



Parallel report to the UN Committee on the Rights of Persons with Disabilities

31st Session

Submission from the national spokesperson for people with disabilities in Greenland

2024

Introduction

This document constitutes the parallel report of Tilioq to the UN Committee on the Rights of Persons with Disabilities with respect to the Periodic Review of the implementation of the Convention by the Kingdom of Denmark. We note that the breadth of challenges for persons with disabilities in Greenland is vast and we have been unable, within our resources, to address or illustrate the full diversity of issues. Nevertheless, we have highlighted some of the most central concerns, and are pleased to provide this parallel report to support the Committee in its work.

This report starts by introducing Tilioq and establishing the legal contours of the Greenland-Denmark relationship which is somewhat unique. It then responds to the list of issues released by the Committee in 2019.¹ It considers that the CRPD seeks to ensure and promote the full realization of *all* human rights and fundamental freedoms for all persons with disabilities without discrimination (Art 4). And that several provisions of the Convention acknowledge and rely on the “interrelation, interdependence, and indivisibility of all human rights” for their implementation.² As such, while focused on CRPD, Tilioq also references related human rights obligations outside the CRPD in this parallel report.

Our recommendations are directed to the Government of Greenland (Naalakkersuisut) and the Government of the Kingdom of Denmark as an expression to the Committee of where, in Tilioq’s view, reform needs to be made. We respectfully encourage the Committee to view these as suggestions for the Committee in the development and adoption of its own recommendations in due course. We stand ready to further assist the Committee in its work as needed.

About Tilioq

Tilioq is the national spokesperson organization for people with disabilities in Greenland. We were established by the Government of Greenland in 2017 to promote, protect, and monitor the implementation of the Convention of the Rights of Persons with Disabilities (CRPD) in Greenland. We bridge the gap between rightsholders and the government, supporting and guiding individuals regarding their rights as well as advocating for those rights when public authorities are not respecting, protecting, or fulfilling human rights obligations in accordance with the CRPD.

Tillioq has a wealth of knowledge on the implementation of the CRPD in Greenland, and it is from that knowledge that this report is drawn. We know where solutions are prospering as well as the areas which still need serious intervention to uphold the rights of persons with disabilities. Tilioq has five staff: the spokesperson, the secretariat leader, two project officers, and a civil advisor. Over the last seven years we have worked with a variety of stakeholders, including carers, social workers, tradespeople, case workers, civil society organizations, medical personnel, administrative decision-makers, politicians and most importantly the people who live with disabilities and their kin. Among our achievements has been bringing these people together under one roof, studying conditions of the land, faults and merits in various systems, processes, and mechanisms, and above all advocating for the rights of people with disabilities. We affect change both at a policy level and at an individual level for people with disabilities across Greenland. Although we are proud of

what we have achieved, our resources are stretched, and we cannot attend to all needs or requests for support - and the disability organizations in Greenland are currently very vulnerable and weak since they get no subsidies.

The legal context

It is important for the Committee to understand the legal arrangements within which Greenland sits. Greenland is not a state under international law. It is a self-governing territory within the Kingdom of Denmark. This is why the present report is prepared under the auspices of that provided by Denmark. It is also why Greenland has two seats within the 179 available within the Danish Parliament, and it explains how the legislation that gave Greenland self-government was necessarily adopted by a legislative act of the Danish Parliament.

The 2009 Act on Greenland Self-Government Act set out the portfolios for which Greenland is responsible.³ Those include, among others, health, property, law of capacity, family law, and food regulation. The Self-Government Act is testament to the right of self-determination of the People of Greenland. It does not, nor could it, confer any form of statehood to Greenland, and expressly left open the question of potential future independence for Greenland.

The same Act also established that the Government of Denmark provides the Greenland Self-Government authorities with an annual subsidy of just under 3.5 billion Danish kroner to be adjusted with inflation (and which last year was approximately DKK 4.1 billion).⁴ The annual subsidy is crucial for Greenland's economy, constituting about half of its public budget. Yet, from a human rights perspective, it is also remarkable that the amount is otherwise fixed and does not change in accordance with need. The effect is an overall double standard in human rights realization. Individuals enjoy one standard of human rights on the Danish mainland and another standard in Greenland, both of which fall within the state of the Kingdom of Denmark. The central, though not exclusive, cause of this disparity is a lack of adequate resources in Greenland. Although data on the specific consequences for persons with disabilities is scarce, that point that there is a paucity of resources in the various social welfare and health sectors in Greenland is not controversial, and there are statistics available which illustrate general discrepancies. For example, in 2020, researchers found that a person living in Greenland receives on average only about 65% of the equivalent health resources as someone living in Denmark.⁵ Given that Greenland is close to 90% Inuit, this situation is fundamentally at odds with the principle of non-discrimination.

As the UN Human Rights Committee has observed that the enjoyment of rights and freedoms on an equal footing, and in line with the principle of non-discrimination, "does not mean identical treatment in every instance."⁶ How human rights are realized in Greenland will often require different approaches than in Denmark. Greenland is geographically, culturally and linguistically distinct from Denmark, and our people are predominantly Inuit. We the Inuit are an Indigenous People expressly recognized as such by the Kingdom of Denmark.⁷ With due respect for our People, and principles of self-determination and free, prior, and informed consent, initiatives ought to be Greenland-led.

The suggestion that resources ought to flow more equitably from Denmark to Greenland where the need arises on human rights grounds, is not an invitation for Denmark to wrest authority back over any part of Greenland. This would contradict important principles of self-determination. Principles that, if respected, would advance human rights for people in Greenland. Rather, it is an invitation for Denmark to provide the

resources necessary to ensure that *all people* on the territory of the Kingdom of Denmark enjoy human rights effectively, and in line with the principles of equality and non-discrimination that form part of the very structure of its general international human rights obligations, and are also specifically constitutive of the CRPD.⁸ That is, where resources within Greenland are inadequate to meet human rights standards equal to that in the rest of the Realm, then absent widespread corruption or misuse of funds in Greenland (of which there is no evidence) Denmark must take steps to remedy the discrepancy by providing said resources at least to the degree required by the legal obligation. For instance, “to the maximum of available resources” for economic, social and cultural rights⁹ (which includes relevantly rights to work, to access education, food, housing, health, sports, non-interference with family life, and the continuous improvement of living conditions. The relevant resources are not limited to pure financial contributions but might also usefully include knowledge, personnel, and technology.

Tilioq recommends that:

1. Naalakkersuisut take concrete, targeted and measurable steps to promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and to promote respect for their inherent dignity.
2. Denmark provides material support over and above the block payment as necessary to realize human rights in Greenland to the same or measurably similar standard to that enjoyed in the rest of the Realm, based on principles of equity, and with full respect for the geographic, cultural, ethnic, linguistic, and epistemological specificity of Greenland.

