 initiatives of the Action Plan. In many respects, it represents progress in the prevention and combatting of violence against women and domestic violence. The Observatory also welcomes the introduction of partner homicides in the Action Plan. The plan intends to take a holistic and coordinated approach to prevent partner violence and homicides. Within the police, initiatives have already been taken to strengthen the coordination of procedures with special units, and within the social and health sectors, such initiatives have been introduced in the new Action Plan. The vaguely defined “partnerships” for combatting violence in intimate relations and partner killings intend to increase coordination and cooperation across actors. Also, the introduction of the so-called “intervention model” for collaboration between the police, the municipality, and NGOs is an attempt to improve early detection of domestic violence through coordination of the actions against partner violence and killings. However, the implementation of the model is still very early days. So is the Alliance on Preventing Sexual Harassment between the social partners and the government regarding combatting sexual harassment.

Primary prevention of gender-based violence has never been a priority in any of the national action plans. All the action plans have used the word prevention several times, but there has been no resources and concrete primary preventive initiatives aligned, in contrast to other action plans, such as the most recent Action Plan to combat gang violence.

The responsibility for the Action Plan lies in an inter-ministerial working group headed by the Ministry of Digitalization and Gender Equality. However, the working group, has no cross-sectorial mandate, which weakens its strategic competence. Neither are projects and activities anchored in a long-term, national, coordinated strategy, as noted by GREVIO in the (Baseline) Evaluation Report on Denmark.⁴ Furthermore, most of the initiatives are in a trial or very early phase of implementation.

As described in the Danish State Report addressed to GREVIO,⁵ the efforts to prevent honour-based violence and abuse are based solely on a comprehensive plan and cross-sectorial cooperation by national and local authorities. The Danish Agency for International Recruitment and Integration under the Foreigners and Integration Ministry operates a national coordination group across authorities, network meetings for municipal professionals, a leadership network, and a specialised network for researchers and specialised professionals dealing with honour-based violence and abuse.

⁴ GREVIO, [\(Baseline\) Evaluation Report on Denmark](#), 24 November 2017, para 39.

⁵ [Danish State Report addressed to GREVIO](#), July 2023.

Recommendations

1. Denmark should provide a long-term, gender-sensitive, national strategy based on a holistic and comprehensive effort, as recommended by GREVIO in its (Baseline) Evaluation Report, Recommendation 19. The effort should rest on an understanding of the interconnectedness of all forms of violence against women and femicides. It should include physical, psychological, sexual, economic, and digital violence against women and in intimate relations, femicide and partner homicide, stalking and social coercion and other honour-related crimes. The actions should include permanent primary prevention of all the mentioned forms of violence against women, and the actions should include early detection, protection of and support and treatment for all victims of intimate violence and at risk of partner killings – adults as well as children. Also, actions should be directed towards perpetrators.
2. Denmark should establish a permanent interdepartmental coordinating body with clear mandates, powers, and competencies to ensure the implementation of the strategy, cf. GREVIO's Recommendation 39. For example, the implementation could be organized through various committees, such as primary prevention, early detection, risk assessment, -management and protection, etc. The coordinating body should also facilitate coordination and cooperation between state, regional and municipal authorities involved with victims of gender-based violence. The coordinating body should have the necessary human and financial resources to ensure monitoring of the strategy's implementation.
3. Denmark should ensure that legislation concerning intersectoral exchange of personal data – as known in relation to local prevention of juvenile crime/delinquency by schools, social welfare offices and police (the »SSP Cooperation«) – is amended to enable exchange across authorities in order to detect and prevent violence against women and partner killings.
4. Denmark should ensure that the strategic plan is based on victims' legal rights set out in the Consolidation Act on Social Services (»Serviceloven«) to ambulant counselling and treatment, stay, support and treatment in shelters and to aftercare for all victims of gender-based violence (regardless of gender, age, ethnicity, disability, or sexual orientation). Also, all victims should be guaranteed legal rights to protection against and prosecution of the perpetrator and to compensation.

Article 8: Funding

Background

In the 2023-2026 Action Plan,⁶ 136,1 million DKK (18,265,420 euros, or 4,566,366 euros annually) are allocated to cover the cost of 14 project/activities. This is the biggest allocation for

⁶ Regeringen, [Handlingsplan mod partnervold og partnerdrab](#), 2023.

a Danish action plan in the field. Furthermore, 19,6 million DKK (2,63 million euros) are allocated in 2024, 36,2 million DKK (4,85 million euros) in 2025 and 2026, respectively, and 36 million DKK (4,82 million euros) from 2027 and permanently for an action plan.⁷

Furthermore, several important prevention, protection and treatment projects and activities are funded separately for some years by the Finance Act and various national budgetary reserves.

Lev Uden Vold (in English »Live Without Violence«), which is Denmark's National Unit to secure assistance for victims of partner violence and knowledge to professionals, is funded by specific allocations a few years at a time. The same applies to the organisation's projects and educational activities for professionals. The National Unit is financially secured until 2025.

Challenges

All though the funding of the Action Plan and efforts against partner violence and homicides is historically high and thus welcomed by the civil society, it must be assessed in a bigger context. The public welfare sector generally suffers from several years of underfinancing with stringent budgets in both the social, health and educational sectors. The underfinancing has caused underpayment and a lack of staff in all three sectors and impedes cooperation between public institutions and NGOs. Furthermore, very tight budgets have affected specialised social services in the municipalities. The situation in general reflects on for example activities of shelters. It hampers the shelters' treatment of and support to victims and children during their stay at shelters and the aftercare for victims.⁸

It is a challenge that no government funds for coordinating and monitoring efforts are allocated to a government institution.

Furthermore, the short-term funding for many NGO and civil society projects and activities creates economic uncertainty and hampers strategic planning and the employment situation in the organisations.

Recommendations

1. To meet the intention of Article 8 of the Istanbul Convention, Denmark should ensure that national action plans cover all forms of violence against women, and specific budgets should be allocated to primary prevention and to secondary prevention of health and societal consequences of exposure to physical, sexual and psychological violence, including digital violence and harassment, social coercion and honour-based violence. Specific, permanent funding should be provided for a coordinating and monitoring body, as well as for the national unit Lev Uden Vold, to secure the unit's independence and sustainability.

⁷ Reference is made to the [Danish State Report addressed to GREVIO](#), July 2023, pp. 11-15.

⁸ Reference is made to comments on Article 22.

2. NGOs working with victims of violence against women should, to a larger degree, be permanently funded via the Finance Act.

Article 11: Data collection and research

Background

Fully publicly funded and driven research on violence against women is relatively limited (e.g. research conducted by Statistics Denmark). In some instances, organisations, such as universities and research institutions, collaborate with or conduct work for the Government. However, most research is conducted by private and (semi-)public organisations that compete for external funding (NGOs, universities, hospitals, etc.). This means that most research initiatives rely on external financial support, including much of the research highlighted in the Danish State Report to GREVIO.⁹

Despite the above-mentioned facts, several large-scale surveys are regularly conducted in Denmark. For example, the Ministry of Justice is responsible for the Danish National Crime Victim Survey (hereinafter »CVS«), which includes measures on partner violence, physical, psychological, and sexual violence, and some internet-facilitated crimes. As described in the State Report to GREVIO, the CVS has been updated in several essential ways since the (Baseline) Evaluation Report on Denmark.¹⁰

The Ministry of Social Affairs oversees the data collection process at shelters designed to uncover women's experiences at shelters. The data collected from shelters remains crucial for various stakeholders, including policymakers, researchers, and advocacy groups. Historically, this data collection process involved year-round efforts, with women collaboratively working with shelter staff to provide information about their experiences.

For further examples of recent and ongoing research in Denmark on violence against women and related subjects, please see Appendix I.

⁹ Reference is made to the [Danish State Report addressed to GREVIO](#), July 2023, pp. 11-15.

¹⁰ Maria Libak Pedersen, Mikkel Møller Okholm & Flemming Balvig, [Udsathed for vold og andre former for kriminalitet. Offerundersøgelserne 2005-2021. Hovedtal](#), Justitsministeriet, March 2022, Maria Holst Algren & Bjarne Laursen, [Vold og overgreb i Danmark 2021. Analyser baseret på Sundheds- og sygelighedsundersøgelserne 2005, 2010, 2017 og 2021](#), Statens Institut for Folkesundhed, 2022, Laura Deen, Katrine Bindsbøl Holm Johansen, Sanne Pagh Møller & Bjarne Laursen, [Vold og seksuelle krænkelse. En afdækning af omfang og udvikling af fysisk vold og seksuelle overgreb og omfang af seksuelle krænkelse samt en analyse af erfaringer med digitale seksuelle krænkelse](#), Statens Institut for Folkesundhed, 2018.

Challenges

Unfortunately, public funds dedicated to research on violence against women appear limited and there is to our knowledge no accessible overview of the public funding allocated to research in the field.¹¹ Furthermore, private funding is generally restricted to the funding agency's specific focus area, which, to a certain extent, forms the national research agenda on violence against women. As a result of the above-mentioned factors, most research on violence against women in Denmark is conducted as isolated research projects, and most projects are relatively limited in scope, small-scale, short-term, and cross-sectional rather than longitudinal. Furthermore, much research is only available in Danish and thus not disseminated internationally, which limits international access and collaborations.

Another related issue impeding research on violence against women, is the limited availability of national, sharable, high quality research databases covering the various forms of violence against women, which also partly stems from the lack of available research funding. Several organisations (both private and public) have attempted to develop/improve databases on violence against women-related measures, but have so far been unsuccessful due to practical, legal, and financial challenges.

Currently, there is no complete overview of Danish research on neither violence against women nor the impact the violence has on female victims. Furthermore, most research on violence against women, including most national statistics, do not adequately cover inequalities and vulnerabilities (e.g., socioeconomic status, race, age, gender, sexual orientation, and disabilities) in relation to risk of perpetration, risk of victimization and re-victimization, and access to formal support. Doing so is important to prevent violence and improve care for underserved populations.

Regarding the shelter statistical data, a significant change in the data collection practice was implemented in 2023. The Ministry of Social Affairs transitioned from a continuous data collection approach to a biannual system, with a specific two-week interval for gathering data. Notably, the resulting statistical data is not published annually but rather every other year. While shelter statistical data offer valuable insights into the experiences of women who have encountered domestic violence, this change represents challenges in preserving a comprehensive shelter data.

Recommendations

1. Denmark should support and increase research on violence against women in universities and research institutions.

¹¹ This is not clarified in the [Danish State Report addressed to GREVIO](#), July 2023, pp. 11-16.

