

Coronavirus pandemic in the EU – Fundamental Rights Implications

Country: Denmark

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1 Measures taken by government/public authorities impacting on specific freedoms

Please briefly describe the main developments, between 1 September – 31 October 2020, in the legal framework and related measures adopted in your country in response to the Coronavirus pandemic with respect to emergency laws/state of emergency, freedom of assembly and freedom of movement.

1.1 Emergency laws/states of emergency

As previously reported, the emergency measures in Denmark were gradually repealed during the summer months. However, the number of COVID-19 cases in Denmark has been on the rise since September, which led the government to introduce new emergency measures. To the Institute's knowledge, no state of emergency has been declared and no cases concerning the legality of emergency measures are pending before national courts.

On 7 September 2020, the Ministry of Health introduced measures that only applied to the capital area and the municipality of Odense, due to the particular rise in COVID-19 cases in those areas. The measures included a reduction in the number of people allowed to assemble from 100 to 50 people, further restrictions on opening hours for restaurants and bars, and a number of recommendations regarding social and physical distancing and working from home as much as possible.¹

Due to the continued increase in cases of COVID-19 in the capital area, restrictions targeting night life and restaurants were introduced on 15 September 2020. Restaurants and bars must close no later than 10 p.m., face masks or face shields are required when moving around the restaurant or bar and there is a heightened awareness on following the distance requirements.² On 19 September, the restrictions were expanded to apply to all of Denmark.³

On 23 October 2020, further restrictions were introduced due to the worryingly increase in the number of COVID-19 cases.⁴ As of 26 October 2020, no more than 10 people, as a general rule, can gather outside of private homes and a general ban of serving and selling alcohol between 10 p.m. and 5 a.m. has been introduced. As of 29 October 2020, face masks or shields are now required in health and elderly care sectors, parts of the social care sector and indoor public spaces, including stores and certain educational institutions. It is furthermore recommended to cancel arrangements that are of a primarily social nature and to limit the number of persons to have social contact with outside one's own household, work colleagues ect.⁵

¹ Denmark, *Sundheds- og Ældreministeriet*, press release, available in Danish at: <https://sum.dk/Aktuelt/Nyheder/Coronavirus/2020/September/Nye-tiltag-mod-COVID-19.aspx>.

² Denmark, *Sundheds- og Ældreministeriet*, press release, available in Danish at: <https://sum.dk/Aktuelt/Nyheder/Coronavirus/2020/September/Nye-tiltag-mod-COVID-19-1509.aspx>.

³ Denmark, *Sundheds- og Ældreministeriet*, "Tiltag til udbrudshåndtering" ("Initiatives to manage the outbreak"), available in Danish at: [https://sum.dk/Aktuelt/Nyheder/Coronavirus/2020/September/~media/Filer%20-%20dokumenter/01-corona/Tiltag-udbrudshaandtering-18092020.pdf](https://sum.dk/Aktuelt/Nyheder/Coronavirus/2020/September/~/media/Filer%20-%20dokumenter/01-corona/Tiltag-udbrudshaandtering-18092020.pdf).

⁴ Denmark, *Sundheds- og Ældreministeriet*, press release, available in Danish at: <https://sum.dk/Aktuelt/Nyheder/Coronavirus/2020/Oktober/Bekymrende-stigning-i-smitte-resultater-i%20nye-tiltag-mod-COVID-19.aspx>.

⁵ Denmark, *Sundheds- og Ældreministeriet*, "Oversigt over gældende og nye COVID-19-tiltag" (Overview of current and new COVID-19 initiatives), available in Danish at: <https://sum.dk/Aktuelt/Nyheder/Coronavirus/2020/Oktober/~media/Filer%20-%20dokumenter/01-corona/Oversigt-24102020.pdf>.

1.2 Freedom of assembly

The number of people allowed to assembly was reduced from 100 to 50 on 7 September 2020 in the capital area and the municipality of Odense.⁶ On 19 September 2020, the assembly ban of maximum 50 people was introduced to the rest of the country.⁷ On 26 October, the assembly ban was further reduced to 10 people.⁸ There are exceptions for assemblies such as funerals, religious communities and teaching where up to 500 people may assemble, cf. consolidation act no. 1371, section 3. The consolidation act does not apply to the Parliament, the courts, gatherings with a political objective, hospitals and certain athletes, who may therefore assemble without any restrictions in regard to the number of people assembled, cf. consolidation act no. 1371, section 12.

