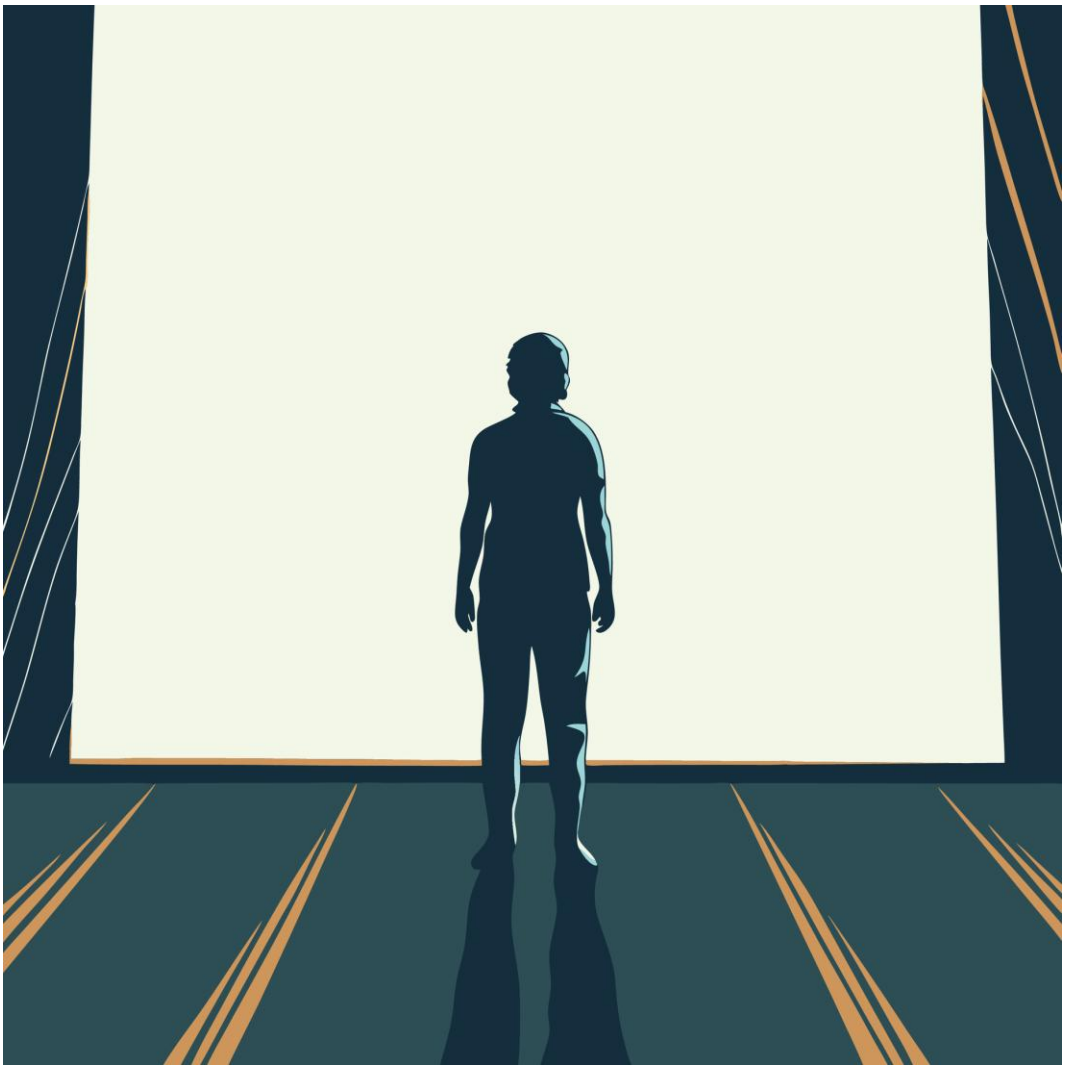
DANISH REFUGEE COUNCIL

RECOMMENDATIONS

June 2025 – Copenhagen, Denmark

DRC recommendations on the proposed Return Regulation



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Content

Reform of the EU return system

In March 2025, the European Commission presented a proposal for a reform of the 2008 Return Directive[1], in the form of a Return Regulation[2]. Although prescribed in the European Commission's better regulation agenda, the proposal for the Return Regulation does not include an impact assessment that could help determine whether the proposal will achieve its objectives.

Denmark applies the Return Directive, and the Danish return system is often being highlighted for being efficient in ensuring return. Danish Refugee Council (DRC) has been providing legal aid to asylum seekers for many years, and in Denmark, DRC also offers counselling on return and reintegration to rejected asylum seekers.

To DRC, the Danish return system includes some positive elements, such as access to accommodation, higher reintegration assistance than the Frontex level, and impartial return counselling, as well as good cooperation between the authorities and legal aid providers. But the Danish return system also represents a punitive approach to return, which has severe and negative impact on people in the return procedure. The political aim to "motivate" rejected asylum seekers to leave is enforced with the use of punitive measures and harsh sanctions for non-compliance.

The proposed Return Regulation also aims to increase returns with the use of punitive measures and criminalization of rejected asylum seekers, which to DRC undermines human dignity and does not encourage voluntary or accepted return.

With this paper, DRC aims to contribute to the current negotiations on the proposed Return Regulation between the European Parliament and the Council. The paper includes DRC's key recommendations on the proposed Return Regulation as well as DRC's reflections on the Danish return system, because we are concerned that the punitive elements can be copied with the proposed Return Regulation. The analysis and recommendations are based on DRC's work with rejected asylum seekers in Denmark and reflections on the Danish return system.

"Accepted return"

Return is often described as being either "voluntary" or "forced", but in practice the process usually falls in a grey area. For rejected asylum seekers in the EU, return is rarely voluntary given that they have applied for international protection and have had their claim refused. As such, it is rather a result of limited options. Recognizing the limitation in choices, DRC uses the term "accepted return" instead of "voluntary return" to reflect the influence of legal orders and potential sanctions.[3]

[1] Directive 2008/115/EC of the European Parliament and of the Council of 16 December 2008 on common standards and procedures in Member States for returning illegally staying third-country nationals.
[2] Proposal for a regulation of the European Parliament and the Council establishing a common system for the return of third-country nationals staying illegally in the Union, and repealing Directive 2008/115/EC of the European Parliament and the Council, Council Directive 2001/40/EC and Council Decision 2004/191/EC.
[3] DRC, DRC Return Policy, October 2018.

DRC's key calls for the proposed Return Regulation

Protection against *refoulement* (art. 25 and 28)

- All asylum seekers must have access to fair and efficient asylum procedures that extend to the return decision. Identification of vulnerabilities, access to free high-quality and independent legal assistance and representation, as well as automatic suspensive effect of appeal are necessary procedural safeguards.
- **DRC recommends** that essential safeguards during the return procedure include identification of vulnerabilities, access to free high-quality and independent legal assistance and representation without having to make a separate request, as suggested in art. 25, as well as automatic suspensive effect of appeals without having to make a separate request, as suggested in art. 28.

