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Submission on Denmark

What is missing in Denmark's first National Action Plan Against Racism (NAPAR)?

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CAP Liberté de Conscience is a secular international organization created in France in 1995. We monitor and combat discrimination and violations of the Human Rights. We regularly inform the international community on these issues.

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Analysis of Denmark’s National Action Plan Against Racism (NAPAR) in Light of UN Recommendations

Introduction

On behalf of CAP Liberté de Conscience, an NGO with consultative status at the United Nations, Bashy Quraishy – Secretary General - EMISCO (European Muslim Initiative for Social Cohesion), Gregory Christensen – Leader of Youth for Human Rights – Denmark, this submission provides an expert analysis of Denmark’s first National Action Plan Against Racism (NAPAR). The analysis draws on two key documents: the summary of references to racism and xenophobia in Denmark’s previous Universal Periodic Review (UPR) cycle and the critical assessment titled *What’s Missing in Denmark’s First National Action Plan Against Racism (NAPAR)*. The purpose of this analysis is to evaluate whether NAPAR adequately addresses the recommendations made by UN member states and treaty bodies during Denmark’s last UPR, particularly regarding structural racism, xenophobia, and discrimination against vulnerable communities.

During the 3rd UPR cycle, Denmark received multiple recommendations urging it to strengthen its efforts to combat racism, xenophobia, and hate speech. These included calls to adopt a comprehensive national action plan, improve data collection, address anti-Muslim discrimination, and ensure independent monitoring. The following analysis assesses the extent to which NAPAR incorporates these international recommendations.

Summary of Key Gaps in NAPAR vis-à-vis UN Recommendations

Denmark’s National Action Plan Against Racism (NAPAR) shows significant shortcomings when measured against specific UN recommendations. Notably, it fails to explicitly address anti-Muslim racism and Islamophobia, despite repeated calls from states such as Malaysia and Venezuela, as well as UN treaty bodies, to combat discrimination against religious minorities. Furthermore, the plan lacks a standardized system for disaggregated hate crime data collection—a key recommendation from CERD—hindering the ability to monitor incidents effectively or tailor interventions. This narrow focus, which overlooks groups such as Afro-Danes, Roma, and migrants, contradicts the inclusive approach urged by the UPR Working Group.

Additionally, NAPAR omits essential structural reforms and participatory mechanisms highlighted in the UPR. It does not include clear prohibitions on racial or religious profiling, nor does it revise stigmatizing urban policies such as the “ghetto law,” despite recommendations from Brazil and Jordan to address these issues. The plan also lacks provisions for independent oversight and meaningful civil society involvement—elements stressed by Botswana and Ghana to ensure accountability and sustainability. These gaps collectively undermine the plan’s potential to comprehensively address racism and align with Denmark’s international human rights obligations.

What is missing in Denmark’s first National Action Plan Against Racism (NAPAR)?

Denmark’s first National Action Plan Against Racism (NAPAR) marks an overdue step toward addressing racial discrimination. However, the plan is narrowly framed, names only Jewish and Greenlandic communities as specific beneficiaries, and leaves out major internationally recognized priorities such as anti-Muslim racism, structural reforms, comprehensive data collection, and independent monitoring. Without addressing these gaps, NAPAR risks being a symbolic exercise rather than a transformative tool.

Anti-racist NGOs in Denmark, like Youth for Human Rights, Fair Play, SOS Against Racism, European Muslim Initiative for Social Cohesion and many more have been working with many European organizations on the issue of racism, discrimination and lack of progress concerning human rights situation. In this respect, we have provided concrete information to ECRI (European Commission against Racism and Intolerance) and ENAR-European Network Against Racism.

NGO information have been instrumental in recommendations that ECRI asked Danish governments to implement but until now, it has been a difficult process. In the latest National Action Plan Against Racism (NAPAR) that Denmark has issued, we find various neglections.