The first of the above mentioned assembly bans was supposed to expire on 5 October 2020, but on 1 October 2020 the ban was extended until 19 October 2020⁹ and on 18 October 2020 the ban was extended until 1 November 2020¹⁰. The current assembly ban is supposed to expire on 22 November 2020.¹¹ As part the extension of the assembly ban on 1 October 2020 the assembly ban was also expanded to include private held parties such as weddings, birthdays and confirmations. Events where people are sitting down facing the same direction, such as theatres, cinemas and playing fields, are still allowed for up to 500 people.¹²

On 3 October 2020 the Minister of Health informed that the Director of Public Prosecutions (*Rigsadvokaten*) will seek to raise the DKK 2.500 penalty given if violating the assembly ban by running a

⁶ Denmark, *Sundheds- og Ældreministeriet*, "Information om udbrudshåndtering i Københavnsområdet og Odense Kommune" (Information on the management of the outbreak in the Copenhagen area and Odense municipality), available in Danish at: <https://sum.dk/Aktuelt/Nyheder/Coronavirus/2020/September/~media/Filer%20-%20dokumenter/01-corona/07092020-Pmoede/Information.pdf>

⁷ Denmark, "Bekendtgørelse nr. 1371 om forbud mod større forsamlinger og mod adgang til og restriktioner for lokaler og lokaliteter i forbindelse med håndtering af covid-19" (Consolidation act No. 1371 on prohibition of major assemblies and prohibition of access to and restrictions on certain premises for coronavirus disease management), available in Danish at: <https://www.retsinformation.dk/eli/lta/2020/1371>

⁸ Denmark, "Bekendtgørelse nr. 1509 om forbud mod større forsamlinger og mod adgang til og restriktioner for lokaler og lokaliteter i forbindelse med håndtering af covid-19" (Consolidation act. No. 1509 on prohibition of major assemblies and prohibition of access to and restrictions on certain premises for coronavirus disease management), available in Danish at: <https://www.retsinformation.dk/eli/lta/2020/1509>

⁹ Denmark, "Bekendtgørelse nr. 1442 om forbud mod større forsamlinger og mod adgang til og restriktioner for lokaler og lokaliteter i forbindelse med håndtering af covid-19" (Consolidation act No. 1442 on prohibition of major assemblies and prohibition of access to and restrictions on certain premises for coronavirus disease management), available in Danish at: <https://www.retsinformation.dk/eli/lta/2020/1442>

¹⁰ Denmark, "Bekendtgørelse nr. 1458 om forbud mod større forsamlinger og mod adgang til og restriktioner for lokaler og lokaliteter i forbindelse med håndtering af covid-19" (Consolidation act No. 1458 on prohibition of major assemblies and prohibition of access to and restrictions on certain premises for coronavirus disease management), available in Danish at: <https://www.retsinformation.dk/eli/lta/2020/1458>

¹¹ Denmark, *Sundheds- og Ældreministeriet*, "Oversigt over gældende og nye COVID-19-tiltag" (Overview of current and new COVID-19 initiatives), available in Danish at: <https://sum.dk/Aktuelt/Nyheder/Coronavirus/2020/Oktober/~media/Filer%20-%20dokumenter/01-corona/Oversigt-24102020.pdf>.

¹² Denmark, "Bekendtgørelse nr. 456 om forbud mod store forsamlinger i forbindelse med håndteringen af covid-19" (Consolidation act No. 456 on prohibition of major assemblies and prohibition of access to and restrictions on certain premises for coronavirus disease management), available in Danish at: <https://www.retsinformation.dk/eli/lta/2020/456>.

number of test cases before national courts. This is done on the basis of a number of parties held in the month of September 2020, where more than the allowed 50 people assembled.¹³

1.3 Freedom of movement

As described in the report from July 2020, in regards to countries within EU and Schengen area, as well as the UK, Denmark operates with “open” and “banned” countries. The classification of countries is based on objective criteria taking account of the health situation in the countries concerned and following a precautionary principle. This is described in detail in the report from July 2020. As of 26 October 2020, countries can also be classified as “high risk”. This classification is based on common EU criteria established in Council Recommendation 2020/1475 of 13 October 2020 on a coordinated approach to the restriction of free movement in response to the COVID-19 pandemic.