Articles 1-4: Purpose and general

The Greenland Act on Support for Persons with Disabilities was adopted in 2019 and came into effect on 1 January 2020. It intends to implement the CRPD into the domestic jurisdiction of Greenland to the extent possible and refers to the Convention at several points. Although its adoption is a positive development, the legislation fails to fully incorporate the rights in the CRPD into Greenlandic law. Naalakkersuisut is taking some steps to integrate the Convention including through the development of an Action Plan. The “Action Plan for Compliance with the CRPD 2024-2034” was released for consultation in 2023. At the time of writing this report, the Action Plan has yet to be finalized or publicly released.

The draft Action Plan contains some promising points. For example, the vision to mainstream disability in all areas of policy and the increased effort to support disability-centered civil society organizations are encouraging. Tilioq is in many respects satisfied with the content of the Action Plan and its dedication to the CRPD. Where it fails, however, is in implementation. The draft Action Plan does not provide dedicated costs, targets, indicators, deadlines, nor does it plan for essential monitoring and evaluation.¹⁰ We hope to these factors addressed in the final version.

During the consultation process for the Action Plan, Tilioq requested that Naalakkersuisut¹¹ put an end to certain existing practices, such as the discharge of persons with disabilities from specialist care to either nursing homes or situations of inevitable homelessness. The draft Action Plan does not adequately address these suggestions nor others made by Tilioq. The visions of universal design and digitalization that we put forward, alongside improving the accessibility of basic communication, infrastructure and internet access, would advance accessibility and inclusion in schools, education, workplaces, public services, buildings, and transport infrastructure such as docks, ships, and airports.

As it stands now, an interdepartmental disability committee will present a report on the draft Action Plan to Naalakkersuisut in 2026, which will thereafter consider the report's recommendations. This programme of work is far too slow given the urgency of pressing issues. In addition, the Action Plan does not make it possible to measure compliance, as the terms are vaguely formulated. Adequate funds are not allocated to implement the Action Plan, which contains no financing or long-term investment plan, despite Tilioq, IPS (Greenland's Human Rights Council), and MIO (Greenland's spokesperson for children)¹² emphasizing the importance of dedicated funding in all our dialogues with the government. Overall, we note a general lack of inclusion of persons with disabilities and their representative organisations.

People with disabilities in Greenland and their immediate families are deeply frustrated by the myriad ways in which their rights under the CRPD are not realized, with implications for the entire extended family unit and broader community.¹³ Case processing is slow. The order in which cases are prioritized and resolved appears arbitrary. There is no specific support for persons with disabilities to enter the labor market. Obvious potential digital solutions are not available in Greenland because internet access is prohibitively expensive. For people with psychological disabilities or mental health challenges, the waiting times for diagnosis are so long that many suffer greatly. At the same time, there is very little data collection, indicators or benchmarks to assess the impact and results of the public policies designed for the implementation of the Convention, nor any of its terms that are yet to be implemented.

Tilioq Recommends that:

3. Naalakkersuisut ensures that the disability policy action plan includes specific priorities and goals, indicators, and a budget that reflects those goals and priorities that covers all essential sectors to meet its obligations under the CRPD, as well as mechanisms for ongoing and thorough monitoring, evaluation, follow-up, and review. Tilioq recommends quarterly reporting of implementation.
4. Naalakkersuisut ensures that the disability policy action plan indicates specifically the means with which data will be collected, analyzed, and used as evidence for future efforts and interventions, and establish mechanisms for follow-up and review. Such mechanisms must be in full compliance with Article 31 of the Convention, including privacy and ethical safeguards.

Naalakkersuisut recently released its long-awaited anti-discrimination law, cf. art. 2(b), which is positive in its sentiment but lacks scope and enforcement rigor. Although disability is included as a protected attribute, the law has failed to include any specific protections for persons with disabilities, and, among many things, does not mention ableism or universal design. In addition, in Tilioq's view, the enforcement mechanisms are weak, which overall hinders the Act's ability to effectively hinder discrimination. Also, the law does not address the right to reasonable accommodation and accessibility. Thus, it is unclear whether and to what extent the law protects these rights, which are fundamental rights according to the CRPD and should be clearly addressed and protected.

We continue to see discriminatory and regressive attitudes and language in other pieces of legislation. For example, the applicable criminal law in Greenland uses the phrase "mental retardation" eight times.¹⁴ The criminal law is formulated by the Danish Ministry of Justice and adopted by both the Danish Parliament and Naalakkersuisut. Consequently, it is the responsibility of the Danish authorities to ensure that the language and contents of the law are aligned with the CRPD. Nor have we seen any efforts to repeal discriminatory provisions of other legislation.¹⁵

In Greenland there are no legally binding frameworks nor formal institutionalized or systemic mechanisms to ensure close consultation with, participation of, and the active involvement of organizations of persons with disabilities in decision-making processes that affect them. That includes those concerning

implementation and monitoring of the Convention, preparatory studies about new legislation, and the amendment of laws and public policies.

Naalakkersuisut has consulted some civil society organizations on relevant legislative processes, but whether, how and with whom this happens is generally ad hoc, and does not always evidence that the expertise provided has been meaningfully incorporated into the legislative design, or if not, provide reasons why not. E.g. while Tilioq was consulted on the new Greenlandic law on support for people with disabilities in October 2023, recommendations it made about specific protection for persons with disabilities and the improvement of enforcement mechanisms within the law appear not to have been heeded. Our recommendations included the establishment of data collection and monitoring mechanisms, changing the payment system for the national rehabilitation center, as well as incorporating universal design into the legislation.

Greenland has a duty to consult with and actively involve persons with disabilities including children with disabilities, through their representative organizations, in the development and implementation of legislation and policies to implement the Convention and in other decision-making processes on issues that affect them (Article 4). To this end, there is a need for a more meaningful, systematic, and integrated approach to the participation of civil society in decision-making processes. They must be included as a matter of course. Since 2022, Tilioq has recommended that disability-focused NGOs ought to receive a fixed subsidy from government to enhance their stability and improve their opportunities to build internal structure and seek additional funding. Given the importance of the work they do, these organizations should be institutionally secure.

In 2014, Denmark ratified the Optional Protocol to the Convention on the Rights of Persons with Disabilities (CRPD) granting access to a communications procedure under its auspices. Denmark registered a territorial exclusion for Greenland. Tilioq questions the legal validity of that territorial exclusion (and indeed territorial exclusions to human rights conventions generally) and would welcome the Committee's views on this point. On the face of it, to exclude specified territory within a single state from the application of human rights norms or mechanisms is *prima facie* contrary to the basic human rights obligations of the state, particularly where the population of that excluded territory is predominantly a different ethnicity to the mainland population. In our view, that remains problematic from a human rights perspective even when the relevant excluded territory is self-governing, and especially when neither party disputes that the territory is not itself a state under international law (yet, perhaps).

