
Table of Contents

I. Justice System..... 6

1. Please provide information on measures taken to follow-up on the recommendations received in the 2022 Report regarding the justice system (if applicable)..... 6

A. Independence..... 6

2. Appointment and selection of judges, prosecutors and court presidents (incl. judicial review) 6

3. Irremovability of judges; including transfers (incl. as part of judicial map reform), dismissal and retirement regime of judges, court presidents and prosecutors (incl. judicial review) 6

4. Promotion of judges and prosecutors (incl. judicial review) 7

5. Allocation of cases in courts 7

6. Independence (including composition and nomination and dismissal of its members), and powers of the body tasked with safeguarding the independence of the judiciary (e.g. Council for the Judiciary) 8

7. Accountability of judges and prosecutors, including disciplinary regime and bodies and ethical rules, judicial immunity and criminal/civil (where applicable) liability of judges (incl. judicial review)..... 8

8. Remuneration/bonuses/rewards for judges and prosecutors, including observed changes (significant and targeted increase or decrease over the past year), transparency on the system and access to the information..... 8

9. Independence/autonomy of the prosecution service..... 8

10. Independence of the Bar (chamber/association of lawyers) and of lawyers. 8

11. Significant developments capable of affecting the perception that the general public has of the independence of the judiciary..... 8

B. Quality of justice..... 9

12. Accessibility of courts (e.g. court/legal fees, legal aid, language)..... 9

13. Resources of the judiciary (human/financial/material) 9

14. Training of justice professionals (including judges, prosecutors, lawyers, court staff)..... 10

15. Digitalisation (e.g. use of digital technology, particularly electronic communication tools, within the justice system and with court users, including resilience of justice systems in COVID-19 pandemic) 10

16. Use of assessment tools and standards (e.g. ICT systems for case management, court statistics and their transparency, monitoring, evaluation, surveys among court users or legal professionals)..... 11

17. Geographical distribution and number of courts/jurisdictions (“judicial map”) and their specialisation, in particular specific courts or chambers within courts to deal with fraud and corruption cases.	11
<i>C. Efficiency of the justice system</i>	11
18. Length of proceedings.....	11
II. Anti-corruption framework	12
19. Please provide information on measures taken to follow-up on the recommendations received in the 2022 Report regarding the anti-corruption framework (if applicable).....	12
<i>A. The institutional framework capacity to fight against corruption (prevention and investigation / prosecution)</i>	12
20. List any changes as regards relevant authorities (e.g. national agencies, bodies) in charge of prevention detection, investigation and prosecution of corruption and the resources allocated to each of these authorities (the human, financial, legal, and technical resources as relevant), including the cooperation among domestic authorities. Indicate any relevant measures taken to effectively and timely cooperate with OLAF and EPPO.	12
21. Safeguards for the functional independence of the authorities tasked with the prevention and detection of corruption.	13
22. Information on the implementation of measures foreseen in the strategic anti-corruption framework (if applicable). If available, please provide relevant objectives and indicators.....	13
<i>B. Prevention</i>	13
23. Measures to enhance integrity in the public sector and their application (including as regards incompatibility rules, revolving doors, codes of conduct, ethics training). Please provide figures on their application.	13
24. General transparency of public decision-making, including rules on lobbying and their enforcement, asset disclosure rules and enforcement, gifts policy, transparency of political party financing).....	14
25. Rules and measures to prevent conflict of interests in the public sector. Please specify the scope of their application (e.g. categories of officials concerned).....	14
26. Measures in place to ensure whistleblower protection and encourage reporting of corruption.	14
27. List the sectors with high-risks of corruption in your Member State and list the relevant measures taken/envisaged for monitoring and preventing corruption and conflict of interest in these sectors (e.g. public procurement, healthcare, citizen investor schemes, risk or cases of corruption linked to the disbursement of EU funds, other), and, where applicable, list measures to prevent and address corruption committed by organized crime groups (e.g. to infiltrate the public sector)	15
28. Any other relevant measures to prevent corruption in public and private sector.....	15
<i>C. Repressive measures</i>	15
29. Criminalisation, including the level of sanctions available by law, of corruption and related offences, including foreign bribery.....	15
30. Data on investigation and application of sanctions for corruption offences, including for legal persons and high level and complex corruption cases) and their transparency, including as regards to the implementation of EU funds.....	15

31.	Potential obstacles to investigation and prosecution as well as to the effectiveness of criminal sanctions of high-level and complex corruption cases (e.g. political immunity regulation, procedural rules, statute of limitations, cross-border cooperation, pardoning).....	16
32.	Information on effectiveness of non-criminal measures and of sanctions (e.g. recovery measures and administrative sanctions) on both public and private offenders.....	16
III.	Media freedom and pluralism	17
33.	Please provide information on measures taken to follow-up on the recommendations received in the 2022 Report regarding media freedom and pluralism (if applicable)	17
<i>A.</i>	<i>Media authorities and bodies</i>	17
34.	Measures taken to ensure the independence, enforcement powers and adequacy of resources (financial, human and technical) of media regulatory authorities and bodies	17
35.	Conditions and procedures for the appointment and dismissal of the head /members of the collegiate body of media regulatory authorities and bodies.....	17
36.	Existence and functions of media councils or other self-regulatory bodies	17
<i>B.</i>	<i>Safeguards against government or political interference and transparency and concentration of media ownership</i>	17
37.	Measures taken to ensure the fair and transparent allocation of state advertising (including any rules regulating the matter).....	17
38.	Safeguards against state /political interference, in particular: -safeguards to ensure editorial independence of media (private and public) -specific safeguards for the independence of heads of management and members of the governing boards of public service media (e.g. related to appointment, dismissal), safeguards for their operational independence (e.g. related to reporting obligations and the allocation of resources) and safeguards for plurality of information and opinions - information on specific legal provisions and procedures applying to media service providers, including as regards granting/renewal/termination of licences, company operation, capital entry requirements, concentration, and corporate governance	18
39.	Transparency of media ownership and public availability of media ownership information, including on direct, indirect and beneficial owners as well as any rules regulating the matter.....	18
<i>C.</i>	<i>Framework for journalists' protection, transparency and access to documents</i>	18
40.	Rules and practices guaranteeing journalist's independence and safety, including as regards protection of journalistic sources and communications	18
41.	Law enforcement capacity, including during protests and demonstrations, to ensure journalists' safety and to investigate attacks on journalists	19
42.	Access to information and public documents (incl. transparency authorities where they exist, procedures, costs/fees, timeframes, administrative/judicial review of decisions, execution of decisions by public authorities, possible obstacles related to the classification of information)	19
43.	Lawsuits (incl. SLAPPs - strategic lawsuits against public participation) and convictions against journalists (incl. defamation cases) and measures taken to safeguard against manifestly unfounded and abusive lawsuits	19
IV.	Other institutional issues related to checks and balances	19
44.	Please provide information on measures taken to follow-up on the recommendations received in the 2022 Report regarding the system of checks and balances (if applicable).....	19
<i>A.</i>	<i>The process for preparing and enacting laws</i>	20