A foreigner who resides in an “open” country can enter Denmark regardless of purpose. Foreigners who resides in “banned” countries, can enter Denmark if they have a worthy purpose. Foreigners residing in “high risk” countries can enter if they have both a worthy purpose and can show a negative COVID-19 test taken no more than 72 hours before entry.

The requirement to show a negative COVID-19-test was imposed on travellers resident in “high-risk” countries as of 26 October 2020. The test requirement does not apply to persons, who enter Denmark in connection with the transportation of freight, or to travel through Denmark (persons in transit).

The model is accompanied by a Nordic mechanism. Under this mechanism, if a Nordic country is categorised as “closed”, regions of the country will be categorised as “open” if they meet the above objective criteria.

Further, there is a special model in place for persons resident in the border regions. Persons resident in border regions may enter Denmark freely when a border region is classified as “open”. If the region does not meet the criteria of being classified as “open”, persons residing in these regions may enter Denmark with either a worthy purpose or a negative COVID-19-test taken no more than 72 hours before entry.

Denmark introduced a model for opening the borders for countries outside of the EU and Schengen area and United Kingdom in July 2020. The model is based on an EU list on the basis of Council Recommendation 2020/912 of 30 June 2020 on the temporary restriction on non-essential travel into the EU and the possible lifting of such restriction supplemented by national criteria.

The list of countries classified as “open”, “banned”, and “high-risk” is updated weekly.

For a detailed and up to date description of the current measures in place, please go to: www.coronasmitte.dk/en/rules-and-regulations

¹³ Denmark, DR.dk, “Højere bøder for piratfester: 4.000 kroner for at deltage – 10.000 for at arrangere” (Higher fines for illegal parties: DKK 4.000 to participate – DKK 10.000 to arrange), available in Danish at: <https://www.dr.dk/nyheder/indland/hoejere-boeder-piratfester-4000-kroner-deltage-10000-arrangere>.

2 Implications of Covid-19 and measures to contain it on specific social rights

Please provide information on legislation/measures taken by the government/public authorities, between 1 September – 31 October 2020, in response to COVID-19 that have impacted negatively on relevant social rights with respect to two of the following areas of life: education, work, health care and housing.

2.1 Health care

In the spring the Danish healthcare system was reorganized because of COVID-19. This caused cancellations of planned operations to create room for expected COVID-19 patients. In the beginning of September 2020, new numbers from The Regions (*Danske Regioner*) showed that 52.000 fewer operations were carried out in the months of March and April 2020 compared to 2019. This has caused a substantial number of patients waiting on getting an operation. The Regions fear that this number will further increase because of the current number of requirements and resources allocated in regard to protective equipment, hygiene demands and the COVID-19 preparedness system.¹⁴

All adults and children older than two years can get a COVID-19-test free of charge. The test can be booked online on the webpage *coronaprøver.dk* ('*coronatesting.dk*'). The citizens use their personal safe login *NemID*.¹⁵ A referral from a doctor or other health care personnel is not required before making the appointment. If a parent is worried, in doubt or want to have their child under two years tested, he or she can call their general practitioner for guidance and an assessment of when the testing should be done.¹⁶

Previously, parents had to get a referral from their general practitioner, a doctor from the emergency service or *Styrelsen for Patientsikkerhed* (the Danish Patient Safety Authority) to obtain a COVID-19 test for their children. This caused a lot of pressure on the health services and families because children were sent home from school if there had been an outbreak in their class or at the school. Therefore, the possibility to have children tested for COVID-19 under the same procedure as adults was announced on 7 September 2020.¹⁷

The COVID-19 test results are communicated on the Health Authorities' collective webpage: *Sundhed.dk* or through the Health Authorities app: *MinSundhed*. Using the same personal *NemID* login, the citizen can access their result which is available no later than 72 hours after the testing has

¹⁴ Denmark, *Altinget.dk*, "Kæmpe corona-dyk: Sygehusene har gennemført 75.000 færre operationer end sidste år (Huge corona dive: Hospitals have carried out 75.000 less operations compared to last year), available in Danish at: <https://www.altinget.dk/sundhed/artikel/kaempe-corona-dyk-sygehusene-har-gennemfoert-over-80000-faerre-operationer-end-sidste-aar>.

¹⁵ Denmark, *Coronaprøver.dk*, available in Danish at: <https://www.coronaprover.dk/Account/NemIdLogin?RequestPath=%2F>.