Tilioq recommends that:

5. Naalakkersuisut incorporates the CRPD into Greenlandic legislation.
6. The Kingdom of Denmark, in consultation with Naalakkersuisut, withdraws the territorial exclusion for Greenland to the Optional Protocol or acknowledges its legal invalidity.
7. Naalakkersuisut adopts standard practice measures to facilitate the participation of persons with disabilities and their representative organizations in decisions which affect them. Participation should begin at the initial stages of any relevant decision-making, continue throughout, and be incorporated into follow-up and review.
8. Naalakkersuisut provides explanations whenever the recommendations made by persons with disabilities and their representative organizations are not adopted.
9. Naalakkersuisut ensure that representative organizations for persons with disabilities receive regular and reliable financial contributions to ensure the security of the work they do.
10. Naalakkersuisut provides training for staff in all public authorities about the principles and rights contained in the Convention and the obligations that come with it.
11. Naalakkersuisut initiate a systematic practice of screening new and existing legislation to ensure compliance with principles, rights, definitions, and concepts in the CRPD.

Articles 4: Case procedure, administrative justice and structural problems

The most common issues we hear are questions and complaints about administrative procedures.¹⁶ These often include stories about lengthy processing times, undocumented answers and no legal counseling on how to lodge a complaint. We know of several cases where a request for assistance has been lost or "forgotten" in the municipal systems. The Qeqqata Case¹⁷ is an example and reports from the Supervisory Authority¹⁸ and the Ombudsman show it is a general problem. According to Article 4 of the Convention, Greenland has an obligation for progressive realization of the rights that it contains, and to ensure people with disabilities enjoy the benefits they are entitled to according to the legislation. Among others, the Supervisory Authority, the Ombudsman and Tilioq have often expressed sharp criticism of the administration of the disability legislation. The municipalities' management of offers and services in the field of disability is in many cases contrary to the convention and legislation. The overall picture emerges year after year in Tilioq's referral analyzes and studies show that it is a structural problem. NIISIP's (Skilled Social Workers' Association in Greenland) study¹⁹ from 2022 reveals that only 77 out of 231 social worker positions in the municipalities are filled by a person who is a trained social worker and only few on the disability area, which enables a system within which rightsholders don't receive the support and services to which they are entitled.

Tilioq recommends that:

12. Naalakkersuisut initiates a long-term effort in collaboration with Tilioq, other representative organizations, and the municipalities to correct the problems with non-compliance with the social legislation in the municipalities. This must include boosting the economy in the disability area for the municipalities and general investments and restructuring.
13. Naalakkersuisut introduce a "One Entrance" or process coordinator, where a permanent contact person coordinates across departments and teams, to ensure consistency and easier access to support.
14. Naalakkersuisut establishes an administrative court to ensure that all people have access to effective legal remedies, cf. Article 13 of the Human Rights Convention (31).

Article 7 and 24 – Children and education

The education system is a pivotal context within which children with disabilities in Greenland face inequity. Building infrastructure of schools is often physically inaccessible. The children have little access to support and assistive technology to aid in their education. The creation of separate school classes dedicated exclusively to children with disabilities is often wrongly perceived as a cure-all, but the effects are not entirely beneficial. The teachers often lack requisite training and experience, and the curricula, teaching style, materials, and structure are not specifically tailored to the needs of the individual child. When poorly implemented and managed, separate classes can have the effect of excluding or segregating children with disabilities from their peer-group. As a result, absenteeism for children with disabilities is very high, and the child's ability to prosper in school is substantially diminished. Children with disabilities are also often exempted from final exams without alternative methods of examination provided.²⁰ Within the compulsory

education setting, this means that they do not graduate from school and are thus unable to continue to further education and makes it even more difficult to enter gainful employment. There is a huge lack of knowledge and lack of adaption of universal design for learning, and a lack of expectations, ambitions, and investment in children with disabilities.

There are some hopeful signs. In a meeting with Tilioq in January 2024, the Greenland Department of Health stated that part of their upcoming strategy would focus on early interventions, i.e. providing access to certain types of support for children who might need it, even before they have a specific diagnosis. Similarly, the Department of Children and Families invited Tilioq along with other relevant stakeholders to a workshop in June of 2024 that sought to find specific goals and commitments to support children as early as possible. These are promising developments that we hope to see developed and well implemented.

Overall, the education system in Greenland does not prepare a child with disabilities for an independent life, nor contribute to the development of the child's personality, talents, and mental and physical abilities to their fullest potential as required under the Convention on the Rights of the Child (Art 29). Many children with disabilities thus face numerous struggles simply entering adulthood on a similar footing to those without disabilities.

Tilioq recommends that:

15. Naalakkersuisut and the Department of Education initiate reforms within the education system in Greenland to ensure that it is premised on equity, inclusion, and fairness, including specifically for children with disabilities.
16. Naalakkersuisut and the Department of Education reform its approach so that it takes concrete, targeted, and measurable steps to ensure that children with all types of disabilities receive education in accordance with their rights under Article 7 CRPD and Article 23 of the Convention on the Rights of the Child.
17. Naalakkersuisut and relevant public and educational authorities ensure that all teacher training incorporates methods to prepare teachers to teach students with disabilities. This includes, but is not limited to, universal design for learning, training in inclusive teaching methods, the development of accessible teaching materials and curricula, and the use of technology. Ongoing training should be mandatory as part of continuing professional development.
18. Naalakkersuisut and the Department of Education establish and implement specific and targeted measures to ensure children with disabilities have the best opportunity to graduate from each level of schooling alongside their peers.
19. Naalakkersuisut ensures better support, special arrangements and higher education possibilities for people with disabilities in Greenland.

Article 8 – Awareness

Many people with disabilities in Greenland experience stigma, taboos, prejudice, and discrimination on the basis of their disability. Discrimination on the grounds of ethnicity is also common. Persons with disabilities and their families are impacted by subtle and more obvious racial tropes and stereotypes about Inuit that are pervasive in Denmark. This is notable because a significant proportion of healthcare service providers are short-term employees from Denmark, who arrive without any socio-linguistic or cultural appreciation training in relation to their work in Greenland. The discrimination persons with disabilities in Greenland

experience inhibits their capacity, and that of their families, from living their lives with dignity. There is a desperate need for more information, better resources, training, and awareness to ensure that everyone can hold space for people with disabilities.