45. Framework, policy and use of impact assessments and evidence based policy-making, stakeholders'11/public consultations (particularly consultation of judiciary and other relevant stakeholders on judicial reforms), and transparency and quality of the legislative process	20
46. Rules and use of fast-track procedures and emergency procedures (for example, the percentage of decisions adopted through emergency/urgent procedure compared to the total number of adopted decisions).....	20
47. Regime for constitutional review of laws	21
48. COVID-19: provide update on significant developments with regard to emergency regimes/measures in the context of the COVID-19 pandemic - judicial review (including constitutional review) of emergency regimes and measures in the context of COVID-19 pandemic - oversight (incl. ex-post reporting/investigation) by Parliament of emergency regimes and measures in the context of COVID-19 pandemic - processes related to lessons learned/crisis preparedness in terms of the functioning of checks and balances	22
<i>B. Independent authorities</i>	23
49. Independence, resources, capacity and powers of national human rights institutions ('NHRIs'), of ombudsman institutions if different from NHRIs, of equality bodies if different from NHRIs and of supreme audit institutions.....	23
50. Statistics/reports concerning the follow-up of recommendations by National Human Rights Institutions, ombudsman institutions, equality bodies and supreme audit institutions in the past two years.	23
<i>C. Accessibility and judicial review of administrative decisions</i>	24
51. Transparency of administrative decisions and sanctions (incl. their publication and rules on collection of related data).....	24
52. Judicial review of administrative decisions: - short description of the general regime (in particular competent court, scope, suspensive effect, interim measures, and any applicable specific rules or derogations from the general regime of judicial review).	25
53. Follow-up by the public administration and State institutions to final (national/supranational) court decisions, as well as available remedies in case of non-implementation.....	25
<i>D. The enabling framework for civil society</i>	26
54. Measures regarding the framework for civil society organisations and human rights defenders (e.g. legal framework and its application in practice incl. registration and dissolution rules) 26	
55. Rules and practices having an impact on the effective operation and safety of civil society organisations and human rights defenders. This includes measures for protection from attacks – verbal, physical or on-line –, intimidation, legal threats incl. SLAPPs, negative narratives or smear campaigns, measures capable of affecting the public perception of civil society organisations, etc. It also includes measures to monitor threats or attacks and dedicated support services.....	26
56. Organisation of financial support for civil society organisations and human rights defenders (e.g. framework to ensure access to funding, and for financial viability, taxation/incentive/donation systems, measures to ensure a fair distribution of funding).....	26
57. Rules and practices on the participation of civil society organisations and human rights defenders to the decision-making process (e.g. measures related to dialogue between authorities	

and civil society, participation of civil society in policy development and decision-making, consultation, dialogues, etc.)..... 27

E. Initiatives to foster a rule of law culture 27

58. Measures to foster a rule of law culture (e.g. debates in national parliaments on the rule of law, public information campaigns on rule of law issues, contributions from civil society, etc.) ... 27

I. Justice System

1. Please provide information on measures taken to follow-up on the recommendations received in the 2022 Report regarding the justice system (if applicable)

The existing multiannual agreement on the financing of the Danish judicial system (2019-2022) expired by the end of 2022.

The former government proposed to make an extension of the judiciary's budget from 2022 to 2023 on the 2023 budget proposal, including the extraordinary efforts provided to address the caseload and to limit an increase in the processing time of cases in the courts. The extension was intended to ensure stability of the judiciary's budget in 2023 and provide sufficient time to gather the necessary knowledge and decision-making basis for a new multi-year agreement.

It is stated in the new government platform *Ansvar for Danmark* (Responsibility for Denmark) that the processing time at the courts is too long, which challenges the legal security for both the injured parties and the accused. It is also stated that the government will reduce the processing time at Danish courts by, inter alia, simplifying legal proceedings.

A. Independence

2. Appointment and selection of judges, prosecutors and court presidents (incl. judicial review)

Reference is made to the Danish contributions to the Annual Rule of Law Reports 2020 and 2021.

3. Irremovability of judges; including transfers (incl. as part of judicial map reform), dismissal and retirement regime of judges, court presidents and prosecutors (incl. judicial review)

Reference is made to the Danish contribution to the Annual Rule of Law Report 2020 and 2021.

Prosecutors are included in the collective labour agreement 2021 for academic staff employed by the State. Among other things, the agreement provides rules for dismissal and retirement regimes for employees in the State sector. According to the agreement, prosecutors are covered by the Salaried Employees Act (*funktionærloven*) when it comes to dismissals. The Salaried Employees Act provides prosecutors a term of notice between one to six months depending on the length of service.

As far as the retirement regime of prosecutors goes, the employer pays a pension contribution in the amount of 17.1 % of the salary. A third of the contribution is the contribution of the prosecutor, cf. Section 10(1) of the agreement. Unlike judges, prosecutors are not automatically dismissed when they reach a certain age. The specific age for when a prosecutor is entitled to pension varies, depending on the prosecutor's year of birth.

As for transfers, a rotation scheme is a natural part of the road of education to becoming a prosecutor. Upon completion of the initial training, it is mandatory for prosecutors to embark on a two-year rotation scheme with either a regional attorney general (statsadvokat), the Director of Public Prosecutions (Rigsadvokaten), The Danish National Police or the Danish Ministry of Justice.

4. Promotion of judges and prosecutors (incl. judicial review)

Concerning the promotion of judges, reference is made to the Danish contribution to the Annual Rule of Law Report 2020 and 2021.

The Prosecution Service's Career Policy for prosecutors has been changed from January 2023. This means that within the first ten years of employment a Prosecutor has to begin a two-year employment in a Central Authority's Office. This employment can take place in one of the regional State Prosecutor's Offices, The State Prosecutor for Special Crime Unit's Office, The Director of Public Prosecutions' Office, or with The Danish National Police, The Special Crime Unit, The Danish Ministry of Justice or an Office in one of the Authorities under the Ministry. After having completed this two-year employment, the Prosecutor will hold the title of Senior Prosecutor. Further advancement to Special Prosecutor, Deputy Chief Prosecutor or Chief Prosecutor is always subject to a recruitment procedure through a specific job advertisement. Former work experience from institutions under the Ministry of Justice and especially work experience from the Prosecution Service – as well as experience from other institutions – is considered favorably in the final decision of which candidate is the most suitable for the position. There is no appeal system regarding administrative decisions on the employment and promotion of prosecutors, but a prosecutor can bring a case about unfair dismissal to the civil court system.