2. Denmark should ensure that all research, including the CVS, include aspects of health inequalities and vulnerability factors such as socioeconomic status, race, age, gender, sexual orientation, and disabilities, etc.
3. Denmark should facilitate more international collaboration and benchmarking (i.e. at a minimum making findings of results available in English, utilising internationally standardised measures where applicable).
4. Denmark should increase public funding for research on violence against women and make funding processes and decisions more transparent.
5. Denmark should support the development of databases on violence against women, facilitate longitudinal surveys, and implement relevant results.
6. Denmark should establish a national femicide watch.
7. Denmark should conduct an overview of Danish research on violence against women to avoid overlapping and fragmented research on violence against women.

Denmark should consider reintroducing a more frequent and continuous data collection approach by returning to a year-round data collection similar to the previous practice, but this time on *mandatory* terms. Possibly, such change can provide a more accurate and nuanced picture of the violence experienced by women in shelters.

Part II: Information on the implementation of selected provisions in priority areas in the field of prevention, protection and prosecution

Article 12 and 14: General obligations and education

Background

Gender equality is a highly recognised value in Denmark; some would even argue that the value of gender equality can be taken for granted. Gender and gender equality issues are, in contrast to the legislation in other Nordic countries, barely mentioned in the preschool legislation.¹² Neither are issues concerning gender stereotypes and prejudices, all though age 3-6 is central for constituting gender consciousness. There is little political attention to the field.

Likewise, comprehensive sex and gender education plays a key role in teaching young people about non-stereotyped gender roles, consent, mutual respect, the right to personal integrity, and in preventing sexual violence. However, according to survey results from the Danish

¹² The Day Care Act (Act no. 985 of 27 June 2022).

Crime Preventive Council, prepared by Aarhus University,¹³ strongly stereotyped and erroneous notions about rape abound among young people, especially 16-20-year-old men. This is a problem, as rape myths can increase the risk of abuse. The Crime Prevention Council has recommended following good experiences from abroad, especially concerning prevention¹⁴. With the 2021 amendment of Section 216 in the Danish Criminal Code, which changed the legislation on rape to be consent-based, there is – according to sex educators – a need for young people’s knowledge and understanding of rape and consent to be strengthened.

Challenges

Gender and gender equality are almost absent in the preschool legislation. The education of nursery teachers has an obligatory teaching module on gender, sexuality and diversity, however, in practice preschools often do not relate to gender and gender equality. Children are in their development engaged in the reproduction of intelligible and stereotypical gender norms as well as – given the possibility – more creative or varied ways of doing or performing gender.¹⁵ Normative understandings of gender influence the children’s possibilities for positioning themselves and others in their play. A recent Danish PhD thesis shows that children are often met with rather gender-stereotypical views and practices by the preschool staff, who often do not have a professional education and has to care for too many children in one group.¹⁶ Moreover, the research shows that gender performances that do not live up to intelligible ways of performing gender can have social consequences for the individual child.¹⁷

While sex education is technically mandatory in Danish schools, it is not prioritized sufficiently. Compared to other subjects, it is not specified how many lessons students should receive, and most teachers teaching the subject are not qualified. It is a significant step forward that sex education is now mandatory in upper secondary education (since 2023). However, the content of sex education and number of lessons students need have not been specified. Furthermore, it has not yet been decided if sex education should be mandatory in *other* relevant parts of the education system, i.e. vocational schools.

Recommendations

1. Denmark should establish practical experiments and research-based interdisciplinary knowledge about strategies on prevention of domestic and gender-based violence and the effect of various possible primary prevention efforts at daycare, preschool and school age.

¹³ Sarah van Mastrigt & Terese Hartmann, [Unges stereotype holdninger til voldtægt](#), Det Kriminalpræventive Råd, 2021.

¹⁴ Ibid.

¹⁵ Ibid.

¹⁶ Gry Ellegaard Thorsen, [Mellem genkendelighed og forandring: En etnografisk undersøgelse af, hvordan børn konstitueres som piger og drenge i børnehaven](#), PhD thesis, Roskilde University, 2022.

¹⁷ Ibid.

2. Denmark should implement systematic primary prevention of sexual violence and intimate partner violence, with special attention to vulnerable groups.
3. Denmark should set a number of mandatory lessons in sex education in schools and upper secondary schools and strongly consider sex education to become mandatory in *other* parts of the educational system, especially in regards to youth education/post-secondary education, including vocational and other technical schools.
4. Denmark should ensure mandatory courses on gender, sexuality and diversity in education and training for teachers at all levels of education in order to provide them with the competencies to address gender stereotypes and prevent gender-based violence.

Article 15: Training of professionals

Background

An overview of the training programmes across the Danish education system shows that only a few educational programmes comprise basic and permanent modules on domestic violence/violence against women and children. The same applies to supplementary training/in-service training of established workforce. In addition, the type and extent of existing teaching modules across the subject groups vary (e.g., teaching programmes for the police, social workers, nursery and leisure-time teachers, school teachers and other social educators).

Challenges

There is a lack of trained professionals with knowledge of the character and effects of domestic and gender-based violence against women and effective response mechanisms (e.g., among social workers, schoolteachers, lawyers, health care professionals). This lack of specialised knowledge on violence and its consequences, trauma, etc., can lead to inadequate support for victims of violence and potential revictimization. Furthermore, there is a lack of knowledge among frontline staff, who may potentially encounter children and adults exposed to violence. Staff do not necessarily have the knowledge and skills to detect and deal with domestic and gender-based violence. Consequently, there is a risk that children and adults exposed to domestic violence or other forms of intimate violence go undetected and, thus, do not get the help they need. On this basis, professional upskilling and further training for this group are also necessary.

In 2022 and 2023, Lev Uden Vold increased its work on upskilling professionals based on a grant from the »SSA reserve« in order to increase basic knowledge on domestic and gender-based violence against violence, including topics of how to ask about experiences with intimate partner violence, and how to help victims of violence. However, many professionals are still in need of skills enhancement.

Recommendations

1. Denmark should include mandatory modules on gender-based violence and domestic violence in the education or continuing and further educational programmes of at least social workers, lawyers, health care professionals (including nurses, doctors, and administrative staff), police officers, educators, and schoolteachers.
2. Denmark should provide/extend grants to organisations that work to increase knowledge on violence among professionals.

Article 16: Preventive intervention and treatment programmes

Background

Within recent years, Denmark has set aside more funds to increase the capacity of treatment of perpetrators, ambulatory counselling to people exposed to domestic and gender-based violence, and training in risk assessment for public employees. Thus, there has been progress in preventive intervention and treatment programmes. However, since intervention and treatment of both perpetrators and victims are essential to prevent and stop violence, further strengthening is still needed. For example, out-patient treatment is neither nationwide nor financed on permanent a basis.

The Correctional Service has a specific approach to perpetrators convicted of sexual violence. This category of perpetrators is examined for sexual deviance, which might require various psychological, psychiatric and/or medical treatment. It is examined whether the convicted person in question benefits from the given treatment. In contrast, there is no requirement that perpetrators convicted of violence, e.g., domestic violence, receive psychological, psychiatric and/or medical treatment. For convicts who serve a prison sentence for domestic violence, when 2/3 of the sentence has been served, it is assessed whether the person in question can be released on probation. In that context, it is a set condition that the convicted has a home to be released to on probation. A perpetrator convicted of domestic violence can be released on probation to a joint home with the victim, i.e., the spouse/partner, if the latter consents.

Challenges

Established treatment programmes seem insufficiently coordinated. For example, not all victims of domestic violence taking lodging with shelters are notified when the perpetrator is released from prison, despite legal requirements of this, or from psychiatric hospitals, fails to appear in treatment programmes, or makes threats towards the woman or the shelter during meetings at the municipality office. Thus, it is challenging to ensure the security of victims of violence. As long as municipalities do not need to offer or impose treatment on perpetrators

of domestic violence, the help depends on the respective municipality's practice and cooperation with the woman in question and the NGOs in the field. Furthermore, it depends on the awareness and motivation of the perpetrator whether he or she is offered treatment. In addition, there is a lack of statistical data on how many perpetrators convicted of sexual or domestic violence are imprisoned and how many are released on parole to a joint home with the victim of the violence, i.e. the spouse/partner.

Recommendations

1. In Sweden, municipalities are obliged to offer treatment or counselling to the partner of a woman taking lodging with women's shelters. Denmark should consider introducing a similar obligation for Danish municipalities.
2. Denmark should ensure sufficient statistical data on perpetrators convicted of sexual violence and domestic violence as seen in other areas (e.g., the statistical data on people convicted of gang crime or terrorism).
3. Denmark should require perpetrators convicted of domestic violence to receive psychological, psychiatric and/or medical treatment.
4. Denmark should ensure that probation to a joint home with a victim of domestic violence (i.e., the spouse/partner) only takes place after proper investigation and risk assessment and not solely based on consent from the victim.

Article 18: General obligations

Background

By providing safety and counselling, women's shelters play a crucial role in supporting women victims of domestic violence and abuse. Shelters in Denmark are regulated by Section 109 of the Consolidation Act on Social Services («Serviceloven»). As of Fall 2023, the Section is undergoing amendments (a draft bill and a public hearing notice was sent on 6 October 2023, with a deadline for comments of 8 November 2023),¹⁸ and the current debate concerns whether Section 109 should be gender-neutral. The State's rationale behind such change is to include men's access to shelters in Denmark. In light of GREVIO's 2017 recommendations to Denmark, this gender-neutral approach is of concern.

¹⁸ Digitaliserings- og Ligestillingsministeriet, [Udkast til lov om ændring af lov om social service og forskellige andre love \(Ligestilling af krisecentertilbud til mænd\)](#), 6 October 2023.

Challenges

In relation to family law, shelters often find that women subjected to domestic violence encounter a form of re-victimization when interacting with the police and social services. As they often lack an understanding of their situation. Moreover, shelters encounter difficulties when interacting with the system, as it often fails to facilitate a beneficial cross-sectoral collaborative dynamic among various systems. This lack of effective coordination hinders the seamless exchange of information and resources between different parties, hindering the overall effectiveness of response and support mechanisms for women who are/have been taking lodging with a shelter.

The traditional feminist understanding of violence against women as a reflection of a lack of structural equality between men and women in Denmark is challenged by a perception of equality as something lacking for men within a Danish context of violence, as they cannot receive the same assistance as women. How men exposed to violence are to be secured with help corresponding to Section 109 of the Consolidation Act on Social Services is currently unclear. NGOs in the field worry to what extent an upcoming model will address the diverse gender equality challenges, e.g. whether the understanding of gender-based violence will be diluted. Similarly, it is unclear what economic and social consequences this may entail for the women's shelters. This is a challenge because if no attention is paid to the differences between genders regarding the severity, consequences and expression of violence, the expertise that shelters have developed might decrease significantly to the detriment of those at risk. Publicly, there is currently a gender-neutral discourse concerning shelter stays and the issue of domestic violence against women. However, men do not experience a physical threat to their lives at the same level as women. Women fear to a greater extent for their own – and their children's safety and lives when they leave a violent partner. Data supports this fear. In recent years, an average of approx. 12 women per year have been victims of partner killings in Denmark.¹⁹

Due to the diminishing role of women's shelters as professional entities in cases involving violence, submissions made by women's shelters to authorities are treated as one-sided submissions within the system rather than being seen as assessments on the same level as authorities.