1. Focus on Anti-Muslim Racism and Islamophobia

- **Absence of explicit mention of Muslims or Islamophobia:** Despite repeated recommendations by ECRI (European Commission against Racism and Intolerance) urging Denmark to address anti-Muslim discrimination, the plan only names Jews and Greenlanders as specific target groups. Notably, it omits Muslims entirely.
- **ECRI’s specific recommendations:** The ECRI asked the government to prioritize anti-Muslim racism and include actions against it—these calls remain unfulfilled in the published plan.

2. Broad, Holistic Measures Against Racism

- **Data collection gaps:** ECRI also previously recommended a unified system for registering hate crime and hate speech incidents with disaggregated data and better awareness-raising. This has not been integrated into NAPAR.
- **Structural safeguards lacking:** Criticisms also point to missing elements such as clear prohibitions on racial profiling, avoidance of stigmatizing categories like “Western” vs “non-Western,” and elimination of punitive policies like the "ghetto law" and forced evictions. These remain issues unaddressed in the new plan.

Recommendation / Concern	Status in NAPAR
Explicit inclusion of anti-Muslim Islamophobia measures	Missing
Comprehensive hate crime data collection	Missing
Stopping categorization of “non-Western” groups	Not addressed
Clear legal ban on racial profiling	Not addressed

Recommendation / Concern

Status in NAPAR

Addressing “ghetto policy” and forced evictions

Not addressed

In essence, while the plan is a welcome step, it falls short of addressing deep-seated and systemic issues—particularly anti-Muslim racism, data transparency, profiling, and discriminatory urban policies—that have long been flagged by international bodies.

1. **Deeper dive into the main gaps** (what’s missing and why that matters)
2. **Best-practice examples** (what other countries / institutions do)
3. **Concrete recommendations** Denmark could adopt

Why the main gaps in Denmark’s first National Action Plan Against Racism (NAPAR) matter?

A. No explicit focus on anti-Muslim racism / Islamophobia

What’s missing: recognition of religion (Muslims) as a protected target in action planning and tailored initiatives to combat anti-Muslim discrimination.

Why it matters: when a plan doesn’t name or target a group that experiences patterns of discrimination, policies (training, data collection, awareness campaigns, legal guidance) rarely reach the lived problem. Islamophobia often appears in specific forms — surveillance, workplace discrimination, school bullying, workplace dress/code issues — that generic anti-racism campaigns can miss.

B. Weak / absent disaggregated data and hate-incident recording

What’s missing: a standardised system to collect and publish disaggregated data on hate crimes, discrimination complaints and outcomes (by ethnicity, religion, language, gender, etc.).

Why it matters: without reliable data you can’t measure scope, target interventions, or evaluate progress. Under-recording by police and lack of trust among victims compounds the invisibility problem.

C. No clear anti-profiling safeguards and policing reforms

What’s missing: explicit prohibitions on racial/religious profiling, guidance and oversight mechanisms for police stops, intelligence practices, and community policing.

Why it matters: disproportionate law-enforcement practices are a frequent pathway into broader structural exclusion (housing, jobs, surveillance).

D. No structural policy changes on “ghetto” / neighbourhood policies

What’s missing: a reevaluation of punitive urban policies that stigmatize whole neighbourhoods and lead to eviction, surveillance or targeted demolitions.

Why it matters: policies labelled as “integration” or “parallel societies” that rely on punitive levers often reproduce racialised disadvantage.

E. Limited civil-society partnership and independent oversight

What’s missing: a funded, statutory independent monitoring body, plus formal co-design with affected communities (Muslim, Roma, immigrant groups) and guaranteed funding lines for local civil-society organisations.

Why it matters: top-down plans without community co-ownership tend to miss priorities and fail to build trust.