The Director of Public Prosecutions is appointed by the Queen at the recommendation of the Minister of Justice through the Prime Minister's Office. The appointment is based on a recruitment procedure through a specific job advertisement.

5. Allocation of cases in courts

Reference is made to the Danish contributions to the Annual Rule of Law Reports 2020 and 2021.

6. Independence (including composition and nomination and dismissal of its members), and powers of the body tasked with safeguarding the independence of the judiciary (e.g. Council for the Judiciary)

Reference is made to the Danish contributions to the Annual Rule of Law Reports 2020 and 2021.

7. Accountability of judges and prosecutors, including disciplinary regime and bodies and ethical rules, judicial immunity and criminal/civil (where applicable) liability of judges (incl. judicial review)

Reference is made to the Danish contributions to the Annual Rule of Law Reports 2020 and 2021.

8. Remuneration/bonuses/rewards for judges and prosecutors, including observed changes (significant and targeted increase or decrease over the past year), transparency on the system and access to the information

Reference is made to the Danish contribution to the Annual Rule of Law Report 2022.

9. Independence/autonomy of the prosecution service

Reference is made to the Danish contributions to the Annual Rule of Law Reports 2020 and 2021.

10. Independence of the Bar (chamber/association of lawyers) and of lawyers.

Reference is made to the Danish contributions to the Annual Rule of Law Reports 2020 and 2021.

11. Significant developments capable of affecting the perception that the general public has of the independence of the judiciary

Reference is made to the Danish contributions to the Annual Rule of Law Reports 2020 and 2021.

B. Quality of justice

12. Accessibility of courts (e.g. court/legal fees, legal aid, language)

Reference is made to the Danish contribution to the Annual Rule of Law Report 2022.

13. Resources of the judiciary (human/financial/material)

Table 1 shows that the total use of financial resources in the judiciary was DKK 1,930.3 million in 2021 and DKK 1,939.1 million in 2022. Payroll accounts for more than half of the expenses. This also includes expenses related to buildings and other facilities, e.g. rent.

Table 1
Financial resources in the Courts of Denmark

DKK million (2022 price level)	2021	2022
Payroll	1,243.8	1,271.1
Other expenses	686.5	668.0
- <i>Rent</i>	325.4	354.7
- <i>Other goods and services</i>	324.8	268.7
- <i>Depreciation</i>	36.4	44.6
Total	1.930,3	1.939,1

Note: The figures are not the final accounting figures for 2022, as these will only be available later.

Table 2 shows that the number of full-time employees in the judiciary was 2,076 in 2021 and 2,080 in 2022. The table also shows the distribution of employees by employee groups, of which it can be noted that judges and other legal advisers along with office staff constitute the majority.

Table 2
Human resources in the Courts of Denmark

Full-time employees	2021	2022
Judges and other legal advisers	686	706
Office staff	1,179	1,200
Other personnel	211	174
Total	2,076	2,080

Note: The figures are not the final figures for 2022, as these will only be available later.

The above only includes the financial, material and human resources directly related to the Courts of Denmark (Retterne). Resources related to the Danish Court Administration (Domstolsstyrelsen), The Appeals Permission Board (Procesbevillingsnævnet), and The Land Registration Court (Tinglysningsretten) are not included.

14. Training of justice professionals (including judges, prosecutors, lawyers, court staff)

Reference is made to the Danish contributions to the Annual Rule of Law Reports 2021 and 2022.

15. Digitalisation (e.g. use of digital technology, particularly electronic communication tools, within the justice system and with court users, including resilience of justice systems in COVID-19 pandemic)

Reference is made to the Danish contribution to the Annual Rule of Law report 2021.

In Denmark, it has been possible to use telecommunication via video link for certain court functions for a number of years. By Act No. 166 of 27 February 2016, the Administration of Justice Act's rules on extension of custody hearing with the use of video link have been changed. Today it is the general rule that the prosecutor participates in the hearings via video link. Accordingly, the judge is at the court house, the prosecutor at his or her office and the defense attorney at either the prison/detention centre with the detained person or at the court house. The provision in section 748 b, subsection 3, of the Administration of Justice Act is now worded as follows: "If the accused participates in a hearing on the extension of custody by using telecommunications with a picture, or the accused does not participate in a hearing on the extension of custody, the prosecutor participates in the hearing by using telecommunications with a picture, unless the court exceptionally decides otherwise." The detained person must be present at the courthouse for the preliminary statutory hearing.

An independent program organization has been established for the development of new IT systems to support criminal and probate cases. The budget for the programme is more than 80 million Euro. The purpose of the new systems is to replace the outdated IT systems used by the courts with a more user-friendly, more effective, and future-proof solution. The roll out will be done in 6 releases. The first - a portal for probate cases - in November this year and the last one in 2026.

16. Use of assessment tools and standards (e.g. ICT systems for case management, court statistics and their transparency, monitoring, evaluation, surveys among court users or legal professionals)

Reference is made to section 15 of the Danish contributions to the Annual Rule of Law Report 2021 and the Annual Rule of Law Report 2022.

The case handling systems for criminal cases and some civil cases, such as probate cases, are to be replaced within the next five years.

The performance of all courts, except from the Supreme Court, is evaluated on a monthly basis based primarily on indicators such as: Number of incoming cases, length of proceedings (timeframes), number of resolved cases, number of pending cases, backlogs, and number of weighted cases. For the Supreme Court, this is done on a quarterly basis. For further information see also the annual report published by The Court Administration¹.

17. Geographical distribution and number of courts/jurisdictions (“judicial map”) and their specialisation, in particular specific courts or chambers within courts to deal with fraud and corruption cases.

Reference is made to the Danish contribution to the Annual Rule of Law Report 2021.

C. Efficiency of the justice system

18. Length of proceedings

Reference is made to the Danish contributions to the Annual Rule of Law Reports 2021 and 2022. Regarding statistics on the length of proceedings, reference is made to the European Commission’s European Scoreboard, page 9 ff.²

On 15 December 2021, the government at the time and the political parties Dansk Folkeparti, Socialistisk Folkeparti and Det Konservative Folkeparti reached an agreement on the financing of the Prison and Probation Service for the years 2022-2025. The agreement contains, amongst other things, initiatives aiming to increase the number of prison cells and the number of prison officers and thereby contributing to the reduction of processing time in criminal cases across the criminal justice system.