No mutual recognition of return decisions and solutions for people who cannot be returned (art. 7 and 9)

- As long as the national asylum systems have very different capacities and qualities, resulting in diverse recognition rates, the EU Member States should not mutually enforce return decisions.
- **DRC recommends** that the proposed obligatory mutual recognition of return decisions between the EU Member States in art. 9 should be deleted. There should be solutions for people, who – for reasons beyond their control – cannot be returned, such as dignified living conditions and an extended possibility to regularize their stay compared to the current possibility under art. 7(9).

Forced return should be avoided (art. 13)

- Rejected asylum seekers should get support to accept the return decision and leave voluntarily as forced return undermines human dignity.
- **DRC recommends** that accepted or voluntary return is encouraged by making the time limits flexible and based on individual needs rather than the proposed limitation to the time limits in art. 13.

Ensure access to impartial counselling and meaningful reintegration support (art. 46)

- Meaningful and sufficient assistance can help support dignified return and sustainable reintegration. Access to assistance should not be limited due to non-compliance during the return procedure.
- **DRC recommends** for access to return and reintegration assistance to be based on individual needs rather than the level of cooperation and compliance during the return procedure as suggested in art. 46.

Harsh sanctions for non-compliance should be avoided (art. 22)

- The use of sanctions and detention to "motivate" return must be avoided as it undermines human dignity. At the same time, punitive measures are ineffective as a motivational tool. All decisions about non-compliance should be fair and transparent.
- **DRC recommends** the deletion of art. 22 or alternatively that decisions about consequences of non-compliance as suggested in art. 22 are formalized to ensure transparency about the assessment and allow rejected asylum seekers to complain against these decisions with free legal assistance.

Standards of living should be dignified and avoid detention (art. 30, 32-35)

- It is not a crime to ask for international protection, and the use of detention should be limited to situations where it is necessary and proportionate. Detention can never be in the best interests of the child. Detention does not support dignified return for rejected asylum seekers as it does not constitute dignified and adequate standards of living.
- **DRC recommends** not expanding the grounds for detention as suggested in art. 29 and 30, and that the possibility to detain children and families under art. 35 is deleted. The detention period should not be extended beyond the current maximum of 18 months as suggested in art. 32. The review of the detention order should take place automatically every four weeks instead of every three months as suggested in art. 33. Detention should take place in specialized facilities, not in prisons as suggested in art. 34.

"Return hubs" should not be introduced (art. 4 and 17)

- Schemes aimed at outsourcing responsibility for return of rejected asylum seekers to third countries contain risks of human rights violations. Return hubs can become "zones of exemption", where fundamental rights are not respected, and people cannot access necessary services.
- **DRC recommends** the deletion of the proposed possibility to allow EU Member States to remove rejected asylum seekers to a third country with which there is an agreement or arrangement in art. 4(3)(g) and art. 17.

DRC's key recommendations on the proposed Return Regulation

To DRC, a well-functioning return procedure is part of a well-functioning asylum system that safeguards the principle of *non-refoulement*. It is paramount that all asylum seekers get access to fair and efficient asylum procedures, and that those who need it are granted international protection.

If a claim for asylum is rejected and no other options for protection or residency are available, there should be a dignified return procedure, which allows the individual person sufficiently time to make informed decisions about the future and take part in return arrangements. With the introduction of sanctions for non-compliance and the increased grounds for detention, the proposed Return Regulation represents a punitive and criminalizing approach to rejected asylum seekers. Such an approach is undignified, and it does not support voluntary or accepted return.

The Danish return system already includes punitive measures such as restrictions on the activities of rejected asylum seekers and harsh sanctions for non-compliance. In addition to being expensive for society, this approach has a negative impact on people as it makes people inactive and less able to engage in the return procedure.

The political aim to speed up procedures and use punitive measures to "motivate" rejected asylum seekers to return rarely works. On the contrary, DRC has experienced how harsh sanctions linked to return procedures can make rejected asylum seekers feel frustrated because the treatment is not dignified, which hinders them in engaging in the return procedure. To ensure dignified return and encourage voluntary return, sanctions and the use of force should be avoided. Instead, rejected asylum seekers need time, counselling, and support to be empowered to make informed decisions about their future.

Protection against refoulement (art. 25 and 28)

The proposed Return Regulation limits access to legal assistance and representation in relation to the return decision by the formalities of a request to the authorities (art. 25). The suspension of the enforcement of a return decision also depends upon a request (art. 28). The definition of vulnerable persons of the Return Directive has been deleted.

With the EU Pact, decisions on asylum and return will become closely linked, which is already the practice in Denmark. For return to be safe, all asylum seekers must have access to fair and efficient asylum procedures. Applications for asylum must first be examined in accordance with international refugee law and equivalent national legislation through transparent, effective, and fair procedures with safeguard and appeal options that protect the individual from arbitrary treatment and refoulement.

The protection against *refoulement* extends to the return procedure and makes it paramount to ensure the necessary safeguards such as access to free legal aid and automatic suspensive effect of appeal. It is also essential that vulnerable people are identified to ensure that they get adequate support.

DRC recommends that essential safeguards during the return procedure include identification of vulnerabilities, access to free legal assistance and representation without having to make a separate request, as suggested in art. 25, and conducted by well-trained and independent legal actors. Suspensive effect of appeals should be automatic to safeguard the principle of non-*refoulement*, instead of having to make a separate request, as suggested in art. 28.

Identification of vulnerabilities

Art. 3(9) in the current Return Directive includes a definition of "vulnerable persons". This definition has not been retained in the proposed art. 4 of the Return Regulation although vulnerability is mentioned several times throughout the proposal. Identification of vulnerability is an essential safeguard to ensure that people can meaningfully engage in the procedure by getting adequate access to the special procedures.

DRC thus supports the proposal by ECRE to include a new article in the Return Regulation to ensure that vulnerabilities are identified.

DRC recommendation for a new art. 4(a)

As proposed by ECRE[4], DRC calls for a new article to be added to ensure that vulnerable persons get the support they need.

New art. 4(a) Vulnerabilities
1. Where relevant, it shall be assessed whether a third-country national in a return procedure is in a vulnerable situation, a victim of torture or has special needs or needs special procedural guarantees as within the meaning of the Reception Conditions Directive and Asylum Procedures Regulation.
2. Where there are indications of vulnerabilities, special needs or procedural guarantees, the third-country national concerned shall receive timely and adequate support in view of their physical and mental health. In the case of minors, support shall be given by personnel trained and qualified to deal with minors, and in cooperation with child protection authorities.

High-quality, independent, and free legal assistance and representation

Similar to the new Asylum Procedure Regulation, the access to legal assistance is dependent on a "request" by the rejected asylum seeker (art. 25). The EU Member States can decide to "exclude" access to free legal assistance and representation, e.g. if the rejected asylum seeker has "sufficient resources to afford legal assistance and representation" or "the appeal has no tangible prospect of success or is abusive".