Women who, with or without accompanying children, seek security at shelters are not protected sufficiently by the authorities, as the parental abilities of both parents are usually not investigated. Furthermore, no system or authority is in place to ensure referral to a perpetrator intervention programme for the violent part.

Even though a woman and her child(ren) live in a shelter, both parents are entitled to know the name of the school or daycare centre attended by the child. This causes challenges in maintaining the safety of the child(ren) and safeguarding them from potential additional acts of violence by the abusive parent, especially in high-risk situations. In practical terms, this

¹⁹ Danmarks Statistik, [Kriminalitetsstatistik](#), 2023.

situation sometimes forces women to remove their child(ren) from educational settings. Consequently, this may raise questions about her parenting capabilities, as she might not be fulfilling the legal obligation of providing education for the child(ren) as required by law.

Recommendations

1. Denmark should decide that the right to take lodging with a shelter for men exposed to domestic violence is specified in a separate section in the Consolidation Act on Social Services, separated from Section 110 (e.g. a new Section 109 a).
2. Denmark should provide clear shelter parameters so shelters are reserved for people at high risk of violence and in fear of safety. Thus, the wording »[...] or similar crisis [...]« should be removed from the revision of Section 109 of the Consolidation Act on Social Services.
3. Denmark should ensure that children accompanying their mothers at a women's shelter are recognised as individuals (cf. Section 109 of the Consolidation Act on Social Services) and thus offered services at the children's level. The financial situation should reflect this approach. The effort must be based on solid expertise in domestic violence cases with special knowledge of child victims' needs.
4. Denmark should provide estimates on the needs for shelter accommodation before recognising free establishment of shelters to ensure that the resources in the area are not misused on empty shelters through the right to free establishment on shelters.

Article 20: General support services

Background

The women's shelters in Denmark form a cornerstone in the support offered to victims of domestic violence. However, at the moment, women's shelters cannot meet the diverse needs for professional help and treatment that women victims of violence need, e.g., regarding legal, social, and psychological issues.

Women enrolled in shelters in Denmark are offered safety, counselling, and social support. In addition, women are offered 10 consultations with a psychologist.²⁰ However, some municipalities in Denmark are reluctant to pay for the full psychological counselling. Instead, they pay for 10 hours with a psychologist, which includes notes-taking, recordkeeping, and preparation, which results in women receiving less than 10 hours of direct counselling with a psychologist. Some shelters have employed psychologists and offer more than 10 hours if

²⁰ In accordance with Section 109 of the Consolidation Act on Social Services (Act no. 1089 of 16 August 2023).

needed. While shelters offer critical support, they may not fully address all the diverse medical or psychological needs in relation to examination and treatment that women exposed to violence may have.

Some shelters may have limitations in providing comprehensive social and legal support. Since 2017, private commercial shelters have existed, where it is possible to generate profit (29 of 83 shelters). It is described in various newspaper articles that several shelters have been established with the primary aim of generating profit for the owners of the shelters rather than utilising resources to ensure a high level of professionalism and assistance for women exposed to violence.²¹

There are only a few women's shelters with access for women with disabilities, and a lack of specialised knowledge about this group among shelter staff, which creates uncertainty about how to help this group of women, even if the shelter layout is not an issue. Furthermore, there is uncertainty about accessing specialised resources, such as assistance or disability aids. There are few inquiries from women with disabilities at shelters, all though this group experiences an increased risk of violence – especially sexual violence.²² Persons with disabilities, particularly mental and cognitive disabilities, are highly overrepresented as victims of rape and other types of sexual assault, and the risk of suffering sexual assault is even higher for persons with disabilities living in sheltered residences.²³

Few programmes offer counselling, social support, or legal support for women outside the shelters. No programmes specialised for women exposed to violence exist with medical and psychological examination and treatment. General practitioners can refer to a psychologist (twelve consultations), which implies self-payment.²⁴ Psychiatric outpatient programmes offer long-term treatment for specific diagnoses for free for all citizens. All though many women exposed to violence might need medical and psychological examination and treatment, only a few are referred to these programmes. The only right for children enrolled at a shelter is 4-10 hours with a psychologist.²⁵ Only very few programmes offer support for children outside shelters.

Challenges

There is a lack of counselling and social support for women not enrolled at a shelter (outpatient programmes). Evaluations that outpatient programmes reach a group of victims of gender-based violence that the shelters do not reach, meaning there is potential to secure help for many victims living with violence. Still, these programmes are often funded temporarily.

²¹ Weekendavisen, [En god forretning](#), 14 October 2021.

²² Emily Ledingham, Graham W. Wright & Monika Mitra, [Sexual Violence Against Women With Disabilities: Experiences With Force and Lifetime Risk](#), American Journal of Preventive Medicine, Volume 62, Issue 6, June 2022, pp. 895-902.

²³ Frederik Rom Taxhjelm & Peter Hjaltason, [Seksuelle overgreb på botilbud. Analyse af udsathed for mennesker med handicap](#), Institut for Menneskerettigheder, 2022.

²⁴ [Bekendtgørelse om psykologbehandling i praksissektoren for særligt udsatte persongrupper](#), 2023.

²⁵ In accordance with Section 109 of the Consolidation Act on Social Services (Act no. 1089 of 16 August 2023).

Accordingly, only a few options exist for women who do not need to stay at a shelter. For example, the counselling »Sig det til nogen« (Tell someone) is currently present in five cities nationwide, but the funding is uncertain. Moreover, in the capital area, the waiting time is 7 months.

There is a lack of medical and psychological screening and examination for women inside and outside shelters. There is also a lack of social and legal support in some shelters. There is a lack of social and psychological support for children who grow up in families with violence if they have not been moving to a shelter.

A taboo exists regarding violence against women with disabilities, as well as an inflexible support system often tied to the domestic situation, making it extra challenging to reach out for support for this group. Furthermore, there is a lack of data on women with disabilities exposed to violence and a lack of specialized support for this group. Recent Danish studies on people with disabilities exposed to violence do not have a specific focus on women with disabilities.²⁶

Recommendations

1. Denmark should establish (and secure permanent funding for) more qualified outpatient-counselling and support outside shelters for women exposed to violence, with professionals specialised in gender-based violence and social and legal issues. In addition, outpatient-counselling should be a right – not an option for the few – and thereby reflected in the Consolidation Act on Social Services.
2. Denmark should establish more screening, examination and treatment for all women exposed to violence with professionals specialised in the medical, psychiatric, and psychological fields.
3. Denmark should establish a high level of quality of social support in all shelters.
4. Denmark should establish social and psychological support for children outside shelters, with professionals specialised in violence.
5. Denmark should ensure research examining the needs for, and effect of, counselling, support, and treatment offered to women and children exposed to domestic violence. In addition, Denmark should ensure research examining the specific needs of women with disabilities exposed to violence.
6. Denmark should establish specialised support for women with disabilities exposed to violence.

²⁶ Ibid. See also, Tinne Steffensen & Nikolaj Nielsen, [Voldsofre med psykiske og kognitive handicap: En undersøgelse af barrierer i straffesager](#), Institut for Menneskerettigheder, 2020.

7. Denmark should make existing and new shelters and treatment facilities accessible for women with disabilities, including specialised programmes for LGBTQ+ individuals.
8. Denmark should provide sufficient numbers of shelters, which must be accessible for women victims of gender-based violence, taking into account their specific needs, including the need to avoid their relocation in the event of full occupancy of the designated shelter.
9. Denmark should take urgent measures to address the high rate of cases of sexual violence committed against women with disabilities, in particular, intellectual or psychosocial disabilities.

Article 22: Specialist support services

Shelters, legal counselling, and aftercare programmes

Background and challenges

The government and the National Association of Municipalities (KL) have set up an expert committee, which recommends introducing a tariff ceiling in areas with the self-meeting principle to a.o. shelters.²⁷ This is to ensure uniformity in prices and economic management of the shelters in Denmark. It is feared that the recommendations are based on the wish to implement cost-saving measures in the municipalities and not to improve the existing offers for women victims. The expert committee argues that the municipalities cannot manage the economy as they experience increasing costs and rate fluctuations. Therefore, the expert group recommends a fixed tariff ceiling for shelters covered by the self-meeting principle. It is feared that a tariff ceiling and alignment of the economy across shelters could worsen the quality of the offer for women, as there are variations in expenses depending on where in the country the shelter is located.

In continuation of the proposal mentioned above to place a tariff for shelter services, the expert committee also recommends reconsidering the handling of the self-meeting principle. Therefore, they submit that whether further measures should be taken on capacity management in the area should be considered. For example, they propose that parts of the responsibility for the stay be split in two, where the shelter has visitation competence in the first acute phase, after which the municipality subsequently takes over the visitation competence. It is fundamental, though, to ensure that women exposed to violence receive the right help and support that the shelters continue to be responsible for the right to visitation.

In 2019, a new draft of the official shelter declarations was developed, which was supposed to make it easier for the Agency of Family Law to make decisions based on specialist

²⁷ Ekspertudvalget på socialområdet, [Delrapport 1 - foreløbige anbefalinger til en bæredygtig faglig og økonomisk udvikling af socialområdet](#), May 2023.

knowledge of violence from the shelters. However, it varies whether the Agency of Family Law requests these declarations on its own or if shelters send them unsolicited. The declarations are essential tools to document the shelter stay. When the Agency of Family Law does not request the declarations promptly, they may receive them too late, meaning that the woman and child(ren) no longer reside in the shelter. In this way, shelter declarations are not used as intended, and this can ultimately mean that the violence against mother and child(ren) risk not being described and included in decisions at the Agency of Family Law.

According to the Parental Responsibility Act, official shelter declarations are professional declarations at the level of other professional statements, such as a statement from a psychologist. However, in practice, shelters experience that this knowledge is only sometimes used by the Agency of Family Law. The Agency of Family Law must ensure that a case is sufficiently clarified. Therefore, it is problematic when shelter declarations are not obtained in cases where a child lives in a shelter or has a mother who lives in a shelter, as this is essential documentation to ensure that the child is protected from further violence in the family.

An effective approach to cooperation between relevant stakeholders is not followed, as the role of the women's shelters as a professional entity in cases of violence is sometimes challenged. Submissions to authorities from women's shelters are sometimes regarded as an *ex parte* submission within the system, not an assessment on equal terms with authorities as it is meant to be.

Legal counselling is not always available at shelters. Lev Uden Vold's national helpline offers free legal counselling for all gender-based and domestic violence victims. Moreover, victims of violence are provided legal assistance free of charge by legal representatives during a court case on domestic violence. The legal representatives, however, often have no specialist or particular knowledge of gender-based and domestic violence and also often work both as defence lawyers for perpetrators and as legal representatives, depending on the case.