¹ The annual reports for Danish Courts are available in Danish at <https://domstol.dk/om-os/aarsrapporter/>

² [THE 2022 EU JUSTICE SCOREBOARD \(europa.eu\)](https://ec.europa.eu/euro-justice/euro-scoreboard/)

In April 2021, the government of the time put forward a legislative proposal in order to streamline the processing of criminal cases in Denmark. The proposal was adopted by the Danish Parliament in June 2021 and entered into force on 1 July 2021. The law consists of eight main initiatives aiming to reduce processing time in criminal cases across the criminal justice system.

Likewise, in April 2022, the government at the time put forward a new proposal with additional initiatives aiming to further streamline the processing of criminal cases in Denmark and to further improve investigation. The proposal was adopted by the Danish Parliament in June 2022 and entered into force on 1 July 2022. The law consists of three main initiatives aiming to reduce the processing time in criminal cases across the criminal justice system.

Further reference is made to the answer of question 1.

II. Anti-corruption framework

19. Please provide information on measures taken to follow-up on the recommendations received in the 2022 Report regarding the anti-corruption framework (if applicable)

Regarding the recommendations to introduce rules on ‘revolving doors’ for ministers and on lobbying, and to ensure adequate control of asset declarations submitted by persons entrusted with top executive functions, it may be noted that the general rules of confidentiality, conflict of interest, bribery and rules regarding acceptance of gifts do apply. These rules apply both to civil servants and ministers, and violation of the rules can be sanctioned. Reference is made to the Danish contribution to the Annual Rule of Law Report 2020 and 2021.

Reference is made to question 24 and 58 concerning the recommendation on political party financing and the rules on the political parties framework.

A. The institutional framework capacity to fight against corruption (prevention and investigation / prosecution)

20. List any changes as regards relevant authorities (e.g. national agencies, bodies) in charge of prevention detection, investigation and prosecution of corruption and the resources allocated to each of these authorities (the human, financial, legal, and technical resources as relevant), including the cooperation among domestic authorities. Indicate any relevant measures taken to effectively and timely cooperate with OLAF and EPPO.

Reference is made to the Danish contribution to the Annual Rule of Law Report 2022.

21. Safeguards for the functional independence of the authorities tasked with the prevention and detection of corruption.

Reference is made to the Danish contribution to the Annual Rule of Law Report 2022.

In addition, whistleblower functions are available in both the police and the prosecution service.

As also mentioned in the 2020 Rule of Law report, the Danish anti-corruption rules are based on ethics and integrity, with few regulations and control measures.

Furthermore, employees of Danish government authorities are introduced to and must comply with the guidelines “Code VII – Seven Key Duties for Civil Servants in Central Government”, which clearly state that civil servants are not allowed to receive gifts or other benefits in their professional relations. This is emphasized to all prosecutors throughout their training.

22. Information on the implementation of measures foreseen in the strategic anti-corruption framework (if applicable). If available, please provide relevant objectives and indicators.

Reference is made to the Danish contribution to the Annual Rule of Law Report 2022.

B. Prevention

23. Measures to enhance integrity in the public sector and their application (including as regards incompatibility rules, revolving doors, codes of conduct, ethics training). Please provide figures on their application.

Reference is made to the Danish contributions to the Annual Rule of Law Reports 2020 and 2021. In addition, it may be noted that figures on the application or the enforcement of the mentioned rules are not available.

24. General transparency of public decision-making, including rules on lobbying and their enforcement, asset disclosure rules and enforcement, gifts policy, transparency of political party financing)

Reference is made to the Danish contributions to the Annual Rule of Law Reports 2020 and 2021. In addition, it may be noted that figures on the application or the enforcement of the mentioned rules are not available.

The Danish Parliament with the aid of the Ministry of the Interior and Housing started working on legislation regarding public party financing in 2022. The legislation, which was not brought to parliament prior to the election in 2022, is expected to be renegotiated in the new parliament in the spring of 2023. Among other things, the legislation is expected to introduce criminal sanctions for political parties if they neglect to submit their annual accounts.

Political negotiations concerning private political party financing will be postponed until after the legislation regarding public party financing has been passed. The negotiations are expected to result in legislation regarding certain circumventions of transparency in political party financing.

The Danish government remains mindful of further potential improvements of issues concerning transparency of political party financing.

25. Rules and measures to prevent conflict of interests in the public sector. Please specify the scope of their application (e.g. categories of officials concerned)

Reference is made to the Danish contribution to the Annual Rule of Law Reports 2020 and 2021. In addition, it may be noted that figures on the application or the enforcement of the mentioned rules are not available.

26. Measures in place to ensure whistleblower protection and encourage reporting of corruption.

Reference is made to the Danish contributions to the Annual Rule of Law Reports 2021 and 2022.

In relation to the Danish contribution to the Annual Rule of Law Report 2022 it is further noted that the material scope of the Directive (EU) 2019/1937 on the protection of persons who report breaches of Union Law is limited to breaches of specific areas of Union law cf. Article 2 (1) of the directive. However, to ensure a comprehensive and coherent legal basis of protection of the whistleblower in national law, the material scope of the Whistleblower Act also includes serious breaches of national law and Union law and other serious matters.

27. List the sectors with high-risks of corruption in your Member State and list the relevant measures taken/envisaged for monitoring and preventing corruption and conflict of interest in these sectors (e.g. public procurement, healthcare, citizen investor schemes, risk or cases of corruption linked to the disbursement of EU funds, other), and, where applicable, list measures to prevent and address corruption committed by organized crime groups (e.g. to infiltrate the public sector)

Reference is made to the Danish contribution to the Annual Rule of Law Report 2021.

28. Any other relevant measures to prevent corruption in public and private sector

Reference is made to the Danish contributions to the Annual Rule of Law Reports 2020 and 2022.

C. Repressive measures

29. Criminalisation, including the level of sanctions available by law, of corruption and related offences, including foreign bribery.

Reference is made to the Danish contribution to the Annual Rule of Law Report 2021.

30. Data on investigation and application of sanctions for corruption offences, including for legal persons and high level and complex corruption cases) and their transparency, including as regards to the implementation of EU funds.

The Director of Public Prosecution has updated the data regarding corruption.

Please note that the numbers are based on data from the police case management system (POLSAS). The numbers are therefore subject to some uncertainty, as POLSAS is a case management system and not an actual statistics system. It should be noted that data are dynamic which means that the numbers are not final. The numbers may change due to corrections or delayed updates of the data in POLSAS, new convictions etc. Thus, changes may occur depending on the time of extraction of the information and post-registrations.

The numbers are based on the latest conviction. The conviction may have been appealed in the meantime. Therefore, the convictions are not necessarily final.

Judgements are measured by the number of charges (counts). I.e. how many people per case number that has been judged.

Dismissals are measured by the number of cases, i.e. the number of unique case numbers.

Data is updated on December 10, 2022.

