Systemic disempowerment and Institutional Gaslighting

A Psychological, Legal, and Human Rights White Paper

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Preface

This white paper is written at the intersection of human experience, psychological understanding, legal analysis, and human rights necessity. It arises from a need to give precise language to a form of strain that many citizens, families, and professionals recognize, but that often disappears into case notes, administrative procedures, deadlines, complaint processes, and public authorities' internal explanatory models.
The concept behind the white paper took shape after Ole Bakkestrøm underwent a psychological debriefing with Ronnie Kristensen. Through that debriefing, it became clear how prolonged encounters with public systems can create a particular form of strain in which a person not only loses agency but gradually has their ability to have their reality recognized, corrected, and tested against the facts weakened. Based on this process, Ole Bakkestrøm recognized an overarching pathology of authority: a recurring pattern in which public systems, through silence, fragmentation, omissions, selective documentation, self-protective narratives, and weakened contradiction, may come to maintain an understanding of reality that the citizen is not genuinely given an opportunity to correct.

This white paper uses *systemic disempowerment* to describe the fundamental loss of effect that can arise when a person repeatedly tries to create contact, clarification, help, or correction, but is met with silence, uncertainty, displacement of responsibility, fragmentation, or responses without real consequence. *Institutional gaslighting* is used to describe the intensified mechanism in which an authority or institution over time produces, maintains, or recirculates a one-sided, inaccurate, or insufficiently reality-tested narrative while the citizen's ability to correct that narrative is weakened. The paper's basic distinction is therefore simple: systemic disempowerment concerns the loss of effect, while institutional gaslighting concerns the loss of reality correction.

After the first draft of the white paper was prepared, the concepts, structure, and legal usability were qualified through feedback from the think tank the Legal Safeguards Observatory for Power and Behavior. This feedback contributed especially to strengthening the precision, delimitation, and applicability of the concept in a legal and analytical context. In parallel, Ronnie Kristensen wrote the section of the white paper on systemic disempowerment, drawing on psychological practice, Nature-Centered Human Development Theory (NMU), and experience with people who are burdened by systems that no longer function as regulating and holding fields. The two tracks were subsequently merged into one combined white paper in which the psychological analysis of systemic disempowerment and the legal-human-rights analysis of institutional gaslighting illuminate one another.

The white paper was not written to diagnose specific individuals or decide specific cases. It was written to give citizens, lawyers, psychologists, professionals, managers, oversight authorities, and decision-makers a conceptual framework, an analytical model, an evidence matrix, and practical tools for identifying patterns that otherwise often dissolve into dissatisfaction with individual cases, misunderstandings, cooperation difficulties, or ordinary administrative errors.

A central aim is to move the analysis from subjective experience to documentable patterns. Institutional gaslighting must not be understood as a loose rhetorical accusation, but as a possible objective effect of authority behavior when case processing, documentation, and decision chains collectively weaken a citizen's access to effective contradiction, reality correction, and legal safeguards. The decisive point is therefore not necessarily to prove malicious intent by individuals, but to examine whether the system's overall practice produces or maintains a narrative that has not been sufficiently reality-tested and that the citizen cannot genuinely correct.

This white paper is written with respect for the people who have experienced what it means to lose effect in the encounter with the system. It is also written with respect for professionals who want to understand and repair structures that can cause harm even when no one necessarily intended to harm anyone. The ambition is not to exaggerate. The ambition is to be precise. Because only what can be described clearly can be examined. And only what can be examined can be corrected.

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Reader’s Guide

The conceptual hierarchy is maintained throughout the white paper: *systemic disempowerment* is the framework concept, *institutional distortion of reality* is the intermediate stage, and *institutional gaslighting* is the intensified mechanism in which distortion of reality is combined with power asymmetry, credibility undermining, and weakened opportunity for correction.

Part I – Overall Conceptual Framework and Method

1 Summary and Main Conclusion

Systemic disempowerment means a field-conditioned psychological, physiological, relational, and legally relevant state that arises when a person repeatedly attempts to create contact, clarification, correction, movement, or effect in a system, but is met with silence, uncertainty, displacement of responsibility, fragmented case processing, rhythmless processes, or responses without real consequence.
Rhythm, regulation, and effect are source-anchored in this white paper through Bowlby's attachment theory (Bowlby, 1969/1982), Stern's descriptions of affective timing and response (Stern, 1985), Schore's and Siegel's affect regulation (Schore, 1994; Siegel, 1999), Porges' and Dana's work on autonomic regulation (Porges, 2011; Dana, 2018), McEwen's and Sapolsky's stress and allostasis research (McEwen, 1998; Sapolsky, 2004), Craig's and Damasio's work on interoception and bodily self-sense (Craig, 2002; Damasio, 1994), Leontiev's activity theory (Leontiev, 1978), Gibson's, Maturana & Varela's, and Fuchs' organism-environment perspectives (Gibson, 1979; Maturana & Varela, 1980; Fuchs, 2018), and Rosa's theory of resonance (Rosa, 2019).