Tilioq recommends that:

20. Naalakkersuisut consult with Tilioq, IPS (Greenland's Human Rights Council), MIO (Greenland's spokesperson for children), other relevant NGOs, and local governments, to develop and produce educational material on the rights of persons with disabilities, for different target groups. Such groups would include, but would not be limited to, educational institutions, the media, the labor market, the public, and municipalities—to raise awareness of and foster respect for the rights and dignity of persons with disabilities, to promote awareness of the capabilities and contributions of persons with disabilities, combat stereotypes, prejudices and harmful practices relating to persons with disabilities, better treatment, and less stigmatization of people with disabilities.
21. The Government of Denmark, led by experts appointed by the Government of Greenland, prepare and implement compulsory pre-departure training on Inuit culture, language, history for all persons from Denmark who travel to Greenland to work with persons with disabilities and their families.

Article 9 - Accessibility

Greenland's geography and the sparsity of its population renders accessibility inherently challenging and therefore demands specific and targeted investment and design. Greenland is an island of over two million square kilometers, with a population of only 57,000. Its landscape of snow, ice, mountains, and fjords, makes it hard to navigate for people with disabilities – especially those with physical disabilities. Snow and ice are present in most of the territory most of the year. There are no roads between towns and settlements, with transport only possible between them by air or sea.

Accessibility is, as the Committee acknowledges, a “vital precondition for the effective and equal enjoyment of different civil, political, economic, social and cultural rights by persons with disabilities”.²¹ In particular, in Tilioq's view, it is a precondition for people with disabilities to live a dignified and fulfilling life. Many persons with disabilities in Greenland are unable to enjoy such a life in part due to inability to move freely, to access places, services, sports and other leisure activities, and family events. Lack of accessibility restricts people from being able to live independently and participate fully and equally in society.

The design of housing, building, education, transport, communications, and other infrastructure still requires targeted and substantial investment to meet even the most basic requirements of the Convention. Buildings and infrastructure rarely comply with principles of universal design, and most lack even the most rudimentary accessibility tools, such as ramps. This is especially true in smaller settlements and more remote areas, where dwellings also often lack sewage systems, let alone disability access.²² Although internet service is universal in Greenland or close to, technology is expensive and often inaccessible, often making the digital environment unavailable to people with disabilities, inhibiting their access to information and community.

Contractors we have spoken to indicated that unless they are legally obligated to, they generally will not take steps to ensure accessibility in buildings or homes. This illustrates the need for meaningful investment and enforceable law that requires that everyone regardless of where they are and what disability they have, can move freely in the area in which they live, and access any place or service intended for use by the public, as

well as live in a home that meets their needs. Investment is important because cost is a real issue for infrastructure projects. Almost all construction materials must be imported. “Granite is abundant but too brittle for construction purposes, so it is still cheaper to build in Denmark (or even China) and transport the end result to Greenland than to build locally.”²³

Infrastructure design must be tailored to meet accessibility needs in a specifically Greenlandic culture and landscape. Pure transplantation of design from Denmark to Greenland might not always be physically or culturally safe, nor applicable in a Greenlandic environment. Improvements to communications infrastructure and the availability of technology are also imperative, so that people with disabilities can access and utilize communications and technology infrastructure, assistive technology, navigate the internet, and access information in a language and form they understand.

There are currently very few regulatory standards on accessibility for persons with disabilities, and a holistic approach in which the rights of persons with disabilities are mainstreamed has not yet been embraced. It is notable, for instance, that in the most recent consultation on potential legislation addressing support for people with disabilities, “the proposal deletes the applicable § 5 [which provided that] All public buildings and facilities must, as far as possible, be arranged in such a way that access and use of them is ensured for persons with disabilities.” The justification provided for the deletion of this provision is that “buildings and housing are not a social issue, but a building and housing issue.” To view buildings and housing as “not a social issue” misunderstands the consequential impact of their design and fails to adhere to a holistic approach. There is no reason that ensuring accessibility could not be mainstreamed into legislation, and thus appear in more than one place. Indeed, including accessibility and universal design in legislation addressing social issues is in fact an important policy message that recognizes the significant social impacts of inaccessibility.

Tilioq recommends that:

22. Naalakkersuisut adopt law requiring that a base level of accessibility and universal design must be ensured in new buildings and during renovations.
23. Naalakkersuisut ensures that more accessible and affordable houses following the principle of universal design are erected in all cities and settlements.
24. Naalakkersuisut adopts legislation and policy proscribing that all public businesses and institutions must have accessible websites in accordance with the Web Accessibility Guidelines.
25. Naalakkersuisut provides substantially subsidized data and Wi-Fi to persons with disabilities and their families. Qualification for subsidized access ought to be based on a defined and reasonable threshold, determined in consultation with persons with disabilities and their representative organizations. That might be household income, membership of a disability association, other factors or a combination of factors.
26. Naalakkersuisut ensure that any legislation or policies which affect the lives of persons with disabilities is also produced in an easy-read version to support collective understanding of relevant law by all peoples about whom the law concerns, and their relevant rights and responsibilities.

Article 11 – Situations of risk and humanitarian emergencies

The effects of climate change will continue to increase the frequency and intensity of extreme weather events e.g. landslide-triggered tsunamis and seasonal loss of sea ice.²⁴ These factors add to existing disaster risk management challenges in an extremely vast and sparsely populated territory. Persons with disabilities can be particularly susceptible to risk in the context of hazards.

Existing infrastructural challenges in both the built and telecommunications environment inhibit the capacity of persons with disabilities to get help in the immediate event of a disaster. Tilioq is aware that search and rescue teams are generally not trained to rescue people with disabilities. Persons with disabilities are not included in the National Emergency Plan for Greenland, nor in the local emergency plans of the municipalities. It is important that governments plan beyond the immediate aftermath of a hazardous event, and for the full recovery of communities and their resilience into the future.

People who are deaf or have hearing impairments are not taken into consideration in the alert systems and protocols and are unable to get direct information from relevant authorities. Planning, at the local level, and in consultation with those who would be affected, should occur in advance of foreseeable hazards.

Tilioq recommends that:

27. Naalakkersuisut redesigns the alert system to provide accessible and targeted emergency information to people with disabilities especially people with hearing impairments and people who are deaf.
28. Naalakkersuisut provide compulsory and recurring training for search and rescue teams to ensure they can safely rescue persons with disabilities.

Article 16 – Freedom from exploitation, violence, and abuse

Measures to protect people with disabilities from sexual abuse were substantially strengthened after a particularly disturbing case came to light in 2022. In September that year, a 23-year-old woman who resided full time in residential care, and could neither walk nor talk, unexpectedly gave birth to a child. She had been raped by a staff member of the institution in which she resided. This case received widespread media and policy attention²⁵ and prompted some policy changes in public care facilities (not private or municipal institutions). Naalakkersuisut commissioned independent reports on sexual abuse in care facilities by Ilisimatusarfik (the University of Greenland), and in April 2024 the Government proposed an amendment to the draft Action Plan to include protection from sexual abuse in institutional settings.