Section	Decision type	2016	2017	2018	2019	2020	2021	2022	Total
Criminal Code section 122 (active bribery)	Dismissals	2	0	2	2	2	1	0	9
	Judgments	3	9	18	5	18	6	33	92
	Withdrawal of charge (specified conditions)	0	0	2	1	0	1	1	5
	Withdrawal of charge	23	2	7	21	7	15	2	77
Criminal Code section 144 (passive bribery)	Dismissals	1	1	3	4	1	6	3	19
	Judgments	0	1	6	2	14	2	35	60
	Withdrawal of charge	4	1	2	13	3	77	3	103
Criminal code section 299 (private sector bribery)	Dismissals	0	2	1	0	0	2	0	5
	Judgments	3	1	0	1	1	5	1	12
	Withdrawal of charge	7	2	0	0	2	11	2	24

31. Potential obstacles to investigation and prosecution as well as to the effectiveness of criminal sanctions of high-level and complex corruption cases (e.g. political immunity regulation, procedural rules, statute of limitations, cross-border cooperation, pardoning)

Reference is made to the Danish contributions to the Annual Rule of Law Reports 2020 and 2022.

32. Information on effectiveness of non-criminal measures and of sanctions (e.g. recovery measures and administrative sanctions) on both public and private offenders.

Reference is made to the Danish contribution to the Annual Rule of Law Report 2022.

III. Media freedom and pluralism

33. Please provide information on measures taken to follow-up on the recommendations received in the 2022 Report regarding media freedom and pluralism (if applicable)

On the recommendation to continue the process geared at reforming the Access to Public Administration Files Act, reference is made to question 42.

A. Media authorities and bodies

34. Measures taken to ensure the independence, enforcement powers and adequacy of resources (financial, human and technical) of media regulatory authorities and bodies

Reference is made to the Danish contributions to the previous Annual Rule of Law Reports.

35. Conditions and procedures for the appointment and dismissal of the head /members of the collegiate body of media regulatory authorities and bodies

Reference is made to the Danish contributions to the previous Annual Rule of Law Reports.

36. Existence and functions of media councils or other self-regulatory bodies

Reference is made to the Danish contributions to the previous Annual Rule of Law Reports.

B. Safeguards against government or political interference and transparency and concentration of media ownership

37. Measures taken to ensure the fair and transparent allocation of state advertising (including any rules regulating the matter)

Reference is made to the Danish contributions to the previous Annual Rule of Law Reports.

38. Safeguards against state /political interference, in particular:
-safeguards to ensure editorial independence of media (private and public)
-specific safeguards for the independence of heads of management and members of the governing boards of public service media (e.g. related to appointment, dismissal), safeguards for their operational independence (e.g. related to reporting obligations and the allocation of resources) and safeguards for plurality of information and opinions
- information on specific legal provisions and procedures applying to media service providers, including as regards granting/renewal/termination of licences, company operation, capital entry requirements, concentration, and corporate governance

Reference is made to the Danish contributions to the previous Annual Rule of Law Reports.

39. Transparency of media ownership and public availability of media ownership information, including on direct, indirect and beneficial owners as well as any rules regulating the matter

Reference is made to the Danish contributions to the previous Annual Rule of Law Reports.

C. Framework for journalists' protection, transparency and access to documents

40. Rules and practices guaranteeing journalist's independence and safety, including as regards protection of journalistic sources and communications

Reference is made to the Danish contribution to the Annual Rule of Law Report 2020.

Furthermore, it can be added that in December 2021 an amending act that implemented certain changes to the Criminal Code was adopted.³ The amending act, among other things, doubled the punishment for threats, including digital threats, aimed to prevent the aggrieved party from making use of his or her freedom of speech and participating in the democratic debate, or have a background in the aggrieved party's lawful expressions in the public debate.

³ The amending act is available in Danish: [Lov om ændring af straffeloven, retsplejeloven, hvidvaskloven og forskellige andre love \(Implementering af initiativer i aftale om politiets og anklagemyndighedens økonomi 2021-2023, herunder etablering af National Enhed for Særlig Kriminalitet\) \(retsinformation.dk\)](#)

41. Law enforcement capacity, including during protests and demonstrations, to ensure journalists' safety and to investigate attacks on journalists

Reference is made to the Danish contribution to the Annual Rule of Law Report 2020.

42. Access to information and public documents (incl. transparency authorities where they exist, procedures, costs/fees, timeframes, administrative/judicial review of decisions, execution of decisions by public authorities, possible obstacles related to the classification of information)

Reference is made to the Danish contributions to the Annual Rule of Law Reports 2020, 2021 and 2022.

With regards to the political negotiations regarding a possible revision of the Access to Public Administration Files Act, the newly formed Government of Denmark announced in December 2022 that it wishes to establish an expert committee to prepare a proposal for a revised Access to Public Administrations Files Act, that will give the public better opportunities for insight into political decision-making processes.

43. Lawsuits (incl. SLAPPs - strategic lawsuits against public participation) and convictions against journalists (incl. defamation cases) and measures taken to safeguard against manifestly unfounded and abusive lawsuits

Reference is made to the Danish contribution to the Annual Rule of Law Report 2022.

IV. Other institutional issues related to checks and balances

44. Please provide information on measures taken to follow-up on the recommendations received in the 2022 Report regarding the system of checks and balances (if applicable)

Not Applicable.

A. The process for preparing and enacting laws

45. Framework, policy and use of impact assessments and evidence based policy-making, stakeholders'11/public consultations (particularly consultation of judiciary and other relevant stakeholders on judicial reforms), and transparency and quality of the legislative process

Reference is made to the Danish contributions to the Annual Rule of Law Reports 2020 and 2021.

It can be added that the government platform “Responsibility for Denmark” of December 2022 states that the government will emphasize public consultations on bills and will have focus on the observance of the four-week period for public consultation as the main rule.⁴

46. Rules and use of fast-track procedures and emergency procedures (for example, the percentage of decisions adopted through emergency/urgent procedure compared to the total number of adopted decisions)