Today, there is no nationwide aftercare programme for women exposed to violence. Thus, unless a shelter offers follow-ups or other assistance, women must almost entirely regain footing on her own. All though the municipalities offer coordinated counselling at the leave of a shelter,²⁸ most shelters experience that women (with and without children) have a significant need for aftercare, e.g. psychological aftercare, network formation, support concerning authorities, individual counselling, and practical help. However, many shelters do not have the resources to offer follow-ups.

Recommendations

1. Denmark should ensure that Danish authorities, including the Agency of Family Law, acknowledge women's shelters as impartial and professional entities.

²⁸ Please refer to Section 109 (no. 7) of the Consolidation Act on Social Services.

2. Denmark should establish new procedures to acknowledge the information provided by women's shelters as unbiased documents.
3. Denmark should ensure that women's shelters are seen as impartial when filing reports, thereby acknowledging them as cooperating partners by the system.
4. Denmark should ensure that reports filed by women's shelters concerning children are acknowledged in the divorce system as expert testimony.
5. Denmark should ensure a uniform procedure for how and to what extent shelter declarations must be used.
6. Denmark should ensure that women and child(ren) countrywide are offered aftercare programmes, e.g. by putting into place a coherent and specialised aftercare treatment programme, e.g. in addition to the already existing specified in Section 109 (no. 7) of the Consolidation Act on Social Services.

Refugee women

Background

Violence is an issue for many refugee women, during their childhood, through conflicts and wars, and on the journey to Europe. Moreover, many refugee marriages are marked by different kinds of violence, as the stress and strain of the flight and the insecurity affect the whole family, and many husbands feel a loss of status and purpose.

Regarding the obligations set out in the Istanbul Convention, issues of concern are very much the same as those mentioned in the 2017 Shadow Report. Minor improvements have been made, but the core problems remain the same. Denmark has become more aware of the violence that some migrant women and girls face. However, the violence is often linked to their culture, and Denmark still has to acknowledge that, in some ways, Danish society keeps women locked in dependency on their husbands and fathers.

Challenges

On arrival, many women have been exposed to violence and abuse, often sexual, on the journey to Europe. However, no efforts are made to investigate this or offer psychological support to them. Moreover, gender-based persecution is not recognised as political or religious persecution. Women's asylum motives are often connected to their gender and violence and coercion (e.g., forced marriage, rape, female genital mutilation, and accusations of slandering the family honour). Such motives are often dismissed in the asylum process as "private conflicts", do rarely result in a refugee status, and standard questions during official interviews do not even include the issues. Lately, improvements have been made, as the Danish Refugee

Appeals Board has decided to grant convention status to all women and girls from Afghanistan and to a number of girls from Somalia due to the risk of female genital mutilation. However, further improvements are needed.

Most refugee women are still granted a weak form of protection due to general danger in their home country or as the wife or daughter to a man who was granted asylum (via family reunification). In both cases, there is a risk of losing the permit, e.g. if conditions in the home country improve even slightly or if the family life is determined for some reason. Young, single women were the first Syrians to have their protection status in Denmark revoked.

In 2017, Denmark made improvements in the legislation concerning women who divorce a violent husband, strengthening their chances of keeping their permits to stay after a divorce. However, the problem is far from solved. Many women are still forced to stay in violent or abusive marriages. The law requires that the woman can provide evidence of the violence, that the woman has made an active effort to integrate into Danish society and that the cohabitation has ended because of the violence. However, examples show that women exposed to violence still lost their permits, for example, because the husband initiated the divorce, due to lack of physical evidence despite testimonies from, e.g. social workers, because the woman left the husband many years after the police report was filed (the violence was not accepted as the reason for her leaving), or because the woman left her husband shortly after arriving to Denmark (no time to integrate). Information to the women about their rights is minimal, resulting in many husbands threatening their wives that they will lose the children if they do not accept the situation. Nevertheless, they often choose to stay even if they get the complete information, as the alternative is even worse. In addition, economic violence is an overlooked issue. As the husband is usually the breadwinner in families with ethnic minority backgrounds, the woman depends on her husband's income. Some men will take advantage of the situation, and their wives will be less likely to leave despite the violence as they have no savings or income. Danish social workers will always urge a woman to divorce a violent husband, but the consequences can be very harmful for the woman. The woman might risk losing her permit to stay in Denmark, and returning to her home country as a divorced single woman might lead to eviction from her own family, and in any case a tough economic situation. Also, in some Muslim countries, the civil Danish divorce is not even recognized legally.

Women's chances of obtaining a permanent residence permit or Danish citizenship are far smaller than men's, as women generally have a more challenging time meeting the criteria of fluent Danish language and a full-time job for years. A period in a shelter will often mean that a woman has to get public allowances, which hinders being granted a permanent stay. This keeps women in a vulnerable position where they depend on their husband, no matter how he treats them.

Women in Danish asylum centres feel unsafe, and rape or abuse is not always reported. All asylum centres and deportation centres are sex mixed, and only a few have closed corridors for women only. In 5 centres, many women expressed concerns about being one of the few women among a majority of men in the centres. They also told of many incidences that had never been reported to the staff or the police, and some felt it could even make things worse

if they reported it. The centres are placed in remote areas with difficult access and limited staff, and some have no staff at night, all of which make women feel very insecure and often force them not to leave their rooms.

Recommendations

1. Denmark should ensure that all gender-related issues come forward during the asylum process and that vulnerable women get extra support. Also, Denmark should ensure that gender aspects of asylum claims are recognised to a higher degree and that vulnerable women are not first in line to lose their permits.
2. Denmark should ensure that no woman needs to stay with a violent partner out of fear of losing her right to stay in Denmark. Proof of injury or police reports should not be required, as this is often impossible, especially for sexual or psychological violence.
3. Denmark should provide easier access to safe journeys such as humanitarian visas and family reunification to avoid the dangerous routes. Moreover, Denmark should provide mandatory screening upon arrival with a psychologist to identify victims of violence, e.g. by establishing a centre for women only (with or without children) and a standing offer that all women can move there anytime they wish.

Economic violence

Background

So far, economic violence has not been distinctly mentioned or criminalised in the Danish Criminal Code. However, some forms of economic violence are covered by the acts of psychological violence criminalised in Section 243 of the Criminal Code. Generally, economic violence is still an overlooked and under-communicated form of partner violence.²⁹

Challenges

Regarding economic violence, Denmark's legal system seems incompatible with the phenomena. Generally, economic violence is not recognised as part of psychological violence. Examples show that the police often fail to identify the phenomena, pay little attention to the matter, or find it challenging to satisfy the burden of proof. Thus, victims of economic violence do not obtain financial restitution, and there is a risk that perpetrators will go unpunished.³⁰

²⁹ Birgitte Arent Eiriksson, Malte Kolze & Anders Mihle, [Retsstilling for ofre for økonomisk vold](#), Justitia, 2023.

³⁰ Ibid.

There is a lack of attention to the victims' need for economic recovery in the legal system, which primarily focuses on the perpetrator's punishment. This leaves the victims with financial consequences, a sense of helplessness, and no public acknowledgement of the crime in question.³¹

Recommendations

1. Denmark should ensure uniform knowledge of psychological violence, and in particular economic violence, across the police force and in the legal system. Generally, knowledge about economic violence should be increased across authorities and professional groups.
2. Denmark should prioritise the investigation of economic violence as a *part of* psychological violence and grant victims of economic violence access to a legal representative.
3. Denmark should establish social and legal support for victims in need of economic recovery.

Cyberviolence

Background

New technology and online features have given perpetrators new ways to harm and control victims. Perpetrators try to obtain information about the victim through tracking, such as GPS trackers, Apple IDs, iCloud, social media, email, and users on public platforms. Cyberviolence also includes sharing intimate photos or videos of the victim online without consent. These photos and videos may originate from the victim being recorded in a sexual situation without their knowledge, or they may be fabricated (deep fake). Cyberviolence can also involve spreading malicious rumours and creating fake profiles on escort/sex dating sites to make it appear that she is selling sexual services.

Abuse in the digital sphere can have similar consequences as abuse in the physical sphere. Reactions may include anxiety, PTSD, sleep problems, difficulty concentrating, self-isolation, and loss of self-confidence. Many victims struggle with overwhelming feelings of shame and trauma following online exposure. In several European countries, victims of digital image-based abuse have committed suicide. Digital violations have concrete material and social consequences, as they can go beyond the victims' reputations and thus damage their job opportunities and reputation in the workplace. It may cause economic problems due to sick leave and unemployment.

In 2022, Danish NGOs and scholars agreed on a definition of cyberviolence. This definition, presented to the Minister of Justice, defines cyberviolence as "digital actions intended to harm a person psychologically or infringe upon their privacy through demeaning, harassing,

³¹ Ibid.

or offensive behaviour”. A ‘digital act’ refers to an act carried out using digital media or technology such as a computer, tablet, GPS, or phone. ‘Privacy’ is understood in accordance with the concept of ‘family and private life’ defined in Article 8 of the European Convention on Human Rights. Consequently, privacy also encompasses a person’s reputation and professional life.³²

It constitutes a significant improvement that Denmark adopted amendments to the Criminal Code and the Code of Criminal Procedure last year to enhance the protection of victims of cyberviolence. The amendment, among other things, entailed equalising offences that occur digitally with offences that occur in the physical realm and the independent criminalisation of grooming of children.

Challenges

Violence against women facilitated by digital devices and services is a growing problem in Denmark. The number of women exposed to cyberviolence remains uncertain, primarily due to insufficiently detailed and precise questions about digital violence in official surveys, diverse definitions of digital violence, and underreporting of incidents of cyberviolence.

A representative study has shown that one in five Danish women experience harassment online.³³ A survey on digital violations at shelters shows that 4 out of 10 shelters have had women in their shelters who have experienced having intimate images shared without consent. 3 out of 4 shelters have had women who have been tracked via their phone, and more than half have had women who have been tracked via GPS.³⁴

In the political agreement »Initiatives against digital violations«, cyberviolence is defined as a phenomenon that primarily affects children and youth.³⁵ However, it also significantly impacts adults (18+). Organisations that offer counselling for people above 18 years are under-prioritised and under-funded in Denmark.

The police unit specialised in digital sexualised crimes (NC3) has described the rise in reports on digital sexualised crime as “explosive”.³⁶ From 2019 to 2020, a 48% increase in the number of reports of sextortion was discovered.³⁷ The most recent political agreements on the work of the police have emphasised the need for a prioritised effort against cybercrime, including cyberviolence and non-consensual sharing of intimate material. However, the proportion of cases investigated by NC3 has decreased from 2019 to 2022. In 2022, NC3 conducted initial

³² Digitalt Ansvar, [Forståelsespapir. Digital vold](#), 2022.

³³ Amnesty International, [En ud af fem danske kvinder oplever chikane på nettet](#), 20 November 2017.