¹⁶ Denmark, *Sundhed.dk*, "Nu kan alle blive testet for COVID-19" (Now everyone can be tested for COVID-19), available in Danish at: <https://www.sundhed.dk/borger/corona/information-om-corona/nu-kan-alle-blive-testet-for-covid19/>.

¹⁷ Denmark, *Sundheds- og Ældreministeriet*, "Lettere adgang for børn til COVID-19 test" (Easier access for children to receive COVID-19 tests), available in Danish at: <https://sum.dk/Aktuelt/Nyheder/Coronavirus/2020/September/Lettere-adgang-for-boern-til-covid-19-test.aspx>.

been done.¹⁸ However, in most cases the result is available the same day or the day after.¹⁹ On 29 October 2020, only 1 out of 38 test centres had waiting times to get a COVID-19 test done and the waiting time was one day.²⁰

From 1 October 2020 until January 2021 free influenza vaccines are offered to people over 65 years, health care workers in close contact with patients, pregnant women and people with a higher risk of a serious course of disease.²¹ In addition free pneumococcus vaccines are offered to people over 65 years, nursing home residents and people with a higher risk of a serious course of disease.

To gain more knowledge about COVID-19 and how to handle the disease, *Statens Serum Institut* sent out a questionnaire to 1 million Danes and offered an antibody test to 500.000 of them. The project is called *Vi tester Danmark* (We test Denmark) and was announced on 17 September 2020.²²

2.2 Housing

Temporary visit restrictions have been imposed for people living at sheltered residences which has had consequences in regard to the possibility to receive visits from family and friends. The possibility to impose local visit restrictions was prolonged until 1 October 2020.²³ Later it was prolonged until 1 March 2021.²⁴ The sheltered residences can make their own visit restrictions after an assessment of the physical circumstances at the residence, the risks for the residents and employees, the current

¹⁸ Denmark, *Coronaprøver.dk*, "Information om test for ny coronavirus/COVID-19-virustest ved halspodning" (Information on test for new coronavirus/COVID-19-virus via throat swab), available in Danish at: https://www.coronaprover.dk/lib/coronainformation-2020-09-08_DK.pdf.

¹⁹ Denmark, *Statens Serum Institut*, "Vente- og svartider" (Waiting times), available in Danish at: <https://tcdk.ssi.dk/vente-og-svartider>.

²⁰ Denmark, *Danske Regioner*, "Overblik over ventetider den 29/10-2020" (Overview of waiting times on 29 October 2020), available in Danish at: <https://www.regioner.dk/media/14118/sundhedsspor-overblik-over-ventetider-29102020.pdf>.

²¹ Denmark, "Bekendtgørelse nr. 1429 om gratis influenzavaccination til visse persongrupper" (Consolidation act No. 1429 on free influenza vaccines for certain groups), available in Danish at: <https://www.retsinformation.dk/eli/lta/2020/1429>.

²² Denmark, *Statens Serum Institut*, "'Vi tester Danmark' skal styrke kampen mod COVID-19" ('We test Denmark' to strengthen the fight against COVID-19), available in Danish at: <https://www.ssi.dk/aktuelt/nyheder/2020/vi-tester-danmark-skal-styrke-kampen-mod-covid-19>.

²³ Denmark, "Bekendtgørelse nr. 1253 om ændring af bekendtgørelse om mulighed for lokalt at fastsætte midlertidige besøgsrestriktioner på anbringelsessteder og botilbud m.v. på socialområdet i forbindelse med håndtering af Corona-virus sygdom 2019 (COVID-19)" (Consolidation act No. 1253 on the possibility to locally impose temporary visit restrictions at sheltered residences within the social area in connection with managing coronavirus disease (COVID-19)), available in Danish at: <https://www.retsinformation.dk/eli/lta/2020/1253>.

The consolidation act has later been replaced by consolidation act. No. 1613 on the possibility to locally impose temporary visit restrictions at sheltered residences within the social area in connection with managing coronavirus disease (COVID-19)), available in Danish at: <https://www.retsinformation.dk/eli/lta/2020/1613>.