Provisions of legal aid support a well-functioning asylum and return system. This includes both providing legal counselling to people tailored to their individual situation and ensuring that procedural guarantees are respected during the procedure. It is important that legal assistance and representation is of high-quality and provided by independent and impartial legal actors.

Limiting access to free legal aid can hinder access to a fair and efficient examination of a case and essentially risk *refoulement*. Further, introducing extra steps in the procedure to assess applicability of criteria for free legal aid, risk becoming cumbersome for the judicial system. Such resources are better used for examining the case on the merits.

[4] ECRE, ECRE Comments Paper: Proposal for a Return Regulation, June 2025, page 14.

DRC recommendation on art. 25

DRC calls for the EU Member States to automatically provide access to high-quality, independent, and free legal assistance and representation, in line with the proposal by ECRE.[5]

Art. 25 Legal assistance and representation
1. In the case of an appeal or a review before a judicial authority in accordance with Article 27, Member States shall, ~~**at the request of the third-country national,**~~ ensure that free legal assistance and representation is made available ***without any delay*** ~~**as necessary**~~ to ensure the right to an effective remedy and fair trial.
2.~~**Unaccompanied minors shall automatically be provided with f**~~*F*ree legal assistance and representation ***shall be provided automatically***.
3.The legal assistance and representation shall consist of the preparation of the appeal or request for review, including, at least, the preparation of the procedural documents required under national law and, in the event of a hearing, participation in that hearing before a judicial authority to ensure the effective exercise of the right of defence. Such assistance shall not affect any assistance provided for under Regulation (EU) 2024/1348.
4.Free legal assistance and representation shall be provided by legal advisers or other suitably qualified persons, as admitted or permitted under national law, whose interests do not conflict or could not potentially conflict with those of the third-country national.
Delete art. 25(5)-(9).
10.Member States ~~**may**~~ ***shall*** provide for free legal assistance and representation in the administrative procedure in accordance with national law.

Automatic suspensive effect of appeals

The aim of an appeal is to ensure review of a first instance decision and thus essential to ensure protection against *refoulement*. In Denmark, a good practice is that asylum applications in the regular procedure automatically are appealed in case of a rejection in first instance. All rejected asylum seekers are given a lawyer that can represent them during the appeal procedure.

In the proposed Return Regulation, rejected asylum seekers must ask for the suspensive effect of the appeal, which seems like an unnecessary requirement as they usually would require legal assistance, which could be difficult to get within the short timelines. Such additional steps make the procedure complex and overly bureaucratic, thereby demanding additional resources from the judicial system, which could be better used for assessing the case.

DRC recommendation on art. 28

DRC calls for all appeals to have automatic suspensive effect, in line with the proposal by ECRE.[6]

Art. 28 Suspensive effect
1.The enforcement of the decisions issued pursuant to Article 7, Article 10 and Article 12(2) shall be suspended until the time limit within which they can exercise their right to an effective remedy before a judicial authority ~~**of first instance**~~ referred to in Article 27 has expired.
2.(new) All subsequent appeals allowed in national law should have suspensive effect.
Delete Article 28(2)-(4).

[5] ECRE, ECRE Comments Paper: Proposal for a Return Regulation, June 2025, page 43.
[6] ECRE, ECRE Comments Paper: Proposal for a Return Regulation, June 2025, page 46.

No mutual recognition of return decisions and solutions for people, who cannot be returned (art. 7 and 9)

The proposed Return Regulation introduces an obligation for the EU Member States to mutually recognize return decisions (art. 9), which is registered as a European Return Order (art. 7).

The obligatory mutual recognition of return decisions is concerning as the national asylum systems are not harmonized. The capacity and quality of the asylum systems in each EU Member State varies substantially, and there is risk of *refoulement* if an EU Member State must enforce a return decision on behalf of another EU Member State without an additional judicial review.

While the proposed Return Regulation focus on increasing returns, there is still a need to ensure that people who cannot be returned – for reasons beyond their control – are provided with the necessary solutions, such as dignified living conditions and possibility to regularize their stay.

DRC recommends that the proposed mutual recognition of return decisions between the EU Member States in art. 9 is deleted and that people who cannot be returned are given the opportunity to regularize their stay rather than staying in limbo for long periods of time.

No mutual recognition of return decisions

The proposed Return Regulation obligates EU Member States to mutually recognize and enforce each other's decisions (art. 9). The introduction of a "European Return Order" as a digital registration of a return decision (art. 7) should enable the EU Member States to ensure that return orders are enforced. Considering that national asylum systems have very different quality and capacity[7], resulting in unharmonized recognition rates, the proposal on obligatory mutual recognition of return rates is concerning and should be deleted.

DRC recommendation on art. 9

DRC calls for art. 9 to be deleted.

Solutions for people who cannot be returned

Obligations should also apply to the EU Member States: if people - for reasons beyond their control and despite their full cooperation with the authorities – cannot be returned, solutions must be found. Although EU Member States are allowed to grant residence on compassionate or humanitarian grounds (art. 7(9)), there is no obligation to do this. People who cannot be returned thus risk staying in limbo for years.

There is a need for binding rules on options for regularization within a reasonable time after the return decision, such as residence permits in the EU Member States. It is necessary to have solutions if return cannot take place, e.g. adequate reception conditions as well as the possibility for residence permits, while the rejected asylum seeker awaits return.

[7] ECRE, ECRE Comments Paper: Proposal for a Return Regulation, June 2025, page 19.

DRC thus supports the proposal by ECRE to include a new article in the Return Regulation that can make it possible for people to get legal stay, if they cannot be returned.

DRC recommendation for a new art. 7(1)(a)

DRC calls for the Return Regulation to obligate the EU Member States to provide possibilities for regularization for people who cannot be returned, as suggested by ECRE.[8]

New art. 7(1)(a)
Where a return decision cannot be issued, including because return is currently not feasible or possible, the Member State should review the options available in national law and where relevant a temporary status shall be issued allowing the third-country national to reside lawfully on the territory of the Member State. Their legal status, rights and obligations will be provided to them in writing in a language they understand or could be reasonably expected to understand.

Forced return should be avoided (art. 13)

In the proposed Return Regulation, the possibility of voluntary return is restricted by deleting the minimum time period of seven days, while keeping the maximum time limit for voluntary return to 30 days. The obligation of the EU Member States to extend the time period has been changed from "shall" to "may" (art. 13). The obligation to comply and cooperate with the authorities has also been enhanced with a reference to the new art. 21 on obligations to cooperate.

The time limits for deciding to return voluntarily have been restricted (art. 13). Any possible extension will depend on whether the authorities find that the rejected asylum seeker cooperates. The combination of short time limits and conditionality to allow for voluntary return can cause rejected asylum seekers to be removed with unnecessary force.