³⁴ DR, [Digitale krænkelse på krisecentre: Vrede mænd sporer eks-konen med gps](#), 3 April 2018.

³⁵ Regeringen, [Initiativer mod digitale krænkelse](#), 29 June 2022.

³⁶ DR, [Kunstig intelligens klæder danske kvinder af på nettet: 'Det er jo alt, der bliver blottet på én'](#), 11 April 2021.

³⁷ Berlingske, [Kriminelle afpresser ofre for seksuelle billeder eller penge: »Internettet åbner op for alle mulige nye former for kriminalitet](#), 21 March 2021.

investigations in only 15% of grooming and sextortion cases and approx. 6% of digital sexual abuse cases.³⁸

In helplines offering counselling to people above the age of 18, it is the experience that citizens struggle to get illegal content removed online. When citizens report content using the platforms user reporting mechanisms, they sometimes never receive a reply, they often have to wait very long, and sometimes the result is incorrect. It is incredibly difficult for ordinary citizens to get in touch with the larger platforms that receive tons of reviews. In some cases, platforms have avoided removing content or even helped spread awareness of the illegal content through push messages.³⁹

It is a challenge that the technological possibilities that artificial intelligence creates. Image generation tools can be used to create artificially compromising material and realistic fake identities. Voice tools can be employed for identity theft, and with advanced chatbots like ChatGPT, it has become easier to generate effective threat emails and libel. These tools can be used for harassment, sextortion, and illegal coercion.

From 2016 to 2022, the number of victims in cases of illegal coercion in Denmark increased by 200%. Reports of usury and extortion for money predominantly involve male victims, while cases of illegal coercion have a higher proportion of female victims.⁴⁰

Recommendations

1. Denmark should set aside funds for helplines for people above the age of 18 exposed to involuntary image sharing or other transgressive behaviour online.
2. Denmark should ensure that the police prioritise efforts against cybercrime, including cyberviolence and non-consensual intimate image sharing, e.g. by reevaluating current allocations.
3. Denmark should ensure that cyberviolence is included in the CVS.
4. Denmark should ensure that shelter staff receive proper training in protection against digital violence, e.g. by developing a national procedure on how to detect and stop digital stalking, digital harassment, etc.
5. Denmark should explore the possibility of introducing a national precautionary principle until the EU's AI regulation is implemented. This requires clear labelling of AI-generated

³⁸ Statsrevisorerne, [Rigsrevisionens beretning afgivet til Folketinget med Statsrevisorernes bemærkninger. Politiets efterforskning af digitale seksualforbrydelser og økonomisk it-kriminalitet](#), 2023.

³⁹ DR, [Stort socialt medie udbredte kendskab til krænkende foto af Lærke Bodilsen: 'Det er jo fuldstændig sindsygt'](#), 14 March 2021.

⁴⁰ Anne Tscherning Larsen, Ask Hesby Krogh, Asta Iris Rohde, Mie Oehlenschläger & Nell Rasmussen, [Digital vold i Danmark. Anden del: Nye former for afpresning](#), Digitalt Ansvar, 2023.

audio and visual content and enabling of the police to block websites, apps, and services specifically used for committing cyberviolence.

6. Denmark should assess the possibility of strengthening efforts against digital extortion, protecting victims' privacy, and preventing perpetrators from hiding behind anonymity.

Support for children

Background

Statistical data indicate that 93% of children accompanying their mothers to a women's shelter have been exposed to violence or witnessed violence against their mothers and/or siblings.⁴¹ The violence children are exposed to – directly or indirectly – is profoundly harmful and requires social work efforts from specially trained staff. Thus, authorities must be able to uncover instances of violence and promptly initiate appropriate measures.

Challenges

If a child does not show what authorities see as “clear signs of dysfunction” or there is no concrete evidence of violence, little effort is often made for children lodging with shelters (except for 10 hours of psychological help).

In some municipalities, immediate response to violence against children is not always made unless physical violence is visible/proven. Generally, the children's perspective is under-prioritised in case handling of domestic violence, and it is usually adults who describe the child and its experiences. In general, there is a lack of knowledge about how the system can pay better attention to the children's inquiries and perspectives.

Recommendations

1. Denmark should ensure that the authorities, as a precautionary principle, assume that children carried along to shelters by one of their parents have been exposed to or witnessed violence.
2. Denmark should ensure that children's perspectives are included in case proceedings to a greater extent and that the municipalities give urgent responses to children seeking help at a shelter (with their mothers).

⁴¹ Ida Karlsson, [Årsstatistik 2019. Kvinder og børn på kvindekrisecenter](#), LOKK, 2019.

3. Denmark should scrutinise the authorities' process of examining parents when a child is taking lodging at a shelter, especially what steps are made before contact and visitation are guaranteed between a child and an alleged violent or neglecting parent.

Article 25: Support to victims of sexual violence

Background

Across Denmark, nine centres are located within hospitals, offering free 24-hour services to individuals who have experienced rape or sexual assault. The centres have existed for more than 20 years and provide specialised assistance, including (forensic) examinations, medical treatment, and psychotherapy. Most centres also offer social and sexual counselling for the victims and counselling for relatives. This specialised help is available regardless of whether the rape or sexual assault has been reported to the police. In cases where the incident is reported, a forensic examination is conducted at the centre at the request of the police. If not reported, a forensic examination with trace collection is offered, and the evidence is retained for three months to one year, should the victim choose to report to the police later. Psychotherapy is offered at all centres after an individual assessment, usually ranging from 5 to 10 sessions (short-term treatment).

Since 2014, the centres have been able to provide counselling and psychotherapy to victims who have been raped or sexually assaulted more than one month prior to seeking help. In some centres, the high influx of victims who contact the centres has led to a waiting period for psychotherapy services of up to one year. If the rape or assault has occurred within a year, the victim can obtain a referral from a general practitioner to 12 sessions with a psychologist in private practice (the Region covers 60 % of the cost, while the victim must pay the rest). However, the waiting time for psychological assistance is often long.

Besides the nine rape centres, three regional independent support centres for adult victims of sexual violence in their youth or childhood are financed by public funds.

Challenges

The centres for victims of rape and sexual assault are situated within hospitals across different regions and departments, leading to variations in resources and organisation, particularly in psychosocial support. Despite the increasing number of victims seeking help each year, resource allocation has not kept pace. In certain instances, supplementary resources have been allocated from the national reserve for social, health, and labour market initiatives, primarily aimed at minimising waiting times for psychotherapy services.

The centres have written two open letters to the Ministry of Health and Danish Regions in June 2022 and May 2023, highlighting the problem of a rising number of victims and a lack of psychotherapy resources. The letters also raised concerns about unstable budgeting. These

challenges impact personnel retention, waiting times and the availability of long-term and sufficient psychotherapy. Additionally, some centres are not able to offer social and sexual counselling for victims and counselling for relatives.

Many victims have complex needs that exceed the centres' capacity, leading to referrals for treatment elsewhere due to limited resources at the centres. This includes victims with severe psychiatric needs, victims in abusive relationships, with addictions, etc. A forthcoming research project from the University of Southern Denmark will delve into this issue since very little is known about the repercussions for these victims.⁴² Moreover, victims in abusive relationships often have limited treatment alternatives unless they reside in a shelter.

Rape and sexual assault victims face a heightened risk of developing PTSD,⁴³ emphasising the importance of ensuring that the healthcare system can provide relevant treatment. Presently, many victims are caught in the gap between two systems, as the centres are struggling to address the diverse needs of the victims, and the psychiatric system is constrained by treatment packages.⁴⁴ Treatment packages restrict treatment to addressing one disorder or diagnosis at a time. However, many individuals who have experienced violence and sexual assault often exhibit numerous severe symptoms that may not align with the criteria necessary for a specific diagnosis – which is a prerequisite for receiving treatment within the psychiatric system.

Compounding this issue is that while sexual victimization is a risk factor for developing mental health issues, concurrently, mental health challenges amplify the vulnerability to sexual assault.⁴⁵ Therefore, it is imperative that psychiatric treatment is accessible to victims of rape and sexual assault and that such treatment is custom-tailored to suit their specific needs.

Catering to the diverse needs of the heterogeneous group of rape and sexual assault victims remains exceedingly challenging within the framework of the current healthcare system.

Lastly, the variations in resources and organisational structures in the centres pose challenges to conducting research. Obtaining comprehensive data in this area is a complex task, which is evident in the Danish State Report and its response to GREVIO's question no. 29. The response focuses on incidents of violence in general rather than specifically addressing sexual violence. Since not all centres have the capacity to prepare an annual report, it is difficult to obtain data from across the country.

Adequate and easily accessible trauma support for victims of sexual violence is generally not the experience for women with late effects of sexual violence.

⁴² See an introduction of the project in Danish at: https://www.sdu.dk/da/om_sdu/fakulteterne/sundhedsvidenskab/nyheder/hvem-faar-hjaelp-efter-voldtaegt.

⁴³ Jitender Sareen, [Posttraumatic Stress Disorder in Adults: Impact, Comorbidity, Risk Factors, and Treatment](#), *Canadian Journal of Psychiatry*, 2014, Volume 59, Issue 9, pp. 460-467.

⁴⁴ For further information please see: <https://www.psykiatri-regionh.dk/vejledning-og-rettigheder/rettigheder/behandlingspakker/Sider/default.aspx>.

⁴⁵ Barbara Krahe & Anja Berger, [Longitudinal pathways of sexual victimization, sexual self-esteem, and depression in women and men](#), *Psychological Trauma: Theory, Research, Practice, and Policy*, 2017, Volume 9, Issue 2, pp. 147-155.

In 2021, Joan-Søstrene (the Joan Sisters) did a survey, which disclosed that women in need of trauma support from the rape centres due to the late effects of sexual violence, in general, had to wait up to 10 months or even 2.5 years for trauma support, depending on geographic location.

For several reasons, access to adequate and accessible support is critical for women who have experienced sexual violence in childhood. For example, women who have survived sexual violence are at higher risk of further violence than the general female population.

Recommendations

1. There is a need for a sustained increase in resources for the centres for victims of rape and sexual assault as well as for greater standardisation of services at the centres across the country.
2. The healthcare system should ensure better collaborations between various parts of the health sectors regarding victims with complex needs, e.g. psychiatric services.
3. Economic support should be ensured for victims of rape and sexual assault, e.g. for extended psychological treatment.
4. Centres for victims of rape and sexual assault should offer quick, preliminary legal advice.
5. Municipal social authorities should regularly be trained in their obligations regarding preparedness concerning sexual abuse of children and youth and their possibilities of seeking assistance in case handling.
6. Conditions for research in the centres for victims of rape and sexual assaults on a.o. their psychological needs should be improved.
7. Financial resources should be allocated to ensure that the rape centres can provide appropriate, easily accessible trauma support for victims with late effects from sexual violence.
8. Financial resources should be allocated to ensure that the regional support centres for adult victims of sexual violence meet the professional statement of need.

