Delegations are kindly invited to use this template to share their comments on any of the draft country programme documents being presented to the Executive Board during the forthcoming session.

Delegation name: Denmark

Draft country programme document: Somalia Country Programme Document

In accordance with Executive Board decision 2014/1, country programme documents are considered and approved in one session, on a no-objection basis. All comments received by the Office of the Secretary of the Executive Board before the deadline will be made public on the Executive Board website, and considered by the requesting country, in close consultation with UNICEF.

<table>
<thead>
<tr>
<th>General comments</th>
<th>UNICEF appreciates the Government of Denmark’s acknowledgement on the new CPD’s approach towards institutional capacity building and the balancing of the downstream and upstream in our programming. The new CPD starting in 2021 alongside a new federal government offers a critical opportunity. UNICEF remains committed to the normative agenda, especially on the rights of the girl child and women, in a challenging and often sensitive environment (We have further strengthened this point in paragraph 58). UNICEF will engage parliamentarians in forums directly related to the CRC implementation as a strong advocacy platform, including a possible formation of a Parliamentary Caucuses on Child Rights to align with CRC Committee review of the State Party Report. Through our partnerships with civil society, UNICEF will seek stronger rights-based conversations among Somali stakeholders. This has been UNICEF will engage with the Ministry of Religion on issues related to child rights toward influencing norms and practices taught within Madrassas and engaging with the religious community on the rights of children with a specific focus on FGM and child marriage among others.</th>
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<td>Positive that the approach has developed from previous country programmes to a larger focus on capacity-building of national, regional and local authorities instead of INGOs. Important with the combination of downstream and upstream. UNICEFs work in and with communities is and will change social norms, but the normative agenda and key pieces of legislation remains important. In 2020 we witnessed a push from certain groups and individuals, including from the Somali Lower House and Cabinet Ministers that would take Somalia backwards in terms of protection of especially women and girls. If/how will UNICEF engage with these groups and how will UNICEF mobilise with Somali civil society to establish a coalition for improved rights of women, girls and children. Is UNICEF and partners sufficiently equipped to engage in religious conversations around rights of women, girls and children?</td>
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UNICEF will launch a multi-sectoral and cross-ministerial campaign on child rights and the enactment of the Child Rights Bill, which is considered to be less controversial than Sexual Offences Bill and provides significant protections for women and girls through prohibition of child marriage and FGM, issues on which the Sexual Offences Bill is silent.

### Comments on specific aspects of the country programme document

_Delegations providing comments may wish to include details, such as the page number, paragraph number, or page of the annexed results and resources framework._

On paragraph 58 and 59: though this work is crucial, we have seen attempts from certain Ministries and from the Lower House to weaken the already fragile protection environment. What approach will UNICEF take if there is an even harder push from the Somali Government to enact i.e. the intercourse bill, change the definition of a child in the constitution etc.?

Paragraph 66 is very relevant and Denmark would be interested in a partnership around a dialogue with IFIs to include these activities and indicators in the process towards completion point.

Paragraph 72 lacks risk around a push by especially religious conservatives to take Somalia backwards in terms of protection of children and women.

As discussed above, UNICEF will take a firm position in line with the CRC. We continue our legislative support also including work on the Child Rights Bill, a legal instrument that will prohibit FGM and early marriage.

UNICEF will be calling on all member states engaged in humanitarian and development action in Somalia to share clear message and expectations to Somalia on the implementation of the CRC using all possible diplomatic channel including the Somalia Partnership Forum to push domestication of the CRC fundamentally through enactment of the Child Rights Bill. The CRC Committee review of the State Party report is a critical opportunity to voice such key advocacy messages.

We welcome the interest of Denmark in engaging in a partnership and dialogue with IFIs.

UNICEF agrees with the concern on possible risk of conservative voices in society undermining progress in the protection of children and women, and this critical risk has been included in paragraph 72.