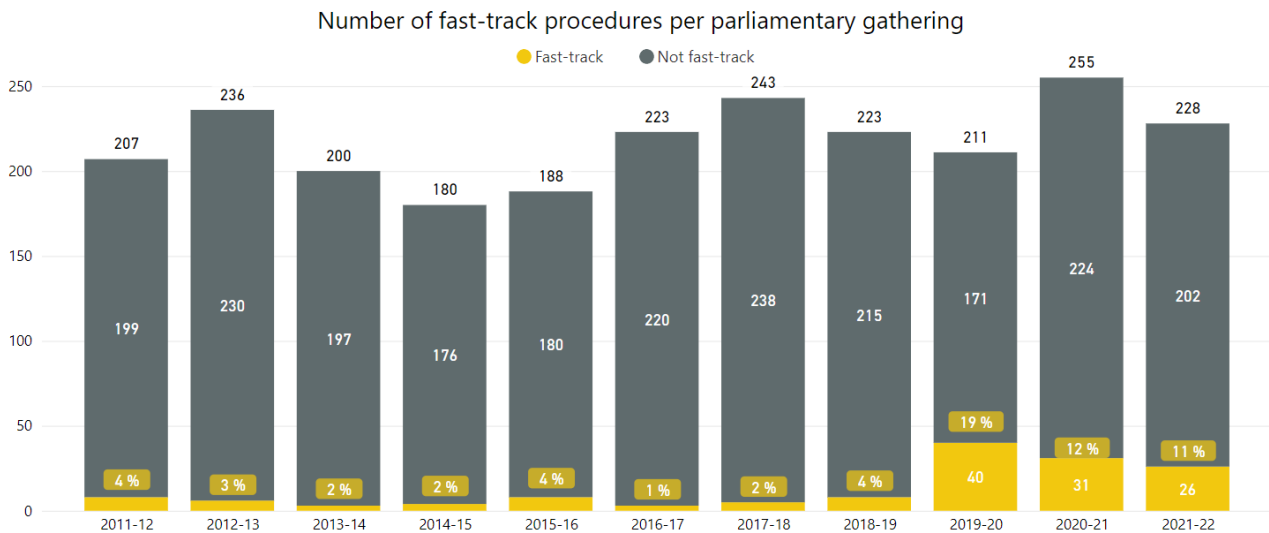
Reference is made to the Danish contributions to the Rule of Law Reports 2020 and 2021 concerning the possibility of using a “fast track procedure” in cases of extreme urgency. Reference is also made to the 2021 as well as the 2022 Rule of Law Report Country Chapter on the rule of law situation in Denmark concerning the report by the Standing Orders Committee of the Parliament adopted on March 24 2021 and the proposition herein of a number of guidelines for the use of fast-track procedures.

As mentioned in the Danish contribution to the Rule of Law Report 2022, the rules for the Parliament’s consideration of bills are laid out in the Constitutional Act and the Standing Orders of the Parliament, including specific time limits for the legislative work.⁵ A bill must be read three times in Parliament before it can be adopted. The third and final reading shall take place no earlier than 30 days after the introduction and no earlier than 2 days after the second reading has been concluded, cf. section 13 of the Standing Orders of the Parliament. In cases of extreme urgency, it is possible to derogate from the time limits of the Standing Orders of the Parliament, cf. *section 42, if consent is given by at least three fourths of the voting members of the Parliament.*

⁴ The *governments joint program statement “Responsibility for Denmark”* is available in Danish at <https://www.stm.dk/media/11768/regeringsgrundlag-2022.pdf>

⁵ The Constitution and the Standing Orders of the Parliament are available in English at https://www.ft.dk/-/media/sites/ft/pdf/publikationer/engelske-publikationer-pdf/grundloven_samlet_2018_uk_web.ashx and https://www.ft.dk/-/media/sites/ft/pdf/publikationer/engelske-publikationer-pdf/forretningsorden_engelsk_2018_samlet_web.ashx.

It follows from the government platform “Responsibility for Denmark” of December 2022 that the government will provide fast track legislative proposals with a sunset clause of six months, if it serves a legitimate aim.⁶



Note: The data contains bills that have the status of ratified or adopted. Fast-track procedures are defined as bills whose processing time from the day after submission to the 3rd reading is less than 30 days. Bills that have the status of ratified or adopted, but do not contain either a submission date or 3rd reading date are included in the data as "Not fast-track". If a bill is divided into sub-bills (A, B and C version), only the divided versions of the initial bill are included. Due to ft.dk's registration practice, the submission date for a bill does not appear on divided bills, but only on initial bills. For this reason, the submission date for divided bills is obtained from the initial bill. Bills are grouped by parliamentary session (first Tuesday in October to the day before the next first Tuesday of October). Data is dynamic and reflects data on ft.dk at the time data is obtained. Any registration errors and deficiencies on ft.dk are thus also represented in this statement. Source: www.ft.dk 2023-01-02.

For the periods 2019-2020 and 2020-2021, the increase in bills adopted within 30 days after their proposal is in particular due to the COVID-19-crisis. The Danish rule that at least $\frac{3}{4}$ of the voting members of the Parliament have to consent to the use of the fast-track procedure as referred to above ensures that these bills are adopted faster due to a broad political backing.

47. Regime for constitutional review of laws

Reference is made to the Danish contribution to the Annual Rule of Law Report 2020.

⁶ The governments joint program statement “Responsibility for Denmark” is available in Danish at <https://www.stm.dk/media/11768/regeringsgrundlag-2022.pdf>

48. COVID-19: provide update on significant developments with regard to emergency regimes/measures in the context of the COVID-19 pandemic
- judicial review (including constitutional review) of emergency regimes and measures in the context of COVID-19 pandemic
- oversight (incl. ex-post reporting/investigation) by Parliament of emergency regimes and measures in the context of COVID-19 pandemic
- processes related to lessons learned/crisis preparedness in terms of the functioning of checks and balances

On judicial review, reference is made to the Danish contributions to the annual Rule of Law reports 2021 and 2022.

Oversight (incl. ex-post reporting/investigation) by Parliament of emergency regimes and measures in the context of COVID-19 pandemic

As mentioned in the Danish contribution to the Annual Rule of Law Report 2021 and 2022, the Danish Parliament passed a new Epidemic Act on February 23rd 2021.

The new Epidemic Act contains a new set-up designed to provide more transparency and involvement of the Danish Parliament when handling COVID-19 and other future epidemics. For a detailed description of the new set-up, reference is made to the Danish contribution to the Annual Rule of Law Report 2021.

Measures in the context of the COVID-19 pandemic have since 1 March 2021 been implemented in accordance with the new set-up in the Epidemic Act passed on 23 February 2021. As described in the Danish contribution to the Annual Rule of Law Report 2021 and 2022, an executive order on vital and extensive areas enabled in the Epidemic Act must be presented to the appointed Epidemics Committee before it is issued, according to section 9. However, in cases of immediate danger or threats to public health, the consultation with the Epidemics Committee regarding an executive order can be postponed until after the order has been issued, as long as the consultation takes place at the earliest possible date hereafter. This derogation from the general legislative procedure in the Epidemic Act, has not been used. The Danish government has evaluated the authorities' experiences with the use of the new Epidemic Act in "Report on the application of the Epidemic Act", that was sent to the Danish Parliament in October 2021. The report has been subject to a public consultation. The responses to the consultation were sent to the Epidemics Committee that undertakes parliamentary scrutiny of Ministers' application of the provisions in the Epidemics Act, cf. Sections 9-11 in February 2022. The report and answers from the public consultation has provided a foundation for a debate in the Epidemics Committee.