Article 31: Custody, visitation rights and safety

Background

The existing family law system strongly encourages parents to enter into joint agreements in the best interests of their children. The principle that parents can enter into settlements and joint agreements is usually unsuitable for families where there is violence. In a relationship with violence, there will automatically be an imbalance in the power relationship, which means that it can be challenging to negotiate, for example, visitation rights.

Challenges

In cases involving violence, victims of violence must have the opportunity to appear alone in meetings with the authorities concerning residence of children, visitation rights, etc. However, the Agency of Family Law does not consistently offer such separate meetings. Moreover, shelters experience that women victims of domestic violence often choose to enter agreements with their violent ex-partners, as they wish to avoid being perceived by the Agency of Family Law as “uncooperative” or “harassing”. This even applies to situations where the women consider the agreements unsafe for their child(ren) and/or themselves.

Theoretically, the Agency of Family Law has sufficient legislative frameworks and guidelines. In practice, however, examples show that the Agency of Family Law needs to utilise the opportunities available better to ensure the best process. For example, child expert investigations are used to a lesser extent, and the possibility of collaborating with the municipalities is not used to an extensive degree. The Agency of Family Law must investigate the cases thoroughly, especially in cases of violence or suspicion of violence, which the Agency of Family Law often does to a far lesser extent than the law prescribes. Furthermore, the family law system differentiates between simple cases (§ 5), less simple cases (§ 6), and complicated cases (§ 7). Cases involving domestic violence and abuse are often categorised under the latter and marked as “high conflict” cases, thus commonly assessed as a mutual conflict between the victim/survivor and the perpetrator. This results in a lack of protection for victims/survivors.

Supervised visitations in the Agency of Family Law often create significant challenges for the women exposed to violence. In many cases, it is an expectation that the women will participate actively in the visitation, e.g. by accompanying the child to and from the visitation, and sometimes even as a participant, creating safety for the child. Often, the Agency of Family Law reassure the women that they can avoid meeting their ex-partners in connection with the supervised visits; however, the Agency often cannot meet the assurance why the women involuntarily meet their perpetrators. Such situations can cause psychological difficulties and consequences, ultimately negatively affecting the woman and/or child. In addition, interaction with the perpetrator during supervised visitation is often unavoidable, typically due to practical reasons (e.g. not various exits or accessible back doors, and no staff to accompany the women out such back doors). These situations create a concern that the perpetrator can identify, for example, the woman’s and the child’s home address or other safety measures

put in place. Overall, no sufficient account is taken of whether exercising visitation rights or parental authority poses a risk concerning the rights and security of the victim or the child(ren).

In addition, it should be noted that the Agency of Family Law has significant challenges in complying with private data security for women and children exposed to violence and that there are often data breaches, e.g. examples of the disclosing of home addresses of women and children, even though the information is protected, or the victim/survivor stays at a shelter. This creates great insecurity and can be decidedly dangerous for the woman and the child. For further information on this matter, please see the comments on Article 56 on measures of protection.

Recommendations

1. Denmark should reevaluate the current approach at the Agency of Family Law that relies on parents reaching agreements solely based on the best interests of their child(ren). Generally, Denmark should recognise that this approach is ill-suited for relationships marked by violence.
2. Denmark should develop guidelines for the Agency of Family Law that specifically address family cases involving violence, considering the dynamics of power imbalance and trauma. This will ensure that negotiation and agreement processes are fair and protective for all parties involved.
3. Denmark should establish a standard practice for the Agency of Family Law, offering separate meetings for victims of domestic violence, ensuring their safety and comfort throughout the process.
4. Denmark should strengthen the Agency of Family Law's capacity to effectively utilise its granted powers and ensure the consistent application of its legislative framework.
5. Denmark should establish regular training and professional development mechanisms to enhance the Agency of Family Law's understanding of the complexities surrounding violence within family law.
6. Denmark should prioritise the well-being and safety of victims of violence and their children during supervised visitations, thus providing necessary support to address potential risks.
7. Denmark should take the necessary measures to recognise better that children witnessing one parent's abuse of another parent/other siblings are as affected as if they had been the target of the violence themselves.

Article 48: Prohibition of mandatory alternative dispute resolution processes or sentencing

Background

Danish law has no provisions on mandatory alternative conflict resolution in connection with a criminal offence. Article 2 of the Danish Act on Conflict Councils in Connection with a Criminal offense (Act no. 467 of 12 June 2009) prescribes that mediation in conflict councils can only occur if both parties (victim and perpetrator) consent to participate. It follows that both parties may withdraw their consent at any time. The provision further prescribes that mediation in conflict councils can only occur if the perpetrator has essentially confessed to the criminal act, indicating the will to take responsibility for his or her actions. Article 4 of the Act prescribes that the conflict resolution process only supplements the usual criminal case processing and cannot substitute punishment or other legal consequences of the criminal act.

Challenges

The Danish National Coordinator for Conflict Counselling and Victim Counselling has stated that in Denmark, conflict counselling is carried out in domestic violence cases. Conflict councils have also been carried out in a few cases of killings in close relationships (presumably with the closest relatives). In the visitation process, which is carried out by the police before holding conflict councils, it is very carefully assessed whether the case is suitable for conflict councils, including whether the parties are motivated to participate. The National Coordinator has informed us that there are no precise figures for how often conflict councils have been carried out in this type of case. However, it is assumed that in recent years, this has been the case between 10 and 26 times, corresponding to between 2.5 and 5% of the total number of completed conflict councils nationwide. GREVIO did not place any comments on article 48 concerning conflict councils in the 2017 (Baseline) Evaluation Report on Denmark.

Recommendation

Denmark should conduct an overview of the cases on domestic violence and killings in close relationships where conflict counselling has been carried out.

Articles 49 and 50: General obligations and immediate response, prevention and protection

Background

As of 2021, all police districts in Denmark have interdisciplinary teams for cases relating to domestic physical and psychological violence, rape, stalking and honour-related crimes. In each police district, the specialised team consists of three civilians (so-called key persons) with

various analytical and social work educations. The specialised teams hold several functions in case handling, cooperation with other authorities, and education of police and frontline staff of other authorities on the above-mentioned complex crimes.

The specialised teams constitute a great resource and improvement of the police's understanding of and competence in handling complex cases of gender-based violence and rape, stalking and honour-related crime. In addition, the teams can present innovative and knowledge-based approaches to handling cases, etc. Thus, the Observatory welcomes the specialised teams in the police force.

Challenges

Many work assignments and expectations are placed on the specialised teams in each police district. The police director of the given police district employs the key persons for the specialised team. There are no formal, national guidelines for the teams' work, so the teams' assignments differ from district to district. In many police districts, the respective teams have made positive initiatives for victims of gender-based violence. However, the lack of national guidelines leaves victims (and perpetrators) with different case handling and investigation depending on the police district. This does not contribute to a uniform treatment of victims (and perpetrators) on a country-wide level.

Furthermore, the recent criminalisation of psychological violence and stalking, as well as other factors related to interpersonal violence, has led to a considerable rise in the number of police reports of often complex cases. This, however, has not caused further allocation of financial and personnel resources to the police, which may hamper the specialised teams in meeting the great expectations placed on their work.

Also, the lack of national guidelines makes evaluating the specialised teams' contribution to the police handling of gender-based violence cases difficult, if not impossible, as there is no common framework to measure against.

Recommendations

1. Denmark should institute national guidelines and a common structural framework for the specialised teams in the police district, defining their common work assignments and obligations. This would uniform the teams' contribution to police handling cases on domestic physical and psychological violence, rape, stalking and honour-related crime. The guidelines should also cover police participation in intersectoral cooperation, such as with social welfare and health authorities and specialised NGOs.
2. Presently, the specialised teams consist of only three key persons in each police district. Given the teams' extensive and diverse workload and difficulties meeting the needs of the police, Denmark should ensure a greater personnel capacity for each specialised team.

Article 51: Risk assessment and risk management

Background

For several years, the police in Denmark have used well-known, evidence-based risk assessment tools (SARA-SV, SAM and PATRIARK). The Danish National Police has published guidelines stipulating in which cases the use of risk assessment is mandatory and in which it is recommended. Risk assessment is mandatory in all cases of severe physical and psychological violence and death threats, persistent harassment and coercion and/or captivity. Risk assessment is recommended when the perpetrator has a severe mental disorder and when there is an ongoing case related to visitation rights or custody of children. Each police district has certified staff to carry out the assessments.

Challenges

Risk assessments are meant for severe cases of violence and threats, which rely on a discretionary assessment of the situation. The risk assessments are developed on tools based initially on Swedish data, which are not directly transferable to Danish data. This makes the risk assessment challenging and leads to varying and uncertain use in the respective police districts, and to varying safety throughout the country for victims of violence and potential killings. It is also well-established knowledge in relation to risk assessments that it takes a long time before the use of the tool becomes routine and uniform.

Furthermore, when conducting risk assessments, the police most often rely on police data and do not cooperate with other authorities, e.g. the social welfare and health authorities or specialised NGOs. No formalised cooperation model exists where the police and other relevant actors coordinate the use of risk assessment tools. Consequently, there is variation across police districts. As the police generally are the last authority to meet victims of gender-based violence and death threats, other authorities may have important indications or suspicions of violence important for a risk assessment and, thus, for the victim's safety.

In addition, the lack of formal cooperation between the police and the social welfare authorities reflects the risk. The police can provide security in acute situations and through means such as restraining orders. However, the victim's long-term safety is equally dependent upon social aftercare and support, which make cooperation essential.

Recommendations

1. Denmark should limit the discretion in the national police guidelines of deciding "severe" as to the use of risk assessment in cases of violence. Risk assessment should always be used when a death threat is reported.
2. Denmark should establish a formalised, uniform cooperation model where the police and other relevant actors (e.g., social and health authorities and specialised NGOs) cooperate

and coordinate the use of risk assessment tools. The model should be used country-wide within a clear organisational structure, and it should be ensured that all cooperating parties are equally educated, cooperating on and using the risk assessment.

3. Denmark should develop and implement intersectoral cooperation and structures for authorities' risk management to guarantee the safety of victims of gender-based violence and potential victims of killing.

Specific comments on gender-based killings of women

Background

Recently, Danish authorities have strengthened the monitoring of homicides. However, no systematic data collection on gender-based killings of women and/or killings of women in close relations has been made by the authorities. The monitoring has not aimed at providing data on patterns and qualitative knowledge of killings of women. Moreover, the monitoring has not been organised to provide systematic data and knowledge on the institutional response across authorities to prevent such killings in the future.