Voluntary or rather accepted return should always be encouraged as forced return undermines human dignity. Additionally, the chances for sustainable reintegration are likely to improve following a dignified return process. In practical terms, 30 days might not always be enough to plan for the travel. There is thus a need for flexibility in the system to support the rejected asylum seekers, while they cooperate.

DRC recommends a minimum time limit of seven days for voluntary return in art. 13 to ensure that people get a chance to consider their options. Time limits for voluntary returns should be flexible, and the extension of the time limits should be based on individual needs rather than fixed deadlines.

Accepted or voluntary return should be encouraged

In DRC's view, the return procedure should focus on creating the widest possible opportunities for accepted or voluntary return, where rejected asylum seekers are given the necessary time and conditions to meaningfully prepare, build trust, and influence their own return process. DRC also recalls the Twenty Guidelines on Forced Return by the Committee of Ministers of the Council of Europe,[9] which obligate the states to promote voluntary return over forced return.

[8] ECRE, ECRE Comments Paper: Proposal for a Return Regulation, June 2025, page 17.
[9] Council of Europe, 20 Guidelines Forced Return, September 2005.

Additionally, experience from the Danish return system shows that the cooperation between authorities and civil society can facilitate better engagement in the return procedure and support voluntary or accepted return.[10] It is especially important for vulnerable people, who can have difficulties understanding the procedure and obligations.

DRC has interviewed returnees from Denmark to Iraq, and they informed that many felt pressured to return as the decision to was not voluntary but rather accepted due to a lack of other choices, During the initial period after returning, the returnees' experiences included feelings of shock, which may also reflect and be closely tied to their level of preparedness to return as there was a difference in experiences between those who actively accepted to return and those who felt more pressured. DRC concluded that the people who made more of an active choice reported less frustration and a stronger sense of resources during their initial period back.[11]

DRC recommendation on art. 13

DRC calls for a more flexible extension of the time limit for voluntary return that considers the individual situation of the rejected asylum seeker. DRC recommends for the following changes to art. 13, which are similar to ECRE's proposal.[12]

Art. 13 Voluntary *or accepted* return

1.~~**When the third-country national is not subject to removal in accordance with Article 12, the**~~ The return decision shall indicate a date by which the third-country national shall leave the territory of the Member States and shall state the possibility for the third-country national to leave earlier.

2. The date referred to in paragraph 1 shall be determined with due regard to the specific circumstances of the individual case. The date by which the third-country national shall leave ***shall be at least 7 days but*** not exceed 30 days from the date of notification of the return decision.

3.Member States may provide for a longer period or extend the period to leave their territory in accordance with paragraph 1 taking into account the specific circumstances of the individual case, such as family links, the existence of children attending school, ***any specific preparation needed, particularly for vulnerable groups including the assessment of health and medical needs,*** participation in a programme supporting return and reintegration pursuant to Article 46(3) ~~**and compliance with the obligation to cooperate as set out in Article 21.**~~ Any extension of the period to leave shall be provided in writing to the third-country national.

4.The third-country national shall leave the territory of the Member States by the date determined pursuant to paragraph 1. If not, ***the circumstances shall be reviewed to see*** if the third-country national ~~**shall**~~ ***should*** be subject of removal in accordance with Article 12***, or if a further extension is needed.***

Ensure access to impartial counselling and meaningful reintegration support (art. 46)

The proposed Return Regulation obligates EU Member States to establish return and reintegration counselling structures (art. 46).

[10] DRC and Danish National Police, Preparation and implementation of return operations in Denmark and other EU Member States, May 2009.
[11] DRC, Experiences of return and reintegration. Voices of returnees from Denmark to Iraq, June 2025, page 15.
[12] ECRE, ECRE Comments Paper: Proposal for a Return Regulation, June 2025, page 25-26.

The obligation to establish return and reintegration counselling structures is a positive development as access to meaningful and sufficient reintegration assistance can support dignified return and sustainable reintegration. However, access to reintegration assistance should not be limited based on whether a person cooperates during the return procedure. A rejected asylum seeker can need assistance regardless of whether the person has cooperated or not – and sometimes the most vulnerable persons have problems understanding the system.

Access to return and reintegration assistance should be based on individual needs rather than the level of cooperation and compliance as suggested in art. 46.

Impartial and non-directive return counselling

To ensure a dignified return procedure, forced removal and limitations on reintegration assistance should be avoided.[13] For rejected asylum seekers to accept and comply with the return decision, it is important to allow necessary time and support during the return procedure. Impartial and non-directive return counselling is an essential tool to support rejected asylum seekers to engage in the return procedure and make informed decisions about their future, including on return.[14]

It is important to recognize the complexity of the return process. In DRC's experience[15], many rejected asylum seekers may have held onto to the hope of becoming recognized as refugees for a long time, and it takes time to adjust and become able to engage in the return procedure. Access to counselling can support people in making informed decisions about the future by assisting with a better understanding of the return procedure and the consequences of non-compliance.

To DRC, return counselling includes more than providing information and guidance about the return procedure. Good counselling also enables the rejected asylum seekers to engage in conversations about returning and about how a life and future would be in the country of origin.

To create a confidential space for rejected asylum seekers where worries, questions, and strategies can be shared and discussed freely, return counselling is best done in a safe atmosphere by non-governmental counsellors with good, empathetic communication skills. The goal of return counselling should be to empower individuals and support informed decision-making about their future. Without it, the asylum seekers may not trust the facts and information provided by the return counsellor, e.g. about the reintegration programmes, lack of possibilities for legal stay in the EU Member State and may thus be less willing to accept the return decision.

After a final rejection of an asylum claim, it is thus important that people get access to independent, impartial, and non-directive counselling on both the legal matters of their case and possible reintegration assistance. If rejected asylum seekers wish to explore pathways for legal stay, they should have access to independent legal counselling.

The use of threats of forced return and sanctions for non-compliance rarely provide clarity or lead to sustainable solutions. Instead, obligations and sanctions can make it harder for people to prepare meaningfully for the future and return. The reintegration process begins prior to departure, and it is thus important to have access to pre-departure counselling, receive guidance on reintegration activities, and have opportunities for skill development.

Meaningful reintegration assistance

Upon return, access to meaningful reintegration assistance is equally important for a rejected asylum seeker – regardless of whether the person decides to cooperate on the return. The possibility to get reintegration support should thus not be conditional upon whether a person has complied with the return procedure but depend on individual needs.

[13] DRC and Danish National Police, Preparation and implementation of return operations in Denmark and other EU Member States, May 2009.
[14] DRC, DRC Return Counselling Methodology Brief, August 2021.
[15] DRC, Dignified return, 2025.

Sustainable reintegration involves more than economic self-sufficiency; it is shaped by the returnees' experiences throughout the entire migration cycle and influenced by both individual, social, and contextual factors. Support should thus be holistic, tailored to individual needs, and addressing economic, social, and psychosocial elements.