²⁴ Denmark, "Bekendtgørelse nr. 1403 om ændring af bekendtgørelse om mulighed for lokalt at fastsætte midlertidige besøgsrestriktioner på anbringelsessteder og botilbud m.v. på socialområdet i forbindelse med håndtering af Corona-virus sygdom 2019 (COVID-19)" (Consolidation act No. 1403 on the possibility to locally impose temporary visit restrictions at sheltered residences within the social area in connection with managing coronavirus disease (COVID-19)), available in Danish at: <https://www.retsinformation.dk/eli/lta/2020/1403>. The consolidation act has later been replaced by consolidation act. No. 1613 on the possibility to locally impose temporary visit restrictions at sheltered residences within the social area in connection with managing coronavirus disease (COVID-19)), available in Danish at: <https://www.retsinformation.dk/eli/lta/2020/1613>.

infection rate and other relevant conditions. Furthermore, two appendixes to the relevant consolidation act each include a list of municipalities where general visit restrictions are imposed for the entire municipality.²⁵ The lists in the appendixes are regularly updated.

3 Negative impact on social rights for vulnerable groups including measures to address this

Please select and provide information concerning two groups whose social rights were particularly negatively impacted with respect to developments/measures adopted in relation to COVID-19, between 1 September – 31 October 2020. For each of the two groups selected – highlight which social rights were most impacted. Also, identify any government and related measures that were introduced to alleviate the negative impact on these groups.

3.1 Older people

Since the 2nd of July 2020 nursing homes has generally been open for visits. The Danish Patient Safety Authority (*Styrelsen for Patientsikkerhed*) have the authority to introduce and lift restrictions on visits to nursing homes, cf. consolidation act no. 1030, section 6.²⁶ The consolidation act was supposed to expire on 1 October 2020, but on 23 September 2020 the expiration date was postponed until 1 March 2021.²⁷ The Danish Patient Safety Authority keep an updated list of specific nursing homes or municipalities with visit restrictions or visit bans on their webpage.²⁸

The DaneAge Association (*Ældresagen*) has received complaints and stories from elders and their relatives about nursing homes who impose visit bans and visit restrictions without legal basis. Only the Danish Patient Safety Authority have the authority to decide on visit restrictions based on health-related considerations as part of the management of COVID-19. Nonetheless there are stories of several nursing homes that impose their own restrictions. According to the DaneAge Association this misinterpretation and lack of compliance with consolidation act no. 1030 has many negative consequences for the residents at the nursing homes. The DaneAge Association have received stories of residents that experience loneliness, unhappiness, depression symptoms, physical or mental functional impairment and some who no longer think that life is worth living. The DaneAge Association

²⁵ Denmark, "Bekendtgørelse nr. 1613 om mulighed for lokalt at fastsætte midlertidige besøgsrestriktioner på anbringelsessteder og botilbud m.v. på socialområdet i forbindelse med håndtering af Coronavirussygdom 2019 (COVID-19)" (Consolidation act No. 1613 on the possibility to locally impose temporary visit restrictions at sheltered residences within the social area in connection with managing coronavirus disease (COVID-19)), available in Danish at: <https://www.retsinformation.dk/eli/lta/2020/1613>.

²⁶ Denmark, "Bekendtgørelse nr. 1030 om besøgsrestriktioner på plejehjem, plejeboliger og aflastningspladser samt sygehuse og klinikker i forbindelse med håndtering af Coronavirussygdom 2019 (COVID-19)" (Consolidation act No. 1030 on restrictions on visits to nursing homes, hospitals and clinics to manage coronavirus disease (COVID-19)), available in Danish at: <https://www.retsinformation.dk/eli/lta/2020/1030>.

²⁷ Denmark, "Bekendtgørelse nr. 1402 om ændring af bekendtgørelse om besøgsrestriktioner på plejehjem, plejeboliger og aflastningspladser samt sygehuse og klinikker i forbindelse med håndtering af Coronavirussygdom 2019 (COVID-19)" (Consolidation act No. 1402 on amending the consolidation act on restrictions on visits to nursing homes, hospitals and clinics to manage coronavirus disease (COVID-19)), available in Danish at: <https://www.retsinformation.dk/eli/lta/2020/1402>.