As much as Tilioq supports these efforts, we continue to observe major gaps in the policies and the Action Plan mentioned above that hinder the full protection of people with disabilities from exploitation, violence, and abuse. Most initiatives to date center knowledge as the most important element of preventing abuse.

The only suggested interventions in the Action Plan are sex education and sexuality policies at the care facilities. There is also a near-exclusive focus on sexual abuse in an institutional setting, ignoring other types of exploitation, violence, and abuse, and disregarding the other places where those things can take place, including the home. No interventions implement measurable safeguards to protect people with disabilities; none seek to provide adequate care to survivors of abuse; no efforts are tailored to children with disabilities, and no efforts to implement or enforce the national legislation that would protect all people with disabilities from harm.

Nalaakersuisut funds a mobile children's support institution, *børnerejseholdet*, which offers specific services to children have been abused. However, Tilioq understands that *børnerejseholdet* specifically excludes the possibility of providing support to children with disabilities, as to do so is beyond the institution's means. That exclusion is discriminatory and not in line with obligations under the CRPD, the Convention on the Right of the Child, nor the general principle of non-discrimination under human rights law.²⁶

Tilioq recommends that:

29. Naalackersuisut establish and implement binding safeguarding measures to protect people with disabilities in both care facilities (all of them) and elsewhere. There should be specific measures to protect children with disabilities.
30. Naalackersuisut ensure that the services provided through *børnerejseholdet* are accessible to children with disabilities.

Article 19 – Living independently and being included in the community

Many people with disabilities struggle to find adequate housing. Some are unable to access certain parts of their home, for example through lack of ability to climb stairs, which obviously hinders one's ability to live independently. Others are offered housing in care facilities that do not meet their needs and/or are not appropriate to their disability. For instance, it is not uncommon for young persons with disabilities to be offered housing in elder care facilities. Some people or families see no other choice but to move to Denmark as the facilities and institutions in Greenland are unable to support them to live independently.²⁷

Tilioq frequently and repeatedly hears that many persons with disabilities struggle to meet their basic needs, mostly through lack of or low income, and poor housing facilities. As outlined above, many adults with disabilities have taken early retirement. This has held their income at very low thresholds which have not risen despite increased costs of living. As such, a lot of people struggle to find adequate and affordable housing, leaving many homeless, squatting, or in poor, unsafe, or inadequate housing. Waiting lists for public housing in cities can be decades long, and housing for lower socioeconomic groups has not received planning priority.

Tilioq and Greenland's umbrella organization for persons with disabilities, NIIK (Nunatsinni Inuit Innarluutillit Kattuffiat), are concerned about many instances in which persons with disabilities, including children and young people, have been relocated away from their hometown, often to places thousands of kilometers away, or even to Denmark. With no roads or railways between towns, and prohibitively expensive telecommunications, the relocation of a loved one to another town can mean a significant loss of regular

contact and connection. Families often consent to the relocations reluctantly, and in circumstances where it is not entirely clear that the treatments, services or supports that would make staying at home possible are truly unachievable in the circumstances. In this report, we are referring to such relocations as involuntary". Involuntary relocations have well-documented deleterious consequences for persons with disabilities, as well as the lives and health of relatives, parents, siblings, broader family, and community. In Tilioq's view, is not in line with rights to family, and to live a life in dignity, to move anyone when they do not wish to be moved. It can be especially traumatizing for a child or young person and relocation should be an option of last resort.

In Greenland, treatment and support are offered based on what the institutions can provide, rather than the person's specific needs. This places the institution, rather than the person, at the center. Many people with disabilities who are placed in the 24-hour services do not have their needs met by the services available, which can do more harm than good and wastes resources. People who do not fit in and/or whose relatives are unable to help them are often left without adequate or appropriate support. The cumulative reality for many persons with disabilities is that:

- They do not receive treatment from the healthcare system.
- They do not receive support measures from the municipalities.
- They are not employed or rehabilitated.
- They often have no home, or they are in a home they cannot fully access.

Involuntary relocations potentially contravene rights to self-determination, liberty and security of person, non-interference with family and private life, and health, among others. For Indigenous Peoples, removal from territory can cause particularly egregious harms which have been well documented elsewhere. It is for this reason that the International Tribal and Peoples' Convention 1989 (ILO 169), to which the Kingdom of Denmark is a party provides not only that Indigenous Peoples shall not be removed from land which they occupy, but also that any removal shall be adequately compensated (Art 16). Tilioq is not suggesting that these relocations are necessarily without consent, but the Committee ought to be aware that relocation of Indigenous Peoples enjoys particular protections under international law precisely because of the damage it can cause.

Relocation to Denmark is a major upheaval. Among the families who do move, it is common that they face new challenges, experience a lack of help and forms of multiple discrimination in Denmark. It is well-documented that Greenlandic people are routinely subject to discrimination in Denmark,²⁸ where the way of life, culture, relationship to nature, lifestyle, and language are all completely different from that in Greenland. Although it is beyond the scope of this report to relay, Danish control of Greenland has included significant wrongs perpetrated against Inuit in healthcare settings on racist and paternalistic grounds,²⁹ and has caused mental, physical and collective harm, and residual intergenerational trauma.

It is also notable that, people with intellectual disabilities who have committed crimes are usually sent to Denmark to serve their sentences because the facilities in Greenland are not adequate meet their needs. Some researchers have queried whether this amounts to a form of double punishment in which people have not only lost their liberty but are also effectively "banished" from their homeland.³⁰

Solutions to many of these challenges lie in taking steps to ensure that persons with disabilities can continue to live close to their families and participate actively in society to the greatest degree possible. Measures to achieve this might begin with a thorough review of and improvement of conditions at institutions within Greenland that provide services to persons with disabilities, and opportunities for staff to receive further and additional training.

Tilioq recommends that:

31. Naalakkersuisut dedicate resources to accessible and affordable housing for people with disabilities, in line with the obligation to ensure economic, social, and cultural rights are realized to the maximum of available resources.
32. Naalakkersuisut raises the early pension rates to correspond with inflation.
33. Naalakkersuisut ensures treatment and support measures that are adapted to the concrete needs of the individual.
34. Naalakkersuisut invests in and encourages scientific research and data collection to better understand the needs of persons with disabilities in Greenland. Such research must be prioritized and designed in ways that is meaningfully taking into account the views of persons with disabilities and their families, as well as relevant representative organizations, and be grounded in participator human rights-based approaches.
35. Naalakkersuisut, in consultation with persons with disabilities, their representative organizations, and other relevant stakeholders, develop, and pass binding legal standards that ensure reasonable minimum accommodations in the homes of persons with disabilities that are tailored to the individual's needs as far as possible in their own town.