DRC has published a report with the experiences of interviewed people, who have returned from Denmark to Iraq.[16] Conclusions from the interviews were that there was a difference in experiences between the people who actively accepted to return and those who felt more pressured. The people who made more of an active choice, reported less frustration and a stronger sense of resources during their initial period back.

The interviews also showed that preparedness involves more than sufficient pre-departure counselling: For many people, barriers such as detention, lack of agency, free choice, and emotional distress challenge their ability to effectively prepare and feel prepared for return. Many had been detained prior to departure and did not feel engaged or prepared to return either mentally or practically. The process of reintegration thus begins long before actual arrival in Iraq and a good basis for starting a reintegration process is feeling prepared and motivated. It may reduce the feeling of shock upon arrival or of "being shaken", as expressed by a returnee.[17]

DRC concludes that reintegration assistance "is often framed as a "motivational tool" used by states to ensure compliance with return decisions. This inevitably places the support within a political agenda, where the *primary* aim may not be to support people in rebuilding their lives, but rather to increase return rates. Returnees' own experiences and descriptions of the process must thus be understood within this context. Their stories are shaped not only by the personal challenges of return but also by the structural conditions and political intentions surrounding the process and support they receive."[18]

DRC recommendation on art. 46

DRC calls for return and reintegration assistance to be decided based on a person's individual needs and without consideration to the level of cooperation and the following wording of art. 46, in line with the proposal of ECRE.[19]

Art. 46 Support for return and reintegration

1. Member States shall establish ***independent and impartial*** return and reintegration counselling structures.

5. ~~**The assistance provided through the programmes for return and reintegration shall reflect the level of cooperation and compliance of the third-country national and may decrease over time. The following criteria shall be taken into account when determining the kind and extent of the return and reintegration assistance where applicable:**~~ ***The assistance provided through the programmes for return and reintegration should consider:***

~~**a. the cooperation of the third-country national concerned during the return and readmission procedure, as provided for in Article 21;**~~

~~**b. whether the third country national is returning voluntarily, or is subject to removal;**~~

~~**c. whether the third-country national is a national of a third country listed in Annex II to Regulation (EU) 2018/1806;**~~

~~**d. whether the third country national has been convicted of a criminal offence;**~~

~~**e.**~~ whether the third-country national has specific needs by reason of being a vulnerable person, minor, unaccompanied minor or part of a family.

[16] DRC, Experiences of return and reintegration. Voices of returnees from Denmark to Iraq, June 2025.
[17] DRC, Experiences of return and reintegration. Voices of returnees from Denmark to Iraq, June 2025, page 15.
[18] DRC, Experiences of return and reintegration. Voices of returnees from Denmark to Iraq, June 2025, page 24.
[19] ECRE, ECRE Comments Paper: Proposal for a Return Regulation, June 2025, page 58.

Harsh sanctions for non-compliance should be avoided (art. 22)

The proposed Return Regulation enhances the obligation to cooperate, which rejected asylum seekers must comply with during the return procedure (art. 21). Non-compliance can cause sanctions such as refusal or reduction of benefits or incentives granted to promote voluntary return (art. 22). Rejected asylum seekers are required to remain available to the authorities, e.g. by residing at a specific place (art. 23). If this requirement is not fulfilled, the authorities can decide that the person is at risk of absconding (art. 30), which is a ground for detention (art. 29). Detention can also be used, if a person avoids return (art. 29).

While the use of obligations can be reasonable during the return procedure, sanctions should neither be unfair nor limit the possibility for voluntary return and access to reintegration assistance. Further, harsh penalties should be avoided because it can undermine human dignity and in our experience such approaches fail to be effective as a motivational tool. There is no possibility of complaining about a decision on non-compliance. The consequences for non-compliance can be problematic, especially for vulnerable people, who can have difficulties understanding the procedure. To ensure that all decisions about sanctions are fair and transparent, it should be possible to complain and get access to free legal assistance.

DRC primarily recommends that art. 22 are deleted to avoid harsh sanctions against rejected asylum seekers. Alternatively, DRC recommends that decisions about consequences of non-compliance as suggested in art. 22 are formalized to ensure transparency about the assessment and allow rejected asylum seekers to complain against these decisions with free legal assistance.

With the introduction of obligations, the rejected asylum seekers will have to stay at specific locations and be required to comply and cooperate at all stages of the return procedure, e.g. remain available to the authorities and provide necessary information. The rejected asylum seekers can be sanctioned in case of non-compliance, e.g. limited possibility for voluntary return and reduced reintegration support as well as detention due to the risk of absconding.

This approach is similar to current Danish return system, and while obligations can be reasonable harsh sanctions for non-compliance are problematic and can prevent dignified return. Harsh sanctions for non-compliance can have a negative impact on a person's ability to engage in the return procedure. The use of punitive measures can thus limit the possibility for a person to return voluntarily.

If the decision of the authorities is not formalized, it will not be transparent how the decisions are made, and whether the authorities have assessed the proportionality of sanctions in relation to the right to private and family life. Although the consequences for non-compliance can have serious impact on rejected asylum seekers' lives, there is no right to appeal the authorities' decisions about sanctions. The obligation to cooperate should not be followed by sanctions that impact a person's ability to engage in the return procedure and get meaningful reintegration support.

DRC recommendation on art. 22

DRC calls for the deletion of art. 22 to avoid harsh sanctions against rejected asylum seekers. Alternatively, DRC recommends for the addition of a new art. 22(2) that ensures the right to complain about decisions of non-compliance and get free legal assistance.

Art. 22 Consequences in case of non-compliance with the obligation to cooperate
New art. 22(2) The third-country national shall be able to appeal a decision about non-compliance and get free legal assistance,

Standards of living should be dignified and avoid detention (art. 30, 32-35)

The proposed Return Regulation expands the grounds for detention (art. 29), especially in relation to the "risk of absconding" (art. 30). EU Member States must consider alternatives to detention such as obligations to report and reside at a specific place (art. 31).

The maximum detention period is under certain circumstances proposed extended from 18 months up to 24 months (art. 32), with review every three months at the latest (art. 33). Detention of asylum seekers is still allowed in prisons, if they are kept separately from prisoners convicted of crime (art. 34). The possibility of detaining children and families has been retained with the addition that it must in the best interests of the child (art. 35).

The expanded grounds for detention and the broad definition of "risk of absconding" risk causing increased use of detention for rejected asylum seekers, also as a consequence of non-compliance. The use of detention does not constitute dignified and adequate standards of living and should thus be limited to situations where it is necessary and proportionate. Detention also limits access to medical and legal aid, which can have serious consequences for the individual person. It is not a crime to ask for international protection, and detention can never be in the best interests of a child.

DRC recommends limiting the use of detention as much as possible. The grounds for detention should not be expanded as suggested in art. 29 and 30, because it could lead to increased detention. The possibility of detaining children and families as allowed under art. 35 should be deleted as detention can never be in the best interests of the child.