²⁸ Denmark, *Styrelsen for Patientsikkerhed*, "Besøgsrestriktioner" (Visit restrictions), available in Danish at: <https://stps.dk/da/sundhedsfare-og-beredskab/besoegsrestriktioner/>.

therefore sent a letter to all mayors in Denmark urging them to make sure that the consolidation act is enforced correctly in their respective municipalities.²⁹

According to the Danish Alzheimer Association (*Alzheimerforeningen*), the number of COVID-19-cases in nursing homes remained low in June and July 2020 when the government lifted visit restrictions. The Alzheimer's Association is worried that new visit restrictions and visit bans will result in severe health related consequences for nursing home residents and their relatives. The Alzheimer's Association criticises the rigid interpretation of visit restrictions and that restrictions have been interpreted differently by different nursing homes.³⁰

3.2 Ethnic minorities

Statens Serum Institut has released a report focusing on COVID-19 and ethnicity containing numbers from 7 September 2020. The report shows a higher rate of COVID-19 incidents among non-western ethnic minorities. At the time of the report, non-western ethnic minorities constituted 25,7 percent of COVID-19 cases but only 8,9 percent of the population.³¹

On 11 September 2020, The Danish Health Authority (*Sundhedsstyrelsen*) announced that it would enhance information regarding COVID-19 targeted at citizens with an ethnic minority background. New material with more graphic explanations has been made, and the material has been translated into more languages.³² Informational material about COVID-19 can be found in 19 different languages. Videos about COVID-19 have been translated into some languages like Arabic, Somali, Urdu and Farsi.³³ The authorities have also made an English webpage about COVID-19.³⁴ The Danish Health Authority (*Sundhedsstyrelsen*) has also established an expert group to advise it on how to communicate the new information to ethnic minority groups. The initiatives have been launched to counter the higher COVID-19 infection rates among ethnic minorities.³⁵

The Danish Institute for Human Rights (*Institut for Menneskerettigheder*) has previously reported on minority experiences of hate in public spaces during the COVID-19 epidemic. Therefore, the Institute recommended in a report from June 2020 that the government takes steps to create a national action

²⁹ Denmark, *Ældresagen*, "Besøgsrestriktioner på plejehjem/plejebolig" (Visit restrictions in nursing homes), available in Danish at: <https://www.aeldresagen.dk/presse/viden-om-aeldre/oevrige/2020-brev-borgmestre-besoegsrestriktioner-071020>.

³⁰ Denmark, *Alzheimerforeningen*, "Ophævelse af besøgsrestriktioner førte ikke til øget smitte på plejehjem" (Lifting visit restrictions did not cause a heightened contagion in nursing homes), available in Danish at: <https://www.alzheimer.dk/nyheder/2020/ophaevelse-af-besoegsrestriktioner-foerte-ikke-til-oeget-smitte-paa-plejehjem/>.

³¹ Denmark, *Statens Serum Institut*, "COVID-19 og herkomst – opdateret fokusrapport" (COVID-19 and ethnicity – updated focus report), available in Danish at: <https://files.ssi.dk/COVID19-og-herkomst-oktober-2020>.

³² Denmark, *Sundhedsstyrelsen*, "Sundhedsstyrelsen styrker informationen om COVID-19 til borgere med anden etnisk baggrund end dansk" (The Danish Health Authorities strengthen information on COVID-19 aimed at ethnic minorities), available in Danish at: <https://www.sst.dk/da/nyheder/2020/sundhedsstyrelsen-styrker-informationen-om-covid-19-til-borgere-med-anden-etnisk-baggrund-end-dansk>.

³³ Denmark, *Sundhedsstyrelsen*, "Information på andre sprog" (Information in other languages), available in Danish at: <https://www.sst.dk/da/corona/Yderligere-information/Information-paa-andre-sprog>.

³⁴ Denmark, *Sundhedsstyrelsen*, COVID-19 webpage in English: <https://www.sst.dk/en/English>.

³⁵ Denmark, *Sundhedsstyrelsen*, "Sundhedsstyrelsen styrker informationen om COVID-19 til borgere med anden etnisk baggrund end dansk" (The Danish Health Authorities strengthen information on COVID-19 aimed at ethnic minorities), available in Danish at: <https://www.sst.dk/da/nyheder/2020/sundhedsstyrelsen-styrker-informationen-om-covid-19-til-borgere-med-anden-etnisk-baggrund-end-dansk>.

plan against hate speech.³⁶ So far, the government has not taken any steps to create a national action plan or to introduce other measures to counter the hate speech that some minority groups experience during COVID-19.

³⁶ Denmark, *Institut for Menneskerettigheder*, "Had i det offentlige rum under COVID-19-epidemien – en analyse af minoriteters oplevelser" (Hate in public spaces during the COVID-19 epidemic – an analysis of minority experiences), available in Danish at: <https://menneskeret.dk/udgivelser/had-offentlige-rum-covid-19-epidemien-analyse-minoriteters-oplevelser>.