Recent research provided an overall picture of killings in Denmark, including gender-based killings within a time range of 25 years. Also, the Danish newspaper Politiken has voluntarily and with a monitoring perspective undertaken the task of collecting media data on killings of women for a 10-year period.⁴⁶

Challenges

The new monitoring initiatives on killings represent a significant improvement in data collection on homicides in Denmark. The monitoring will include data on, for example, the gender of the victims and the perpetrators. Also, the newly established mandatory, systematic case evaluation of homicides in the police districts will provide essential new knowledge for the police, strengthening their investigation of all incidents of gender-based violence, stalking and killings.

However, monitoring gender-based killings requires research to detect the perpetrator's background, behaviour patterns and relations between partners before the killing to serve a preventive perspective. Furthermore, the monitoring needs to research inter-sectoral cooperation across the relevant authorities, which may be involved with the parties, to identify

⁴⁶ During the 25 years (1992-2016), 1.427 killings were registered in Denmark. 38% (536) of the killings were of women. Men committed 95% of the killings of women. 15% of all killings during 2016-2021 were partner killings of women, making it the most common killing of women in Denmark. For further details please see Asser Hedegaard Thomsen, [Homicides in Denmark 1992-2016](#), PhD thesis, Aarhus University, 2020. See also, Line Vaaben & Asser Hedegaard Thomsen, [En forudsigelig forbrydelse: kvindedrab i Danmark](#), 28B, 2022.

possible systemic gaps in the institutional response to the potentially dangerous situation of the parties.

Recommendations

1. Denmark should establish an independent monitoring commission (or committee) of experts on gender-based killings under the Ministry of Justice for not less than five years.⁴⁷
2. Denmark should ensure that such a commission is mandated to collect data from all relevant sources to analyse the parties' background, patterns, and relations in cases leading to gender-based and partner killings. Also, Denmark should ensure a mandate for the commission to research the intersectoral cooperation of authorities in gender-based and partner killing cases. This should contribute to identifying possible systemic gaps in the institutional response of the authorities to indications or suspicions of such violence and risk of killings. The commission should conclude its work with concrete recommendations on how to prevent future gender-based and partner killings.

Article 52: Emergency and barring orders

Background

Since 2004, the Danish police force has been entitled to expel a threatening or violent part from the household (for 14 days at a time) in response to severe intimate partner violence or as a preliminary measure. However, evaluations from 2006 and 2009 show little use of emergency barring orders by the police. Moreover, GREVIO's 2017 (Baseline) Evaluation Report on Denmark (paras 204-210), still give a true and fair view of the situation in Denmark.

One initiative aims to allow for immediate protection of a victim of stalking and harassment by introducing a temporary restraining order which can be applied while a case regarding a restraining order or exclusion order is being processed. To this effect, the Restraining Order Act was amended in December 2016.

Challenges

On the face of it, GREVIO's recommendations to Denmark on emergency barring orders have not resulted in changes in the use of emergency barring orders by the police. According to a statement of May 2020 from the Minister of Justice to the Parliament, at the national level, the police have only issued between 2 and 8 expulsions in total per year during the years 2015-2020. One of the reasons given by the police for not using barring orders is the lack of adequate places for the barred individuals to stay when receiving a barring order. It is the

⁴⁷ As a reference, please see information on the Norwegian [Partnerdrapskommisjon](#) (commission on partner killings).

responsibility of the individuals to secure private housing, e.g. with family members, or they can take lodging in hostels, often together with people with substance abuse and psychic problems.

Recommendations

1. Denmark should step up the efforts to implement the full range of emergency barring and protection orders available under the Act on Restraining Orders and ensure their vigilant enforcement, as also recommended by GREVIO in the past.
2. Denmark should launch a public information campaign about the full range of emergency barring and protection orders available under the Act on Restraining Orders.

Article 53: Restraining or protection orders

Background

Restraining and protection orders, including immediate restraining orders, supported by various technical protection precautions, are measures the police can use to protect victims of gender-based violence, stalking and death threats. Overall, the Act on Restraining Orders is aligned with Article 53 of the Istanbul Convention.

Challenges

Unfortunately, the police only make limited use of the full range of entitlements under the Act on Restraining Orders, especially immediate restraining orders, and the practice varies among police districts. An immediate restraining order is usually the most acutely needed protection of the victim. In 8 out of 12 police districts, immediate restraining orders were not issued in 2021 and 2022. According to a response from the Minister of Justice to a member of the Parliament in February 2023, at the national level, the police only issued 13 immediate restraining orders in 2021 and 24 in 2022.⁴⁸

Also, an inventory by the Head of the Prosecution Services on violations of restraining orders from 2017-2022 showed that violations had skyrocketed from 2.976 cases to 7.296 cases. Most of the violations (5.587) were committed by a tiny group of men (13), though, on average, 430 violations per man.⁴⁹

Violations of restraining orders have had serious and fatal consequences. The violations reflect partly penalties with low deteriorating effect on perpetrators, slow case handling of restriction orders, partly low priority in police in arresting the persistent violators.

⁴⁸ Justitsministeriet, [Besvarelse af spørgsmål nr. 121 \(Alm. del\) fra Folketingets Retsudvalg](#), 15 February, 2023.

⁴⁹ TV2, [Antallet af brud på tilhold er på himmelflugt – ”opsigtsvækkende”, mener kriminolog](#), 4 February 2023.

Recommendations

1. Denmark should ensure the intended use of immediate restraining orders by the police countrywide.
2. Denmark should ensure police priority in issuing restraining orders, fast case handling and appropriate follow-up to avoid violations and to protect victims.
3. Denmark should take steps to deter perpetrators to stop restraining order violations and introduce new technical and digital surveillance measures, such as anklets.

Article 56: Measures of protection

Background

Besides the protection measures for aggrieved parties set out in the Administration of Justice Act (as mentioned in Danish State Report to GREVIO), measures on notification of leave of absence and release of offenders of violence and sexual assaults have been introduced within recent years. In addition, new legislation on release on parole for perpetrators of domestic violence and partner killings is mentioned in the recent Action Plan, which should be seen as strengthening measures of protection.

Challenges

There is little knowledge of the functioning of notification of victims on the perpetrator's leave of absence. The Prison and Probation Service manage the release of prison inmates. However, shelters sometimes experience that victims are not appropriately notified about a violent partner's leave of absence or release.

Handling personal data is sometimes a challenge for Danish authorities, and breach of personal data security happens occasionally. In some cases, this leads to risky situations for women victims of violence. In 2022, the Data Protection Agency severely criticised the Agency of Family Law for breaches of securing personal data privacy. From 27 May 2021 to 16 August 2022, in 37 cases, the Agency of Family Law unintentionally passed the address of victims with address protection to the perpetrators, with risk to the safety of the victims and their children. Besides severe critique, the Data Protection Agency issued an injunction to the Agency of Family Law to make a renewed risk assessment of all the victims' rights and safety and take the necessary consequences in cases of severe risk. Also, the Data Protection Agency stressed that the Agency of Family Law should establish the necessary organisational and technical measures.⁵⁰ However, recent news coverage shows that from 17 August 2022 to 7 September

⁵⁰ Datatilsynet, [Alvorlig kritik af Familieretshuset](#), 6 September 2022.

2023, 29 persons with name and/or address protection had their names and/or addresses disclosed.⁵¹

Recommendations

1. Denmark should, on a regular basis, evaluate the issuing of notification of victims on leave of absence and release of the perpetrator from prison, and administrative statistics on notifications should be published.
2. Denmark should ensure that authorities and public institutions establish the necessary organisational, personnel, and technical measures to ensure the safe handling of personal data concerning victims of domestic violence, and recurrent training in GDPR should be obligatory.

⁵¹ DR, [29 hemmelige navne- og adresseoplysninger delt ved en fejl](#), 2 October 2023.

Appendix I.

Specific Areas of research on violence against women (selected)

The following research examples illustrate new developments in research on violence against women in Denmark since the 2017 (Baseline) Evaluation Report on Denmark and identify remaining gaps. Since no complete overview of Danish research on violence against women currently exists, the following overview is selective rather than comprehensive.

Domestic violence. There have been many noteworthy improvements in this area since the (Baseline) Evaluation Report on Denmark. For example, VIVE has conducted extensive studies on the prevalence of different types of partner violence in 2020 and 2022.⁵² Moreover, for example, Lev Uden Vold has conducted a high number of studies and mappings regarding subjects related to domestic violence, e.g. regarding after-care for victims,⁵³ the practice and efforts of municipalities,⁵⁴ the after-effects of psychological domestic violence,⁵⁵ tips for professionals regarding, for example, detection of violence and risk assessments,⁵⁶ partner violence during COVID-19,⁵⁷ and on knowledge on domestic violence in general.⁵⁸

The Ministry of Social Affairs, Housing and Senior Citizens has, together with Statistics Denmark, collected comparable data from shelters for battered women since 2017, with further expansions in 2021.⁵⁹ These data have also been connected to social security data.⁶⁰

⁵² Mai Heide Ottosen & Stine Vernstrøm Østergaard, [Psykisk partnervold – en kvantitativ kortlægning](#), VIVE & Lev Uden Vold, 2018, and Mai Heide Ottosen & Stine Vernstrøm Østergaard, [Partnervold i Danmark 2020](#), VIVE & Lev Uden Vold, 2022.

⁵³ Helene Oldrup, Sofia Kjær & Nina Nielsen, [Efterværn for voldsudsatte](#), Lev Uden Vold, 2018. See also, Katrine Bindsbøl Holm Johansen, Nathalie Weih, Marie Nymand Frederiksen & Helene Oldrup, [Veje mod et liv uden vold. Erfaringer fra kvinder og mænd, som har været udsat for eller har udøvet vold mod en partner](#), Lev Uden Vold, 2020.

⁵⁴ Helene Oldrup, Sofia Kjær, Nathalie Weih, [Partnervold - kommunernes praksis og indsats](#), Lev Uden Vold, 2019.

⁵⁵ Helene Oldrup, Sara Andersen, Sofia Kjær, Nina Haggren Nielsen og Cathrine Birk von Rosen, [Psykiske, fysiske og sociale konsekvenser af psykisk vold i parforhold. Kortlægning af forskning](#), Lev Uden Vold, 2018.

⁵⁶ Mette Volsing & Katja Lund Knudsen, [Kortlægning af vejledninger og redskaber til opsporing og vurdering af vold i nære relationer](#), Lev Uden Vold, 2018, Katrine Bindsbøl Holm Johansen, Mette Sophie Volsing & Helene Oldrup, [Opsporing af personer udsat for vold i nære relationer. Et inspirationshæfte til fagpersoner](#), Lev Uden Vold, 2019, Nathalie Weih, Katrine Bindsbøl Holm Johansen & Helene Oldrup, [Risikovurdering af vold i nære relationer. Et inspirationshæfte til fagpersoner](#), Lev Uden Vold, 2019, Helene Oldrup (ed.) & contributors, [Vold i familien. Viden for fagfolk](#), Akademisk Forlag, 2020, and Nathalie Weih & Mathilde Lykkemark Leth, [Hvordan opsporer og håndterer jeg sager om partnervold? En håndbog til kommunale sagsbehandlere](#), Lev Uden Vold, 2021/2022.