Article 25 – Health

Health outcomes in Greenland are poor for persons with disabilities who cannot access the necessary treatment, support systems, including accessibility measures, and assistive technology. There is inequity between urban and rural. People who live in rural settings and remote settlements face significant barriers in accessing the health that the Convention ensures.

For people with psychological disabilities, access to psychiatrists for diagnosis, medication, and assistive technology is a significant struggle. For most, the traveling team of psychiatrists is the only option, although it is difficult to get referral from a primary physician and they might also only be in town once or twice a year.

In 2022, the Ombudsman for Inatsisartut (the Parliament of Greenland) conducted its third inspection of the psychiatric ward (named A1) at Queen Ingrid's Hospital in Nuuk, which is the largest hospital in Greenland. The inspection was conducted in collaboration with the Danish Institute for Human Rights and DIGNITY - The Danish Institute Against Torture. The Ombudsman concluded that, while her overall impression of the ward and its staff was positive, it suffered serious challenges including, inter alia, recruiting and maintaining appropriately educated staff and ensuring financial viability. The Ombudsman was deeply concerned over whether the ward could fulfil its function if key staff become sick or leave, recruitment of new staff is unsuccessful, and the demand for psychiatric treatment remains high.³¹

Tilioq recommends that:

36. Naalakkersuisut and the Department of Health creates a plan for early detection of disabilities—especially psychological—and intervention to support the person with a disability as early as possible to ensure better health outcomes.
37. Naalakkersuisut establishes effective and comprehensive data collection, analysis, reporting, and evaluation strategies on health standards and outcomes for persons with disabilities.

38. Naalakkersuisut ensures a stable framework for recruitment, retention, and financial funding for Greenland's psychiatric hospital to ensure equitable access to health regardless of disability.

Article 26 – Habilitation and Rehabilitation

Pissassarfik is Greenland's National Rehabilitation Center. It offers some limited access to essential rehabilitation services for people with disabilities. This could be because the municipalities have reduced their financial support to facilitate stays at Pissassarfik as a cost-saving measure.³² This underscores the need for increased and consistent financial support from central government and the prioritization of disability services.

There is a need for supplementary opportunities for habilitation and rehabilitation – a two-week stay at the national disability center is not enough. To support persons with significant disabilities, the introduction of individual, relational solutions i. e. home training conducted at home with the help of relatives can create opportunities for people with disabilities to achieve their full potential. Besides the obvious advantage for the individual with disabilities, the scheme could also, at a minimum, ensure that more people can stay in their homes rather than moving to an institution.

Tilioq recommends that:

39. Naalakkersuisut ensure through legislation and policy that every person with a disability not only has a right to a range of potential individualized rehabilitation solutions, but also that those solutions are available. This means dedicating adequate resources to provide them and ensuring a streamlined pathway to their access.
40. Naalakkersuisut advance the development of initial and continuous training for professionals and staff, working in habilitation and rehabilitation services, and establishing quality control and customization measures.
41. Naalakkersuisut strengthen coordination between the health sector, social sector, and education sector.
42. Naalakkersuisut establish dedicated ongoing funding to expand the capacity of Pissassarfik and improve the availability of its services.
43. Naalakkersuisut ensure measurable quality requirements so that people with disabilities and their relatives are guaranteed the best possible treatment and help from the start.
44. Through reform, Naalakkersuisut must ensure that assessments and decisions on assistance must be made on the basis of the individual human being and the needs of the individual. This requires that finances are separated from visitation and operation, so that there is no compromise on professionalism and needs due to financial considerations and Budget compliance.

Article 27 – Work and employment

In June 2024, Tilioq hosted the Conference “Greenland Leaving No One Behind – Universal Design”. Among the discussions were some centered on the potential of universal design to grant access to the labor market. This is a necessary conversation because there is a clear lack of access to appropriate, gainful employment opportunities for persons with disabilities in Greenland. In 2023, there were 2457 people on early pension,³³ a prerequisite for which is that the person has a disability. Tilioq has spoken to many who see early retirement as the only option to get out of the complexity of navigating the public case management systems and the challenges associated with finding supportive employment, or trying to access education and training opportunities that are not well equipped to support persons with disabilities. Tilioq has heard from case workers from the municipalities who perceive early retirement as the best way to reduce their case portfolio. The system has thus enabled a structure in which the case workers are recommending early pension, and persons with disabilities are accepting that, rather than working together to pursue gainful employment, the consequence of which is to naturally widen the gap in employment for persons with disabilities.

Tilioq encourages the creation of bridges to the labor market with specially adapted schemes and wage subsidies. There ought to be support and training from job consultants with specialized knowledge of aids and adaptation of workplaces. Several initiatives could be established in close cooperation with e.g. the Greenland Business Council, Visit Greenland, NIIK and Tilioq. The idea would be to allow individual business to develop or adopt employment mechanisms that facilitate the inclusion of persons with disabilities in the workforce, in ways that best suit the business and are not administratively burdensome. There is a need for an individualized approach to employment efforts for people with disabilities themselves too, which involves need-based and flexible support that considers the individual's situation rather than focusing on fixed benefit groups. The introduction of Citizen Directed Personal Assistance (BPA) could give people with disabilities control over their support.

With the right support, many people with disabilities can pave their way into the labor market themselves but would benefit from targeted job search courses for people with disabilities. However, this cannot stand alone. There is a need to create new types of jobs such as through a 'job carving' approach in collaboration with employers. There should also be a strengthened focus and framework for support for onboarding and retention of staff with disabilities, as well as increased advice for hiring managers. In addition, employees and employers point to the potential for 'outplacement' when the employer/employee match is not successful or for those who feel locked in their jobs.

Tilioq recommends that:

45. The Greenland Department of Social Affairs, Families, Labor and Home Affairs in collaboration with Majoriaq creates targeted initiatives aimed at supporting people with disabilities to seek and obtain gainful employment. These include access to part-time work, assistive tools and technologies, flexible hours and other such approaches.
46. That Nalaakersuisut encourage private sector employers to invest in disability friendly and inclusive employment practices, including the incorporation of access to part-time work, assistive tools and technology, flexible hours, and other such approaches.
47. Naalackersuisut facilitate the establishment of initiatives to support business facilitate access to the job market for people with disabilities.