Institutional gaslighting means an intensified mechanism within systemic disempowerment, where a public authority or institution over time produces, maintains, or recirculates a one-sided, inaccurate, or insufficiently reality-tested case narrative while the citizen's opportunities to correct that narrative are weakened.

The main conclusion of the white paper is hierarchical: systemic disempowerment is the underlying field; institutional distortion of reality is the intermediate stage; institutional gaslighting is the intensified reality-distorting mechanism.

Systemic disempowerment concerns the loss of effect. Institutional gaslighting concerns the loss of reality correction.

The white paper does not diagnose specific individuals and does not decide specific cases. It offers a conceptual framework, an analytical model, an evidence matrix, and practical tools for identifying and documenting patterns that otherwise often disappear as isolated errors, case notes, waiting time, complaint processes, and symptoms.

1.1 Methodological Status, Knowledge Base, and Delimitation

This methodological section functions as the white paper's academic reading contract. It clarifies what kind of document the white paper is, which forms of knowledge it reads together, which levels of claim it uses, and which limitations follow from the nature of the document.

1.1.1 Document Type

The white paper is not an empirical research article, not a clinical manual, not a legal opinion, and not an authority report. It is an interdisciplinary white paper and theory-developing policy analysis. It brings psychological theory, practice-based experience, legal-safeguards analysis, documentation sources, and normative recommendations into one integrated framework.

This means that the white paper should not be read as final proof for specific individual cases. It should be read as a conceptual, professional, and methodological framework for identifying, documenting, and assessing patterns that otherwise often disappear as separate administrative errors, symptoms, waiting time, journal notes, and complaint processes.

1.1.2 Levels of Knowledge

The white paper works across five different levels of knowledge, which must be kept analytically distinct:

Theory-developing level

Content: NMU, systemic disempowerment, rhythm organism, effect, resonance, self-oscillation, and little-world.

Function: Develops the white paper's original conceptual framework.

Research-based level

Content: Gaslighting, epistemic injustice, institutional betrayal, DARVO, stress physiology, and developmental psychology.

Function: Supports and illuminates the white paper's concepts.

Legal level

Content: Administrative law, data protection, human rights, and effective remedy.

Function: Identifies legal correction mechanisms and thresholds.

Documentation level

Content: The Danish National Audit Office, the Parliamentary Ombudsman, the Public Accounts Committee, Justitia, and official authority sources.

Function: Documents structural risk fields, not conclusions in specific individual cases.

Normative level

Content: Reform proposals, audit models, management tools, and recommendations.

Function: Proposes changes in practice, governance, and responsibility.

1.1.3 Source Hierarchy

Not all sources have the same status. Official authority sources document something different from research literature, clinical classification manuals, or NMU-internal working documents. The white paper therefore distinguishes between primary official sources, legal sources, research sources, clinical classification sources, secondary institutional sources, and NMU-internal theory and working documents.

The Danish National Audit Office, the Public Accounts Committee, and the Ombudsman can document structural conditions and specific authority-critical findings. They cannot, by themselves, prove systemic disempowerment or institutional gaslighting in a specific case. ICD-11 can illuminate clinical symptom areas, but it does not document systemic disempowerment as a diagnosis. NMU sources are practice-based theory development and should therefore be declared as such until they may eventually exist in peer-reviewed or published form. [7], [8], [12]-[14], [16], [39]

Methodological note on source format: The white paper deliberately uses a two-part source practice. Author-year references in the body text are used especially in the psychological and theory-developing sections, where the reader must be able to see the theoretical grounding directly in the text. Numbered notes are used especially in the legal, documentation-oriented, and authority-facing sections, where the source base is collected in the note apparatus.

1.1.4 Analytical Method

NMU concepts are used here as practice-based analytical concepts. They are illuminated through recognized developmental psychology, stress physiology, neuroaffective regulation, activity theory, ecological psychology, and resonance theory, but the white paper does not claim that NMU as a complete theory has been empirically validated. The concepts are therefore used as analytical and documentation tools, not as independent clinical diagnoses or automatic legal conclusions.

The method of the white paper is cross-reading and pattern recognition. It examines how legal correction mechanisms, possible clinical strain effects, documentation sources, and NMU's theory of rhythm, resonance, and effect can illuminate the same problem field from different angles.

The method is not statistical generalization. It is an interdisciplinary synthesis that seeks to describe patterns, thresholds, and mechanisms that can be tested in specific cases through timelines, case-file material, document analysis, clinical assessment, and legal review.

1.1.5 Conceptual Originality

The white paper's original contribution is to connect legal safeguards and regulation. It shows how legal guarantees such as consultation of parties, access to files, reasons for decisions, record-keeping, and rectification are not merely formal rights, but can also

function as mechanisms of rhythm, memory, and correction in a person's encounter with the system.
The white paper also connects case-processing time with bodily strain, documentation power with reality correction, and NMU's concept of effect with legal opportunities for correction. The conceptual hierarchy is therefore central: systemic disempowerment describes the loss of effect, institutional distortion of reality describes a skewed case picture, and institutional gaslighting describes intensified reality distortion with power asymmetry, credibility undermining, and weakened opportunity for correction.