Any detention period should be as short as possible and not be extended beyond the current maximum of 18 months as suggested in art. 32. The review should take place automatically every four weeks instead of every three months as suggested in art. 33. Detention should take place in specialized facilities, not in prisons as suggested in art. 34, to ensure adequate conditions to prepare for return.

Detention has a negative impact on the health of rejected asylum seekers

To safeguard the mental and physical health of rejected asylum seekers, they should always be offered dignified and adequate living conditions. Such living conditions include access to adequate support to enhance empowerment and maintain their skills and sense of agency.

Detention often has a negative impact on the health of the individual asylum seeker, especially because there is no end date, which causes stress and anxiety.[20] Detention can limit access to medical and legal aid, which can have serious consequences for the individual person.[21]

According to testimonies of people, who have returned from Denmark to Iraq, the experience of detention causes them to feel overwhelmed, anxious, and unable to focus on planning for their return. Detention prior to departure significantly limited the possibility to prepare the return, keep contact with family, and make necessary arrangements.[22]

[20] Amnesty International Denmark, Sårbare udlændinge bag tremmer, July 2024, page 56.
[21] JRS, Detained and Unprotected: Access to Justice and Legal Aid in Immigration Detention Across Europe, 10 July 2024.
[22] DRC, Experiences of return and reintegration. Voices of returnees from Denmark to Iraq, June 2025, page 14.

"Risk of absconding"

As clearly stated in international law it is not a crime to apply for international protection; thus, the use of detention should be limited as much as possible as it does not apply to rejected asylum seekers, and it does not constitute dignified and adequate standards of living. Using lack of cooperation (art. 29) and the broad criteria as listed in the "risk of absconding" (art. 30) to justify detention, risk causing increased use of detention.

To avoid automatic detention, the assessment of the risk of absconding should be individualized and based on several criteria at the same time. Special consideration must be given to vulnerable people, as they can have difficulties understanding the rules and detention can have an even more serious impact on their well-being.

DRC recommendation for art. 30

DRC calls for the "risk of absconding" to be determined based on an overall assessment of the specific circumstances of the individual case and recommends for art. 30 being replaced with the following wording as proposed by ECRE.[23]

Art. 30 Risk of absconding
The existence of a risk of absconding shall be determined on the basis of an assessment of the specific circumstances of the individual case and on the basis of an exhaustive list of objective criteria laid down in national legislation, The criteria should be conducive to a risk assessment of the individual's future conduct or relate to the individual's stated intention not to comply with the return decision. A risk of absconding should not be automatically presumed on the basis of the third-country national's past conduct.

Detention period

The current possibility to detain up to 18 months is already very long and has serious impact on the individual person. If return has not been possible within such a long period, the person should be released. The length of detention should thus not be extended to up to 24 months.

DRC recommendation for art. 32

DRC calls for the duration of detention to be as short as possible and recommends for the following formulation as proposed by ECRE.[24]

Art. 32 Detention period
2. When it appears that the conditions laid down in Article 29 are no longer fulfilled, detention shall cease to be justified and the third-country national shall be released. ~~**Such release shall not preclude the application of measures to prevent the risk of absconding in accordance with Article 31.**~~
(3) The detention shall not exceed ~~**12**~~***6*** months ~~**in a given Member State. Detention may be extended for a period not exceeding a further 12 months in a given Member State where the return procedure is likely to last longer owing to a lack of cooperation by the third-country national concerned, or delays in obtaining the necessary documentation from third countries.**~~
~~**(4) The expiry of the maximum detention period in accordance with paragraph 3 does not preclude the application of measures in accordance with Article 31.**~~

[23] ECRE, ECRE Comments Paper: Proposal for a Return Regulation, June 2025, page 49.
[24] ECRE, ECRE Comments Paper: Proposal for a Return Regulation, June 2025, page 51-52.

Review of detention orders

To ensure that people are not detained longer than necessary, it is essential that the review of the detention order takes place ex officio. In Denmark, there is a good practice of automatically reviewing detention orders every four weeks. It could thus be used as a minimum standard.

DRC recommendation for art. 33

DRC calls for reviews of detention orders to take place ex officio every four weeks.

Art. 33 Review of detention orders
DRC recommends the following change to art. 33(1):
1. Detention shall be reviewed at regular intervals of time and at least every ~~**three months**~~ ***four weeks*** ~~**either on application by the third-country national concerned or**~~ *ex officio*.

Detention in specialized facilities

Detention of rejected asylum seekers should only take place in specialized facilities that do not resemble prisons to ensure the health and well-being of the individual person.

Respect for the right to family life should be protected by ensuring that rejected asylum seekers can always communicate with their family members, e.g. by having their own phone. Access to a private phone will also support dignified return because it allows the person to prepare for return by having contact with family in the country of return, local reintegration partners etc.

DRC recommendation for art. 34

DRC calls for supporting rejected asylum seekers to be detained in specialized facilities in line with ECRE's proposal for art. 34(1).[25] DRC also calls for rejected asylum seekers to be able to keep contact with their family members during detention and the following wording of art. 34(3).

Art. 34 Detention conditions
1. Detention shall take place, as a rule, in specialised facilities, including those ~~**in dedicated branches of other facilities**~~ ***adapted to meet the gender-specific, age-appropriate, and vulnerability-related needs of detained third-country nationals***. Where a Member State cannot provide for detention in such facilities and is obliged to resort to prison accommodation, the third-country nationals shall be kept separated from ordinary prisoners ***and housed in conditions appropriate to their status and needs***.
3. Third-country nationals in detention shall be allowed, on request, to ~~**establish in due time**~~ ***keep*** contact with legal representatives, family members and competent consular authorities

[25] ECRE, ECRE Comments Paper: Proposal for a Return Regulation, June 2025, page 52.

Children should never be detained

It is very concerning that the possibility of detaining children and families has been retained as detention will never be in the best interests of the child.[26] As stated by the European Court of Human rights, children are extremely vulnerable and their specific needs as well as their status as asylum seekers must be considered.[27]

DRC recommendation for art. 35

DRC calls for the deletion of art. 35 to ensure that children are never detained.

"Return hubs" should not be introduced (art. 4 and 17)

Schemes aimed at outsourcing responsibility for returning rejected asylum seekers to third countries have a high risk of violating human rights. So-called "return hubs" thus also risk becoming "zones of exemption", where fundamental rights are not respected, and where people cannot access necessary services.

DRC recommends the deletion of art. 4(3)(g) and art. 17.

The introduction of art. 4(3)(g) and art. 17 attempts to establish the legal basis for EU Member States to make agreements with third countries on so-called "return hubs". Even if such centers may in theory be legal under EU law, in practice they risk creating "zones of exemption" when it comes to compliance with fundamental rights, with excessive use of force including restricting freedom of movement, hindering access to legal and medical assistance etc. The fact that unaccompanied minors and families with children are exempted from transfers to return hubs underlines the risks such schemes entail.[28]

Experiences with previous externalization schemes, such as the UK-Rwanda deal, show that such arrangement are likely to be ineffective, very expensive, and in reality, housing very few people if the arrangement ever becomes functional. It is in the EU's interest that the EU Member States take responsibility for ensuring that the national asylum and return systems function well and have the necessary quality, capacity, and resources.