48. Nalakkersuisut work with representative organizations of persons with disabilities, and appropriate employer organizations, businesses, and other relevant stakeholders to create new jobs and employment mobility.
49. Nalakkersuisut consider the following business support initiatives to bring more people with disabilities into the economy via work or self-employment:
- (a) To increase the labor supply, current early pensioners must have the opportunity to earn a specified amount without having their early pension deducted.
 - (b) Companies must have the opportunity to obtain tax relief by investing in adapting the workplace or work processes so that they enable people with disabilities to do the work.
 - (c) Mentor Schemes - which support the employed person with a disability. A variation on the mentor scheme could be personal assistance at the workplace. This could be done by freeing up some hours from an existing employee. It should be avoided that the personal support person is involved in the working relationship.
 - (d) Flexible employment understood as an adaptation of a role so that it matches company needs with the individual person with a disability's opportunities. These are not necessarily "permanent positions" for people with disabilities, but an individually adapted job relationship. The flex job scheme could also cover pilot courses where people with disabilities are paid "per task" instead of on an hourly basis - as such a contract provides flexibility in working hours and organization of work.

Article 30 – Participation in culture, recreational activities, leisure and sports

Nature and culture are crucially important in Greenland but also highly inaccessible for persons with disabilities, who often feel that they are not part of the Greenlandic way of life. Many people who experience disabilities late in life have lamented that they must give up hunting or fishing, which has been their way of living and their livelihood. This is a great loss of identity. In Greenland especially, access to nature is decided by your physical functionality as well as your resources. Measures to implement Article 30 should therefore be culturally appropriate given that most of the population in Greenland identify as Inuit. Measures Tilioq is keen to encourage include those that combine empowering Indigenous People while also strengthening connection to culture and nature such as through dog sledging or fishing. This was also mentioned in the most recent report of the UN Special Rapporteur on the Rights of Indigenous Peoples on his visit to Denmark and Greenland.³⁴

Persons with disabilities are entitled to occupy space in the world of sports, including Para Sport and elite sports for people with disabilities. In Greenland people with disabilities, especially children and young people, are almost completely excluded from the world of sport and therefore also the communities it creates. They experience a higher degree of loneliness, discrimination, and unequal conditions. There is only one sports team for children with disabilities in Greenland and only few spacious sport teams. There are no Para Sport or opportunities for elite athletes with disabilities, which contrasts with other countries where such initiatives thrive. Lack of sports activities makes it difficult to find places to go and mechanisms through which to participate in society. Children with disabilities in particular miss out on mentorship that naturally arises through sports, which can reinforce experiences of loneliness and isolation.

Where governments adopt measures for inclusion in sports, Para Sport and Para athletes, they strengthen resilience on an individual and community level. Such measures create stronger communities and improved

human outlook, national pride and can lead to increased participation in elite sports. Feelings of inclusion and membership that come with participation in sports can combat loneliness and bullying and improve mental and physical health, improving quality of life and opportunities, especially for children and young people with disabilities. The participation of persons with disabilities in sports also reduces discrimination by promoting a more positive and inclusive view of people with disabilities.

Tilioq recommends that:

50. Naalakkersuisut establishes funding to support strengthening the connection to culture and nature for people with disabilities.
51. Naalakkersuisut adopts initiatives to promote understanding of the importance of inclusion and spaciousness in sport and to initiate launching of Para Sport and elite sports for people with disabilities and support opportunities for them.
52. Naalakkersuisut establish dedicated ongoing financial funding to support Para Sport and to secure to financially fund long-term sporting planning for athletes and their coaches.

Concluding observations

This comprehensive assessment has underscored persistent challenges in ensuring the full realization of the rights of people with disabilities in Greenland. While commendable efforts have been made by Naalakkersuisut in drafting legislation and action plans broadly aligned with the CRPD, critical gaps remain in their substance, implementation and enforcement.

Throughout this report, Tilioq has highlighted the urgent need for concrete action to bridge these gaps, particularly in areas such as accessibility and universal design, access to adequate services, education, habilitation and rehabilitation, healthcare, employment, sport and community participation, and protection from discrimination, exploitation and abuse. These issues, when left unaddressed, not only infringe upon the rights and dignity of individuals with disabilities but also perpetuate systemic inequalities within Greenland. Moreover, the lack of comprehensive data and analysis further complicates efforts to monitor progress and tailor interventions effectively.

Tilioq urges Naalakkersuisut to prioritize the holistic implementation of the CRPD, with a strong emphasis on cross-sectoral collaboration, meaningful support and inclusion of civil society, and proactive measures to address the specific needs and challenges faced by individuals with disabilities. By taking decisive action in these areas, Greenland can create a more inclusive and equitable society where the rights of all its people are upheld and respected.

Our recommendations have centered around four key pillars for reform:

- **Legislative Reforms:** Naalakkersuisut and Inatsisartut should ensure that legislation and initiatives in the field of disability are long-term and adopted with a broad majority to avoid politicization across election periods. Considering the rights of persons with disabilities should be mainstreamed into legislative drafting and reform and supplemented by specific initiatives.

- **Financial Support:** Ensuring stable financial support for initiatives to support the realization of all the commitments under the Convention, as well as specifically for representative organizations for persons with disabilities in Greenland.
- **Digital Solutions:** Effective use of digital solutions provides increased opportunities for people with disabilities to participate more actively in society and develop personally, provided that these correspond with the Web Accessibility Guidelines.
- **Data.** There is a need to establish robust mechanisms for ethical data collection, analysis, and reporting to inform evidence-based and human rights-centred policymaking and to ensure accountability.

Fundamentally, there is a need for a change in human perception. We must help spread an inclusive view of humanity which emphasizes the need to see all people as valuable regardless of their functional ability. Today, people with disabilities are "not seen"; many live isolated lives, are lonely, and do not have the opportunity to participate in culture, school, work, sports, or enjoy Greenland's breathtaking nature. Disability associations have had very limited opportunities to inform, gather, and support people with disabilities, which has huge consequences for individuals, families, Greenland, and its economy.

Conclusion

Tiliq urges the Committee to encourage Naalakkersuisut to initiate reform of its approach to realizing the rights of persons with disabilities in Greenland, to focus on investment and initiatives that fulfil its human rights obligations, with resource support from Denmark as needed.

Supporting persons with disability to live dignified lives is part of sustainable development and leaving no one behind. A central tool in realizing this endeavor is that Naalakkersuisut mainstream universal design in all its forms. By ensuring that people with disabilities are considered and that their rights are respected, Greenland can build a more inclusive and equitable society for the benefit of society as a whole.