The debate emphasized the need for a broader involvement of health professionals and social scientists in the Epidemic Committee's work, as well as a need for more openness about the committee's discussions and advice. In compliance with this feedback the executive order on rules of procedure for the Epidemic Committee was amended from October 1st 2022. This specifies that the committee may

invite professional experts to participate in meetings and that advice from the committee must contain a nuanced description of the discussions behind it.

Processes related to lessons learned/crisis preparedness in terms of the functioning of checks and balances

Based on e.g. the lessons learned from the beginning of the pandemic the new Epidemic Act from February 2021 is not only designed to provide more transparency and involvement of the Danish Parliament but also provides a higher court and appeal access in connection with certain restrictions that under further conditions may be introduced in accordance with the law. A greater legal certainty is thereby introduced.

B. Independent authorities

49. Independence, resources, capacity and powers of national human rights institutions ('NHRIs'), of ombudsman institutions if different from NHRIs, of equality bodies if different from NHRIs and of supreme audit institutions

Danish Institute for Human Rights

Reference is made to the Danish contributions to the Annual Rule of Law Reports 2020 and 2022.

The Board of Equal Treatment

Reference is made to the Danish contributions to the Annual Rule of Law Reports 2020 and 2022.

The Parliamentary Ombudsman

Concerning the functioning of the Parliamentary Ombudsman, reference is made to the Danish contribution to the Annual Rule of Law Report 2020.

According to the Appropriation Act of 2022, Section 3, the Parliament allocated DKK 95.3 million DKK in annual funding of the Ombudsman institution in 2022.⁷

50. Statistics/reports concerning the follow-up of recommendations by National Human Rights Institutions, ombudsman institutions, equality bodies and supreme audit institutions in the past two years.

Danish Institute for Human Rights

Reference is made to the Danish contribution to the Annual Rule of Law Report 2022.

⁷ The Appropriation Act of 2022 is accessible in Danish at this link: <https://fm.dk/media/25454/fl22a.pdf>

The Board of Equal Treatment

The Board of Equal Treatment's annual report 2021⁸ contains summaries of decisions that the board has made during 2021, and articles focusing on topics from the past year on e.g. insurance companies practice regarding claims related to pregnancy and childbirth and gender quotas in political parties. In addition, the annual report contains statistics on, e.g. the number of cases received in the Board of Equal Treatment, the number of decided cases in the Equal Treatment Board and the number of cases distributed by the outcome of the case.

The Parliamentary Ombudsman

According to the Ombudsman's annual report of 2021⁹, the institution handled a total of 5,587 cases of which 815 cases led to an investigation (200 full investigations and 615 shortened investigations). 78 of those (full) investigations led to criticism, formal or informal recommendations etc. Consolidated figures on the follow-up by public authorities of such recommendations do not exist. However, as stated in the Annual Rule of Law Report 2020, public authorities in practice adhere the Ombudsman's recommendations.”

C. Accessibility and judicial review of administrative decisions

51. Transparency of administrative decisions and sanctions (incl. their publication and rules on collection of related data)

With regards to judicial review of administrative decisions, it is possible to bring an administrative decision before the court. The judiciary's control with the administration is laid down in section 63(1) of the Constitution, which states as follows:

“The courts of justice shall be empowered to decide any question relating to the scope of the executive's authority; though any person wishing to question such authority shall not, by taking the case to the courts of justice, avoid temporary compliance with orders given by the executive authority.”

The courts conduct a judicial review, i.e. scrutiny of whether the decision by the administration has the adequate legal basis and falls within the authority's competence, and if the rules for case handling has been respected. The court may annul administrative decisions and return the decision to the specific authority (cassation) or replace the administrative decision with a new. However, the courts are generally reluctant when it comes to reviewing the more discretionary powers of the authorities. Reference is made to the common core document on Denmark, page 23 and 34, section 96 and 149¹⁰.

⁸ The report is available in Danish at this link: <https://ast.dk/publikationer/ligebehandlingsnaevnets-arsberetning-2021>.

⁹ https://en.ombudsmanden.dk/publications/annual_reports/annual_report_2021/

¹⁰ Available at https://www.ecoi.net/en/file/local/2004329/hri_core_dnk_2018_E.pdf

As for publication of administrative decisions, as a main rule, administrative practice is communicated to the parties of the specific administrative decision. However, general publication of administrative decisions are within some special areas conveyed. As an example, The Consumer Ombudsman has the right to publish decisions of general interest or of significance to the understanding of provisions in the Marketing Practices Act, cf. section 2 of executive order No. 1249 of 25 November 2014. Another example is the area of competition law, where the Competition and Consumer Authority shall publish decisions made under the competition Act, decisions on behalf of the Competition and Consumer Authority etc., as stated in section 13 of the Competition Act.

Within the area of administrative law, section 18 of the Access to Public Administration Files Act the Ministry of Justice is responsible for a website, which contains laws, administrative provisions, parliamentary bills and the Parliamentary Ombudsman's statements regarding right of access to public administration files. Pursuant to this obligation, the website www.offentlighedsportalen.dk has been implemented. The website is continuously updated by the Department of Civil Affairs under the Ministry of Justice.

As for accessibility of decisions by the courts, these are available to anyone according to the Act on Court Fees against a court fee of DKK 150.¹¹ As for accessibility of legal proceedings in Denmark, which is guaranteed by section 65 of the Constitution, reference is made to the common core document on Denmark, page 34, section 142.

52. Judicial review of administrative decisions: - short description of the general regime (in particular competent court, scope, suspensive effect, interim measures, and any applicable specific rules or derogations from the general regime of judicial review).

Reference is made to the Danish contributions to the Annual Rule of Law Reports 2020 and 2022.

53. Follow-up by the public administration and State institutions to final (national/supranational) court decisions, as well as available remedies in case of non- implementation

Reference is made to the Danish contributions to the Annual Rule of Law Report s2020 and 2021.

¹¹ The act is available in Danish at <https://www.retsinformation.dk/eli/lta/2021/425>

D. The enabling framework for civil society

54. Measures regarding the framework for civil society organisations and human rights defenders (e.g. legal framework and its application in practice incl. registration and dissolution rules)

Reference is made to the Danish contributions to the Annual Rule of Law Reports 2020, 2021 and 2022.