The search for so-called "innovative solutions" to deter arrivals of asylum seekers does not contribute to making return safe and dignified. On the contrary, schemes such as return hubs risk making the national systems extremely expensive and ineffective while also undermining respect for human dignity in and around the EU.

DRC recommendations on art. 4 and 17

DRC calls for art. 4(3)(g) and art. 17 to be deleted.

[26] IDC, IDC analysis on EU returns regulation, April 2025.
[27] ECtHR, Factsheet - Unaccompanied migrant minors in detention, October 2024.
[28] FRA, Planned return hubs in third countries: EU fundamental rights law issues, February 2025.

The Danish return system

Denmark has an opt-out from the area of Justice and Home Affairs, which means that only parts of the European asylum acquis apply to the Danish asylum system. However, Denmark is part of the Schengen cooperation and thus implements the EU return rules as part of the Danish Aliens Consolidation Act and the Danish Act regarding the Return of Foreign Nationals with No Leave to Stay.

In the regular Danish asylum procedure, the decision on asylum and return is made jointly by the Danish Immigration Service (Udlændingestyrelsen) in the first instance and the Refugee Appeals Board (Flygtningenævnet) in the second instance. During the appeal procedure, all rejected asylum seekers are appointed a lawyer to represent them towards the Refugee Appeals Board. The lawyers are specialized in asylum law and paid by the state. Since 2020, the Danish Return Agency (Hjemrejsestyrelsen) has been responsible for returning people, who have been ordered to leave Denmark.

Forced returns are enforced by the Danish police. Forced returns of rejected asylum seekers are monitored by the Ombudsman of the Danish Parliament. Denmark can use Frontex flights to enforce removals.

All rejected asylum seekers can get legal aid and counselling by DRC throughout the asylum procedure and counselling on return and reintegration after a possible rejection.

DRC's reflections on the Danish return system

The Danish return system is often promoted as being effective in ensuring return of rejected asylum seekers.[29] In this context, it is relevant to consider the low number of rejected asylum seekers. By the end of 2024, around 330 rejected asylum seekers were eligible for return.[30] During in 2023 and 2024, Denmark received between 2,479-2.333 asylum seekers per year and as the recognition rate in the first instance was 72%-55%,[31] most asylum seekers were recognized as refugees.

The Danish return system includes positive elements such as access to accommodation, higher reintegration assistance than the Frontex level, and counselling on return and the possibility to get reintegration assistance. The number of forced returns is low, and there is good cooperation between the authorities and the legal aid providers.

But the political aim to "motivate" rejected asylum seekers to leave with the use of punitive measures such as obligations to stay under difficult living conditions with regular reporting to the authorities and harsh sanctions for non-compliance are worrying as they undermine human dignity – and do not encourage voluntary or accepted return.

All appeals have an automatic suspensive effect on the return decision

The Danish authorities make joint decisions on asylum and return. It is positive that an appeal of a first instance decision has automatic suspensive effect on the return decision. However, before an appeal is sent to the Danish Refuge Appeals

[29] German Government, Kanzler Merz empfängt Ministerpräsidentin Frederiksen in Berlin, 11 June 2025.
[30] Danish Ministry for Immigration and Integration, Rekordfå afviste asylansøgere i udsendelsesposition, 21 December 2024.
[31] Danish Ministry for Immigration and Integration, Tal og fakta på udlændingeområdet 2024, Spring 2025.

Board, there is a reflection period, where rejected asylum seekers can choose not to have the appeal examined and instead receive financial assistance.[32]

The so-called reflection interview is conducted by the Danish Return Agency and aim to inform the rejected asylum seekers about their possibility to become recognized as refugees based on the recognition rates for their respective nationalities. The reflection interview is a very concerning procedure as it can hinder rejected asylum seekers in having their claim examined in two instances. For rejected asylum seekers, who are detained, the reflection interview can be especially problematic as they can feel pressured to give up the appeal.

Accommodation at return centres

All asylum seekers, who have received a final rejection, are obligated to stay in return centers: Kærshovedgård for adults, run by the Danish Prison and Probation Authority, and Avnstrup for women and families with children, run by the Danish Red Cross.

As a general principle, DRC finds it better that rejected asylum seekers are provided with accommodation, than people being forced to live on the streets as observed in other EU Member States. However, the living conditions at the return centers do not support dignified return as they have become increasingly strict with the political aim to "motivate" people to leave Denmark. In addition, they are more expensive than regular asylum centers.[33]

The rejected asylum seekers, who are accommodated at the return centers, have limited possibilities to make decisions about everyday life such as which food they want to eat and there are few activities to keep people occupied. Such restrictions have a negative impact on people by making them passive and thus less able to engage in the return process.

At the return center Kærshovedgård, the rejected asylum seekers are accommodated together with people who have been sentenced for a crime and expelled or people, who have been excluded from refugee status. According to statistics from the Danish Immigration Service, only about 20% of the people staying at the center are rejected asylum seekers, which has an impact on the environment at the center. Danish Red Cross works in the center and provide support to the rejected asylum seekers. There is very limited access to health services, which is especially problematic for vulnerable people.

Detention of adults with restrictions on the right to family life

Rejected asylum seekers can be detained to enforce a preceding return or removal, if the authorities find that they do not cooperate or identify the risk of absconding. All detention orders over three days are reviewed by a judge every four weeks, which is positive.

The detention facility for rejected asylum seekers is called Ellebæk Centre. It is run by the Danish Prison and Probation Authority and has been criticized for being a prison-like environment even though the detained rejected asylum seekers have not committed any crime.[34] Many of the correctional officers working in Ellebæk have previously worked in penitentiary facilities with convicted criminals serving a prison sentence and have not been adequately trained to work with asylum seekers.[35]

[32] About 12-14% of first instance rejected asylum seekers choose to receive financial assistance, according to the Director of the Danish Return Agency, Politiken, Fem år efter at Hjemrejsestyrelsen blev oprettet, vækker resultaterne opsigt i udlandet, 28 April 2025.
[33] About two-three times as expensive according to SOS Racisme, Udrejsecentrene og Ellebæk er dyre for Danmark - og for de mennesker de ødelægger, 20 March 2025.
[34] Council of Europe, Anti-torture Committee publishes report on Denmark, 12 December 2024, Amnesty International Denmark, Sårbare udlændinge bag tremmer, July 2024, and DRC, Anbefalinger: Kærshovedgård og tålt ophold, May 2024.
[35] Amnesty International Denmark, Sårbare udlændinge bag tremmer, July 2024.

An important restriction is the fact that rejected asylum seekers are not allowed to keep a personal phone,[36] and that they can receive a disciplinary punishment, if they have a phone in Ellebæk. Instead, they can use a public phone for which they have to pay.