⁵⁷ Nathalie Weih & Marie Nymand Frederiksen, [Partnervold under COVID-19](#), Lev Uden Vold, 2020.

⁵⁸ Ida Karlsson, Maiken Kirk Andersen, Siliane Bjerre og Katrine Bindsbøl Holm Johansen, [Viden om vold i nære relationer. En kortlægning af litteratur fra 1984 til 2020 i Danmark](#), Lev Uden Vold, 2021, and Katrine Bindsbøl Holm Johansen, Marie Nymand Frederiksen & Laura Simonsen, [Nordisk viden om partnervold mod mænd – et litteraturstudie](#), Lev Uden Vold, 2021. See also, Mai Heide Ottosen, Stine Vernstrøm Østergaard, Louise Høyer Bom & Juliane Birkedal Poulsen, [Danskernes kendskab til partnervold](#), VIVE, 2022.

⁵⁹ Socialstyrelsen, [Undersøgelse om vold i nære relationer 2022](#), May 2022.

⁶⁰ Ibid.

The Danish National Police collects data on partner violence perpetrators (POLSAS program). As mentioned in the Danish State Report, current challenges include a lack of data on the relationship between the perpetrator and victim.

Essential studies regarding specific groups of violence must also be mentioned, e.g. *pregnant women*,⁶¹ *LGBTIQ+ persons*,⁶² *refugee women*, etc. A recent report from Refugees Welcome describes different conditions and mechanisms that seem to discriminate and endanger women who come to Denmark as asylum seekers, refugees, or family members reunified with refugees and trafficked women.⁶³

Regarding violence against *children* specifically, noteworthy studies can also be mentioned.⁶⁴ The Danish Children's Houses (similar to the Child Advocacy Centers) are used in cases where children are exposed to or suspected of being exposed to sexual, physical and psychological violence (inside and outside the family). As mentioned in the State Report, the Children's Houses collect client data,⁶⁵ and several research projects have been conducted on this data with various partners (e.g., universities, VIVE). However, very little research has considered children's experiences at the Children's House. A national, qualitative study of children's experiences of the Children's Houses will be conducted by the University of Southern Denmark in collaboration with the Danish Children's Houses later this year. A private fund funds this study. Other recent research includes a report on forensic medical exams of violence-exposed children,⁶⁶ and an evaluation of trauma-focused treatment of children and adolescents exposed to sexual assault. The Ministry of Social Affairs, Housing and Senior Citizens requested and financed the latter.⁶⁷ Services for children/adolescents with harmful sexual behaviour are offered at Fønix (anchored at the Children's Houses). This support was previously provided by JanusCenteret, which has published several reports.⁶⁸ Furthermore, the National Research

⁶¹ SocialRespons, [Partnervold før, under og efter graviditet. En undersøgelse af partnervold i forbindelse med graviditet blandt kvinder på danske krisecentre](#) Mary Fonden & LOKK, 2022.

⁶² Helle Max Martin, Josefine Frøsløv-Thomsen & Juliane Birkedal Poulsen, [Partnervold i LGBT+-forhold. Oplevelser af partnervold og erfaringer med støttetilbud](#), 2022.

⁶³ Michala Clante Bendixen, [They don't know how much stress we have. Women in the asylum system and the integration process](#), Refugees Welcome, 2023.

⁶⁴ See, for example, Mai Heide Ottosen, Signe Frederiksen & Sofie Henze-Pedersen, [Psykisk vold mod børn i hjemmet. Et vidensgrundlag](#), VIVE, 2020, Mai Heide Ottosen og Sofie Henze-Pedersen [Fysisk vold og seksuelle overgreb mod børn. En vidensopsamling](#), VIVE, 2021, Jonathan Salka, Katrine Bindsbøl Holm Johansen & Louise Glerup Aner, [Vold i barndommen. Voksne danskeres erfaringer med vold i barndomshjemmet](#), Lev Uden Vold, 2023, Louise Glerup Aner, Jonathan Salka & Katrine Bindsbøl Holm Johansen, [Vold gennem livet. En undersøgelse af sammenhænge mellem vold i barndomshjemmet og partnervold i voksenlivet](#), Lev Uden Vold, 2023, and Katrine Bindsbøl Holm Johansen, Mathilde Lykkemark Leth, Nanna Westersø Thorbjørnsen & Louise Glerup Aner, [Går vold i arv? En kvalitativ undersøgelse af betydningen af vold i opvæksten for familielivet som voksen](#), Lev Uden Vold, 2023.

⁶⁵ For further information, please see the overview on the website of Social- og Boligstyrelsen: [Udgivelser om de danske børnehuse](#).

⁶⁶ Pernille Spitz, Jytte Banner, Brian Belling & Maja Markmann, [Systematisk retsmedicinsk screening af børn ved mistanke om vold](#), Børnehus Hovedstaden, Københavns Politi og Retsmedicinsk Institut ved Københavns Universitet, June 2022.

⁶⁷ Katrine Iversen, Helle Hansen, Sofie Henze-Pedersen, Jonatan Kjældgaard Jensen, Asger Graa Andreasen & Maiken Pontoppidan, [Behandling til børn og unge udsat for seksuelle overgreb](#), VIVE, 2023.

⁶⁸ See, for example, reports by JanusCenteret at: [Statusrapporter](#).

Network on Sexual Abuse against Children recently published a book on child sexual abuse prevention and treatment in the Danish setting.⁶⁹

Sexual violence. Since the (Baseline) Evaluation Report on Denmark, many noteworthy projects on sexual violence have been conducted.⁷⁰ Apart from a few population studies, the State Report did not include information on research on sexual assault committed outside of relationships, all though sexual violence (by partners and non-partners alike) is a core aspect of violence against women. In Denmark, public support for young/adult survivors of sexual assault is provided at nine national sexual assault centres (see section Article 25). Most centres publish client data each year,⁷¹ and several centres are currently working on establishing/improving a database to improve data collection and research based on client data. However, lack of funding/staffing and legislation continues to delay this process. The Danish sexual assault centres conduct independent research and collaborate with external researchers (e.g., universities).⁷² Private funds almost exclusively fund this research due to limited internal funding aimed at research.⁷³

The sexual assault centre in Aarhus is responsible for the main sexual assault website in the country (www.voldtaegt.dk), which is currently being updated and expanded to provide better resources for those affected by sexual violence and provide a platform to gather and share Danish research.⁷⁴ Research collaborations between service providers and researchers are essential to create practice near research and ensure broad dissemination and implementation of results.

All though many or most instances of sexual assault in Denmark are never reported, reporting, charges and convictions are on the rise, in part following the new legal definition of rape.

⁶⁹ Kuno Sørensen, Maj Hansen, Mimi Strange Siri Jonina Egede & Troels Græsholt-Knudsen, [Seksuelle overgreb mod børn og unge. En antologi om forebyggelse og behandling 2021](#), University of Southern Denmark, 2021.

⁷⁰ See, for example, Laura Deen, Katrine Bindsbøl Holm Johansen, Sanne Pagh Møller & Bjarne Laursen, [Vold og seksuelle krænkelser. En afdækning af omfang og udvikling af fysisk vold og seksuelle overgreb og omfang af seksuelle krænkelser samt en analyse af erfaringer med digitale seksuelle krænkelser](#), Statens Institut for Folkesundhed, 2018, Katrine Bindsbøl Holm Johansen, Gender, power and sexual violence – An anthropological exploration of young people’s perceptions and unwanted sexual experiences in Denmark, PhD thesis, University of Southern Denmark, 2019, Sarah van Mastrigt, [Unges stereotype holdninger til voldtægt](#), Det Kriminalpræventive Råde, 2021, and Nathalie Weih, Julie Enevoldsen & Katrine Bindsbøl Holm Johansen, [Mod en nuanceret forståelse af seksualiserede overgreb – En undersøgelse af ofres erfaringer med magtanvendelse, modstand og følger af seksualiserede overgreb baseret på interview med fagpersoner](#), Lev Uden Vold, 2022. See also, the privately funded study on sector transitions and inequalities in treatment following sexual assault, which will be conducted in 2024-2026 by Maj Hansen and others: [Who Receives Help Following Sexual Assault?](#), University of Southern Denmark, 2024-2026.

⁷¹ See, for example, Center for Seksuelle Overgreb, [Årsstatistik 2022](#), Rigshospitalet, April 2023.

⁷² See, for example,

⁷³ Recent and ongoing research conducted at the centre in Copenhagen is listed at: [Aktuel forskning i seksuelle overgreb på unge og voksne](#). Recent and ongoing research at the second largest sexual assault centre (Aarhus) includes several collaborations with the Danish Universities, e.g. a recently completed project on underserved survivors of sexual assault: [Ph.d.-projekt: En personcenteret tilgang til at forstå støttebehov efter seksuelle overgreb](#). This study indicated that more research is needed on how to support survivors of sexual assault who may not be eligible for support at a sexual assault centre due to multiple adversities (e.g., co-occurring substance misuse, severe mental illness).

⁷⁴ The project is funded by a private fund and led by a Danish University (Maj Hansen & Maria Hardeberg Bach, [eHealth for sexual assault](#), University of Southern Denmark, 2021-2024).

Several research projects are currently being conducted on sexual assault in the legal context.⁷⁵

Much more work has recently been conducted in the area of sexual harassment. The National Research Centre for Working Environment (Det Nationale Forskningscenter for Arbejdsmiljø – NFA), an agency under the auspices of the Ministry of Employment, regularly conducts surveys on incidences of sexual harassment in Danish workplaces. This work includes the recent study conducted in collaboration with one of the Danish Universities focusing on updating and validating more nuanced measurements of sexual harassment in the workplace.⁷⁶ Sexual harassment and gender inequalities are also evident in academia, and several research projects on sexual harassment and gender inequalities at Danish universities are currently being conducted.⁷⁷

⁷⁵ See, for example, Marie Skov, Sarah van Mastrigt & Andreas Videbæk Jensen, [Comparing Rape Myth Acceptance Among Police Trainees and Medical Students: A Preliminary Danish Validation of the Updated Illinois Rape Myth Acceptance Scale](#), *Violence Against Women*, 2022, Volume 28, Issue 11, pp. 2649-2676. See also, about an ongoing project on survivors experience with the justice system: <https://marycenter.ku.dk/nyheder/nyt-forskningsprojekt-skal-forbedre-voldtaegtsofres-vilkaar-i-retssystemet/>.

⁷⁶ Please see: https://www.sdu.dk/da/sif/forskning/projekter/uoensket_seksuel_opmaerksomhed_fra_ledere_og_kollegaer.

⁷⁷ Please see: <https://eige.europa.eu/gender-mainstreaming/toolkits/gear/legislative-policy-backgrounds/denmark>.