55. Rules and practices having an impact on the effective operation and safety of civil society organisations and human rights defenders. This includes measures for protection from attacks – verbal, physical or on-line –, intimidation, legal threats incl. SLAPPs, negative narratives or smear campaigns, measures capable of affecting the public perception of civil society organisations, etc. It also includes measures to monitor threats or attacks and dedicated support services.

Reference is made to the answer to question 40 and question 54.

56. Organisation of financial support for civil society organisations and human rights defenders (e.g. framework to ensure access to funding, and for financial viability, taxation/incentive/donation systems, measures to ensure a fair distribution of funding)

The municipalities are the primary providers of funding to civil society organisations (folkeoplysende foreninger). The criterias that civil society organisations must fulfill to receive funding are outlined in the law "folkeoplysningsloven". Civil society organisations that do not fulfill the criteria laid down in "folkeoplysningsloven" may receive funding based on unwritten principles of law ("kommunalfuldmagten").

Furthermore, section 18 in the Act on Social Service requires the municipalities to financially support voluntary social work and hereby possibly civil society organizations. The municipalities are financially compensated for this in the form of an extra general grant (block grant) from the Government.

Civil society organisations are in most cases members of main organisations for example "Danmarks Idrætsforbund" and "Dansk Ungdoms Fællesråd". These main organisations receive funding from the state. How funds to the main organisations are distributed is outlined in the law "udlodningsloven" and the annual Financial Act ("finansloven"). Governmental agencies disburse public funding to civil society organizations in various policy areas for example through discretionary grants. Civil society organizations are able to receive funding from the state for both operational and developmental purposes.

The Danish Institute of Human Rights

As stated in the Danish contribution to the Annual Rule of Law Report 2022, Denmark provides financial support to both the national and international work of The Danish Institute of Human Rights. The Institute's national work was financed with an allocation of DKK 42.7 million in 2022. Further reference is made to the Danish contribution to the Annual Rule of Law Report 2022 question 46.

Taxation

Civil society organisations are exempted from taxation to the extent that they do not conduct business activities.

Donations to certain civil society organisations that fulfil criteria on, inter alia, their structure, purpose and financing, and which are approved by the Danish Tax Authority, are deductible in the determination of taxable income. Regardless of whether the donations are spread out among different certain approved civil society organizations, the maximum deductible amount per year is DKK 17,700 (in 2023).

Approved civil society organisations may also be exempt from property tax.

57. Rules and practices on the participation of civil society organisations and human rights defenders to the decision-making process (e.g. measures related to dialogue between authorities and civil society, participation of civil society in policy development and decision-making, consultation, dialogues, etc.)

As stated in the Danish response to question 45, rules and practices are in place in order to ensure the participation of civil society organisations and human rights defenders to the decision-making process. Reference is made to the Danish contributions to the Annual Rule of Law Reports of 2020 and 2022 regarding the process for preparing and enacting laws.

E. Initiatives to foster a rule of law culture

58. Measures to foster a rule of law culture (e.g. debates in national parliaments on the rule of law, public information campaigns on rule of law issues, contributions from civil society, etc.)

The Danish Court Administration has created a number of initiatives aiming at enhancing and supporting the knowledge of the Danish justice system and hence aid to maintain the high level of trust that the population has in the court system.

Examples of this is a learning website named www.kenddinret.dk, which is a modern learning universe with digital teaching courses for both high school pupils and secondary school pupils.

The website is a mixture of information, videos, web-stories, audio narration, role-plays, quizzes, and tasks displayed and written in a way which should be relevant to young people's everyday life. The variety of educational tools should strengthen the students' attention and commitment, while at the same time adhering to the Ministry of Children and Education's educational goals on the Danish legal system.

The learning universe is primarily aimed at students and teachers, but it is available for all citizens to explore and learn more about the court system.

Another initiative is a podcast series named “Thi kendes for ret” (would translate into “And the verdict is”) in which three appeal court judges talk listeners through real commercial law court cases explaining and discussing the relevant legal issues.

In the podcast series, the focus is on a selection of the many important business cases that the courts deal with every day - both well-known and lesser-known cases. The podcast series aims at giving insight into the work of the courts and into legal practice with the ambition that it will increase knowledge of the work of the courts. The cases selected for the series are all commercial law cases but represent many different aspects of the law such as a trademark law infringement and a worker's compensation case.

Finally, the Danish Courts Administration developed Denmark's contribution to the Council of Europe's "European Day of Justice" on 25 October 2022. The contribution is “Domsmandsspillet” (the Court Game), which is a virtual game about guilt and punishment, in which anyone can experiment being a lay judge and assess whether a defendant is guilty or not.

In the Court Game, participants are summoned as a lay judge in a criminal case in the district court. A lay judge is an ordinary citizen who sits in court cases and, together with the legal judge, assesses whether a defendant is guilty or not. They also decide the punishment. They do this as a representative of the population to ensure that there is popular support when a decision has to be made on the most serious sanction; the deprivation of freedom from the individual human being.

The latest studies show that, young people and unskilled persons are underrepresented as lay judges in the court system. The aim of the game is also to inspire those groups to sign up for possible selection as a lay judge.

There is a strong rule of law culture within the Danish court system both systemically and as regards the individual judges. The rule of law is an ever-present consideration in all the work performed at the courts. A specific example of an event at which general and more specific topics related to the rule of law are debated is the annual Democratic Festival of Denmark (Folkemødet). Every year the festival is the platform for democratic dialogue between civil society, politicians, business, media, universities, and citizens at large.

With more than 2000 political events created by 650 different organizations the Democracy Festival of Denmark has become an important democratic event in Denmark with the purpose of creating informal meetings and dialogue between decision makers and citizens. More than 50,000 citizens, parliamentarians, NGOs, business representatives and grassroots meet up and debate our society and celebrate our democracy during the four-day festival in June. There is no entrance fee to any events.

At the 2022 Democratic Festival the Danish Court Administration had a wide programme of debate and interaction between members of the public, decision makers, judges etc. including a mock trial and debates on data ethics and the protection of the citizens' data all of which support the strong rule of law culture.

Further reference is made to the Danish contributions to the Annual Rule of Law Reports 2021 and 2022.

In the Danish contribution to the Annual Rule of Law Report 2022 it is stated that Parliament set up the first commission of scrutiny to investigate the culling of mink (Granskningskommissionen om sagen om aflivning af mink). The Commission delivered its report on 30 June 2022.¹²

The election for Parliament in 2022 furthermore gave rise to public debates regarding transparency in private party financing among both politicians and civil society, which are expected to continue in 2023.

Political negotiations about political party financing, which are planned for 2023, and subsequent legislation are expected to result in further debates in the public and in Parliament concerning transparency of political party financing, and transparency in politics in general.

¹² The report is available on <https://www.ft.dk/samling/20211/almdel/GRA/bilag/46/index.htm>