The reasoning is that Ellebæk is being run like a regular prison, where such restrictions are applied to people, who are in custody detention due to suspicion of crime. Rejected asylum seekers can only use phones provided by Ellebæk for which they have to pay with special cards. This limitation has serious impact on both the right to family life as well as the possibility to engage in the return procedure. A very good practice is that children are never detained. However, sometimes one parent can be detained to ensure the removal of a whole family.

Heavy sanctions for lack of fulfilling obligations

Rejected asylum seekers have for years been subjected to different obligations such as having to stay at return centres and reporting to the authorities. With the Danish Return Act of 2020, the sanctions for non-compliance were made harsher with the risk of prison sentences for up to four months.

Overall, it is a heavily punitive system based on a non-transparent administrative discretion by the Danish Return Agency, which relies on registration mechanisms that provides no option for verification by the rejected asylum seekers. The current legal framework will hold most residents at the return centers, while being subjected to the various duties mentioned. The authorities do not assess the proportionality of these duties in relation to the right to private and family life. There is no right to complain about the authorities' decisions regarding the obligations.

The consequences for non-compliance with the obligations also raise serious concerns for vulnerable people, who have difficulties understanding the procedure and thus might be unjustified sanctioned. Access to legal aid and counselling is thus essential to ensure that vulnerabilities are identified and that procedures are adapted to the individual special needs.

Many rejected asylum seekers have been in Denmark for a long time due to the lengthy asylum procedure or because their residence permits have been withdrawn. People who have stayed for several years in Denmark, often have family and the obligation to stay at dedicated return centers can make it difficult for rejected asylum seekers to visit they family, especially when they have young children.

Some people choose to visit their family, even though it violates the obligation to stay at the center or report. In such situations, they might be sanctioned to prison, which is counter-productive to their possibility to return or legalize their stay. On average, people stay at the return center Kærshovedgård for about 3,2 years,[37] before they either disappear or are forcefully removed. These statistics clearly show that the punitive measures neither encourage voluntary return nor make return more efficient.

Access to legal aid and impartial counselling

It is very positive that all rejected asylum seekers can get access to impartial counselling by DRC on both the legal matters of their asylum case, possibilities to regularize their stay, as well as on return and reintegration.[38]
But as mentioned, the lack of possibility to complain about a decision on non-compliance with obligations is still a serious issue for many asylum seekers.

Possibility of getting meaningful reintegration assistance

The Danish authorities offer reintegration assistance to help rejected asylum seekers to be re-established in the local community when he or she returns home. The reintegration assistance can be adapted to the wishes and needs of the individual person to ensure that the reintegration is sustainable. The Danish authorities pay a top-off compared to the levels of reintegration assistance provided by Frontex.

[36] Danish Parliamentary question, UUI Almdel endeligt svar på spørgsmål 483, 1 May 2023.
[37] Danish Ombudsman, 2024-14. Tilsynsbesøg på Udrejsecenter Kærshovedgård, personer på tålt ophold, 2023.
[38] DRC, DRC's counselling to asylum seekers, 2025.

However, the rejected asylum seekers must comply with the return decision and cooperate with the authorities (for at least two months prior to the departure) to get reintegration assistance. Rejected asylum seekers, who are returned under Frontex programs from other EU Member States can get reintegration assistance, even though the return is forced.

Collaboration between the authorities and legal aid providers

There is a well-functioning collaboration between the authorities and DRC, which can assist in supporting the individual's ability to engage in the return procedure. In 2008, the Danish authorities and DRC in an EU-funded return project developed joint best practices for dignified and sustainable return. Training material was developed as part of the project and DRC still conducts trainings on a regular basis of police officers working with return.[39]

DRC's work with rejected asylum seekers

DRC has provided legal aid to asylum seekers since the 1980's. In Denmark, DRC has provided counselling to rejected asylum seekers for many years. The priority is to ensure that each person's dignity is respected throughout the return process. DRC's aim is to empower individuals to make informed decisions about their future, whether that means exploring pathways for legal stay or working towards sustainable reintegration.[40]

DRC has a team of experienced counsellors, skilled in social work and good, empathic communication. This allows them to engage in meaningful counselling with rejected asylum seekers about their situation.

The return counselling is impartial and only provided with a humanitarian aim to support and contribute to clarification among asylum seekers in a return position. DRC works rights-based and with a purpose to ensure that asylum seekers have access to thorough information about their situation and about the different choices and possibilities available to them. Our aim is to support them in making informed decisions about their future. The counselling does not necessarily focus on return. Instead, the counselling takes a holistic approach and is based on the understanding that the asylum seeker is an expert in his or her life. The main purpose is to support informed decisions and inspire the individual's agency.

DRC counsellors apply DRC's return counselling methodology[41] which is an approach that has been developed over several years to ensure a qualified and professional approach that addresses the complexity of return counselling. It is based on a deep professional understanding of a vulnerable and complex target group with different resources and challenges as well as a fundamental recognition of the difficult situations many asylum seekers face.

Many rejected asylum seekers need time to adjust to their new situation. Some may feel frustrated, be sad, lack capability to act, or feel completely detached from their own asylum case. The starting point for counselling is always the asylum seekers' own perspectives and thoughts about their future. Counselling is thus guided by the topics that the asylum seeker brings to the table and will often involve conversations about the legal process and rejection, worries, as well as possible strategies and plans for the future.

DRC's return counsellors offer more than just accurate information. DRC wants to create a counselling space that is safe and allows for qualified conversations, where all topics are welcomed, and where there are always two experts present: the counsellor with the solid knowledge about the asylum system, and the asylum seeker, who is an expert in his or her own life. The counselling is thus always person-centered, adjusted to the individual, and based on the principles of recognition and empowerment.

[39] DRC and Danish National Police, Preparation and implementation of return operations in Denmark and other EU Member States, May 2009.
[40] DRC, Dignified return, 2025.
[41] DRC, DRC Return Counselling Methodology Brief, August 2021.

Founded in 1956, the Danish Refugee Council (DRC) is Denmark's largest international NGO, with a specific expertise in forced displacement. DRC is present in close to 34 countries and employs 6,000 staff globally.

DRC advocates for the rights of and solutions for displacement-affected communities, and provides assistance during all stages of displacement: In acute crisis, in exile, when settling and integrating in a new place, or upon return. DRC supports displaced persons in becoming self-reliant and included into hosting societies. DRC works with civil society and responsible authorities to promote protection of rights and inclusion.

Our 6,200 volunteers in Denmark make an invaluable difference in integration activities throughout the country.

DRC's code of conduct sits at the core of our organizational mission, and DRC aims at the highest ethical and professional standards. DRC has been certified as meeting the highest quality standards according to the Core Humanitarian Standard on Quality and Accountability.

HM Queen Mary is DRC's patron.

To read more about what we do, see: www.drc.ngo

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