Best-practice elements from other countries / bodies and what works

Below are broad approaches that are repeatedly recommended by international bodies and that countries with stronger records typically use:

1. Explicit naming + tailored measures

- **Why:** Identifying groups (e.g., Muslims, Roma, Jews, Afro-descendants, indigenous peoples) permits targeted outreach, legal guidance and prevention.
- **How implemented elsewhere:** national plans that name Islamophobia, antisemitism, anti-Roma racism and then assign specific actions (hotlines, community liaisons, tailored education modules).

2. Comprehensive, standardised data systems

- Collect civil-service, police and NGO data with standard categories; publish regular dashboards and an annual audit.
- Build easy reporting channels (multi-lingual hotlines, online forms) and legal protections for reporters.

3. Independent monitoring + statutory responsibilities

- An independent equality body (with investigatory powers) or a commissioner for racism who publishes annual, public evaluations and can require action.

4. Police reforms and anti-profiling law

- Clear legal definition of prohibited profiling; training; body-worn camera policies; civilian review boards; data on stops by race/religion/ethnicity.

5. Education & public-awareness campaigns

- School curricula on racism, and civic pluralism; national awareness campaigns designed with communities.

6. Funding and multi-year commitments

- Multi-year funding lines for anti-racism NGOs and community organisations so projects can sustain impact beyond a single electoral cycle.

7. Intersectional, structural targets

- Addressing labour market discrimination, housing, access to services, and legal frameworks (e.g., anti-discrimination law enforcement, access to justice).

Examples of where pieces of this exist: some EU governments and the EU Fundamental Rights Agency have recommended and implemented these elements; Canada (federal anti-racism strategy, funding to community groups), the UK (data initiatives like the Race Disparity Audit — flawed but illustrative), and Germany (independent anti-discrimination bodies and specific commissioner posts for certain issues) show parts of these best practices in operation.

Why Denmark might be avoiding an inclusive, explicitly broad plan?

Here is a list of concrete recommendations, Denmark could adopt, which are practical, and evidence based

If the government wanted a genuinely inclusive plan that follows international best practice, it could adopt these steps quickly:

1. **Explicitly recognise religion (including Muslims) and other protected grounds** in the national plan and attach tailored actions.
2. **Create a standardised hate-incident and discrimination data framework** (public dashboards, disaggregation by religion/ethnicity/gender/age/region).
3. **Establish or empower an independent national anti-racism commissioner/monitor** with investigatory powers and a duty to publish evaluations.
4. **Ban and audit racial/religious profiling** with police reporting on stops/searches and civilian oversight.
5. **Reassess punitive “ghetto” laws** — introduce housing policies that avoid mass evictions and stigmatisation; prioritize investment and community-led regeneration.
6. **Fund civil society and co-design measures** — guarantee multi-year funding for community organisations (Muslim, migrant, Roma, Afro-descendant, indigenous) and mandate community representation on implementation panels.
7. **Roll out national education packages**; anti-bias training for public servants, teachers, police).
8. **Monitoring & evaluation with clear targets** — set measurable outcomes (e.g., increase in reporting rates, reductions in verified hate-incidents, employment/housing parity goals) and publish progress annually.

Recommendations

1. **Explicitly include anti-Muslim racism and Islamophobia in NAPAR**
 - Add targeted measures to address discrimination against Muslims, including awareness campaigns, legal protections, and policy reforms, as repeatedly recommended by ECRI and UN bodies.
2. **Establish a standardized system for disaggregated hate crime data collection**
 - Implement a unified framework to collect and publish data on hate incidents by ethnicity, religion, gender, and other criteria, ensuring transparency and enabling evidence-based interventions.
3. **Prohibit racial and religious profiling and reform discriminatory urban policies**
 - Introduce clear legal bans on profiling, abolish stigmatizing labels like "non-Western," and reassess the "ghetto law" to prevent forced evictions and promote inclusive urban development.
4. **Ensure independent monitoring and meaningful civil society participation**
 - Create an independent anti-racism commissioner role with investigatory powers and guarantee multi-year funding for NGOs and community-led

initiatives to ensure accountability and sustainability.