Endnotes

- ¹ Committee on the Rights of Persons with Disabilities, *List of issues prior to submission of the second and third periodic reports of Denmark* (30 April 2019) UN Doc CRPD/C/DNK/QPR/2-3
- ² Committee on the Rights of Persons with Disabilities, *General Comment No 5 (2017) on living independently and being included in the community* (27 October 2017) UN Doc CRPD/C/GC/5 para 7.
- ³ Self Government Act 2009 (Denmark) available in English along with the letter transmitting the act to the UN Secretary-General here: <https://www.stm.dk/media/11338/10-notifikation-af-7-oktober-2009-til-fn-s-generalsekretaer-om-selvstyreloven.pdf>
- ⁴ Self Government Act 2009 Ch 3 s 5(1).
- ⁵ T. Kue Young, Ann Ranghild Broderstad, Yury A. Sumarokov, and Peter Bjerregaard, 'Disparities Amidst Plenty: A Health Portrait of Indigenous Peoples in Circumpolar Regions' (2020) 79(1) *International Journal of Circumpolar Health* 1, 6.
- ⁶ UN Human Rights Committee, General Comment 18: Non-Discrimination (1989) para 8.
- ⁷ 2009 Act on Greenland Self-Government (Denmark) Preamble; and Convention No. 169 on Indigenous and Tribal Peoples in Independent Countries, opened for signature 27 June 1989, 1650 unts 383 (entered into force 5 September 1991), Declaration in Relation to Convention No. 169, Order no. 97 of 19 October 1997 of the ilo Convention no. 169 of 28 June 1989 (bki nr 97 af 09/10/1997 Erklæring i forbindelse med ratifikation af ilo-Konventionen Nr. 169 af Oprindelige Folk og Stammefolk i Selvstændige Stater), para. 1.
- ⁸ CRPD Art 3.
- ⁹ CRPD Art 4(2); International Covenant on Economic, Social, and Cultural Rights, Art 2(1).
- ¹⁰ Committee on the Rights of Persons with Disabilities, *List of issues prior to submission of the second and third periodic reports of Denmark* (30 April 2019) UN Doc CRPD/C/DNK/QPR/2-3, para 2(c).
- ¹¹ Tilioq, *Handicaptalsmandsinstitutionen Tilioqs høringsvar til forslag til "Handlingsplan for efterlevelse af FN's Handicapkonvention 2024-2034"* (2023). <https://www.tilioq.gl/videnscenter/tilioqs-publikationer/?category=h%C3%B8ringssvar>
- ¹² MIO [Greenland's spokesperson organization for children], IPS [Greenland Human Rights Council] and Tilioq, 'MIO, IPS og Tilioqs 18 forslag til fokuspunkter i den nationale handlingsplan for efterlevelse af FN's handicapkonvention' [MIO, IPS and Tilioq's 18 proposals for focus points in the national action plan for compliance with the UN disability convention] (12 April 2023) and can be made available to the Committee upon request.
- ¹³ Tilioq, *Institutioner i forfald: Analyse af Tilioqs borgerhenvendelser fra 2022* (2023). <https://www.tilioq.gl/videnscenter/tilioqs-publikationer/?category=analyser>
- ¹⁴ Lovtidende A, *Bekendtgørelse af kriminallov for Grønland* <https://www.retsinformation.dk/eli/ta/2017/1045/Pdf> (12. september 2017)
- ¹⁵ Committee on the Rights of Persons with Disabilities, *List of issues prior to submission of the second and third periodic reports of Denmark* (30 April 2019) UN Doc CRPD/C/DNK/QPR/2-3, para 3(b).
- ¹⁶ Tilioq, *Institutioner i forfald: Analyse af Tilioqs borgerhenvendelser fra 2022* (2023). <https://www.tilioq.gl/videnscenter/tilioqs-publikationer/?category=analyser>
- ¹⁷ Ombudsman for Inatsisartut [Ombudsman for the Parliament of Greenland], '2022-4 Qeqqata Kommunias håndtering af sag om støtte til et barn var uantagelig' [Qeqqata Commune's handling of a case of support for a child was unacceptable] (27 October 2023) <https://www.ombudsmand.gl/sager/2022>

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¹⁹ <https://knr.gl/da/nyheder/kun-hver-tredje-social%C3%A5dgiver-er-uddannet-til-jobbet>

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²² Report of the Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes on his mission to Denmark and Greenland (14 November 2018) para 76.

²³ Report of the UN Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes on his mission to DENMARK and GREENLAND: comments by Greenland (11 September 2018) <https://documents.un.org/doc/undoc/gen/g18/273/61/pdf/g1827361.pdf?token=DZDVJZasiAhWxcdhuS&fe=true> para 33.

²⁴ Naalakkersuisut, 'Consultation regarding the proposal for an Inatsisartut Act on support for persons with disabilities' (23 April 2024) https://naalakkersuisut.gl/Hoeringer/2024/04/2304_stoette_handicap?sc_lang=da#:~:text=Form%C3%A5let%20med%20lovforslag%20er%20at,v%C3%A6rdigheden%20hos%20personer%20med%20handicap.

²⁵ Greenland Human Rights Council, Tilioq, and the Danish Institute for Human Rights, *Beskyttelse mod seksuelle overgreb på bo – og døgntilbud i grønland* (2023).

²⁶ Miriam Cullen, Benedicte Sofie Holm, Céline Brassart-Olsen, 'Displacement, Relocation, and the Legacies of Colonialism: A Human Rights-Based Approach to Disaster Risk Management in Greenland' (2024) *Yearbook of International Disaster Law* 77, 77.

²⁷ Which is a general principle of international human rights law and Article 2 of both the ICCPR and the ICESCR (see further UN Committee on Civil and Political Rights, General Comment 18, Non-Discrimination (1989). See list of issues, para 18(b).

²⁸ See, for example, Danish Institute for Human Rights, *Ligebehandling af Grønlandere i Danmark* [Equal Treatment of Greenlanders in Denmark] (2015); Danish Institute for Human Rights, *Need for a Coordinated Effort for Equal Treatment of Greenlanders in Denmark* (2023) <https://www.humanrights.dk/publications/need-coordinated-effort-equal-treatment-greenlanders-denmark>.

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³⁰ Rømer, Mette, og Annemette Nyborg Lauritsen. "Fra nedsendt til bortdømt - om Grønlands psykisk syge foranstaltningssdømte i Danmark". *Social kritik*, 2023.

³¹ Inspektionsrapporter fra 2023, <https://www.ombudsmand.gl/inspektionsrapporter/2023>

³² Pissassarfik, *Statistik over borgerforløb* (2023) https://pissassarfik.gl/emner/forloeb ved pissassarfik/statistik forloeb?sc_lang=da

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³⁴ See: <https://www.internationaldisabilityalliance.org/content/indigenous-persons-disabilities-global-network> and https://www.un.org/en/ga/69/meetings/indigenous/pdf/IASG%20Thematic%20Paper_Disabilities.pdf