1.2 Human Rights Threshold Reservations

Not every instance of poor case handling, delayed access to files, inadequate consultation of parties, or insufficient reasoning is, in itself, a human rights violation. The white paper uses human rights as a heightened threshold framework, not as an automatic conclusion.
Article 3 of the European Convention on Human Rights, Article 16 of the Convention against Torture, and corresponding international standards should only be brought into play in cases involving duration, significant intensity, massive power asymmetry, documented or probable serious psychological/physical strain, the authority's knowledge or constructive knowledge, and the absence of effective remedies or independent investigation.

This reservation should be read as a safeguard against conceptual overextension: human rights arguments must not be used merely as rhetorical amplification, but must be anchored in concrete documentation, a timeline, case-file material, and legal assessment.

The white paper cannot by itself prove specific individual cases. The concepts of systemic disempowerment and institutional gaslighting cannot be used responsibly without a timeline, case-file material, concrete documentation, assessment of correction opportunities, and possible legal or clinical professional assessment.

Documented systemic problems are not automatically proof of an individual violation. Clinical reactions require concrete professional assessment. Legal conclusions require legal review. The white paper offers an analytical model, not an automatic decision machine.

1.3 The Paradigm the White Paper Breaks With

The white paper breaks with a view of the human being in which the person is primarily understood as function, case, diagnosis, benefit recipient, or object of governance. In NMU, the human being is understood as a *rhythm organism*: biological, physiological, psychological, sensing, relational, and active in the world (Kristensen, 2025; Kristensen, 2026).
The paradigm critique is not directed at professionalism, law, method, documentation, or regulation as such. It is directed at situations in which these become the primary regulators

at the expense of resonance, rhythm, relational holding capacity, actual effect, and a sense of human consequence.

The task of the white paper is therefore not to replace law with feeling or method with spontaneity. The task is to insist that legal form, clinical assessment, and organizational governance must be evaluated according to their actual effects in people's lives.

The white paper is not value neutral. It is based on a view of humanity in which public systems must be assessed by their effects on people's regulation, dignity, legal safeguards, and ability to correct. This normative position is not a hidden premise, but a declared part of the document's purpose.

That the white paper has a normative position does not mean that its empirical, legal, and clinical statements can stand without documentation. It means that its recommendations arise from a clear view of humanity and a commitment to legal safeguards.

1.4 Limitations of the White Paper

The white paper must not be used to conclude automatically that a specific authority, professional, or institution has committed institutional gaslighting. Nor may it be used as a substitute for legal review, clinical diagnostics, or concrete case investigation.
The concepts should not be used as the first words in a complaint if the documentation has not been built. In specific cases, one should begin with a timeline, case-file material, actual breaches, attempts at correction, the authority's responses, and subsequent effects. Only then can the concepts be used as an overall analysis.

Nor may the white paper be used to individualize blame toward frontline employees without analysis of frameworks, management, organization, resources, assignments, documentation requirements, and decision chains.

No independent quantitative study has been conducted.

No systematic review according to research-methodological standards has been carried out.

The white paper is based on interdisciplinary synthesis, theory development, document analysis, and practice-based professional experience.

The concepts require further research, audit testing, and external professional review.

Clinical application requires an independent health-professional assessment.

Legal application requires a concrete legal assessment, documentation, and relevant legal authority.

Conceptual support, external testing, and further research.

Part II – Systemic disempowerment in Public Systems

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2. Systemic disempowerment in Public Systems – A Legal-Analytical Approach

2.1 Definition and Delimitation

In Nature-Centered Human Development Theory (NMU), *systemic disempowerment* denotes a structural field phenomenon in which a person's possibility of having an effect is weakened in the encounter with a system field that no longer carries sufficient rhythm, resonance, continuity, responsibility-bearing, or regulatory holding capacity. Powerlessness does not arise as individual weakness, but in the relation between the rhythm organism and a field where contact, response, direction, or repair no longer has real effect (Kristensen, 2025; Kristensen, 2026; Kristensen, 2026).
In this white paper, systemic disempowerment is operationalized as a documentable pattern in the encounter between citizen and public system, where the citizen repeatedly attempts to create contact, clarification, help, follow-up, correction, or effect without those inquiries leading to real movement in the case, reasoned consideration, responsibility-bearing, or an effective opportunity for correction.

The concept describes the loss of effect in the encounter with the system. In NMU, *effect* is understood as the experienced and field-based effect of a person's action, inquiry, sensing, or expression of need. In an administrative context, effect can be documented through responses, access to information, follow-up, reasoned consideration, correction, review, repair, or actual movement in the case. A distinction is therefore made between formal access to a process and the real effect that process has on the citizen's ability to understand, influence, and have the case corrected.

Systemic disempowerment is not present in ordinary disagreement, isolated errors, reasonable waiting time, lawful prioritization, or errors that are identified and repaired in a timely way. The concept becomes relevant only where, over time, repeated, significant, and insufficiently repaired breaks can be demonstrated in the citizen's ability to create effect, maintain orientation, have responsibility placed, or have errors and inaccurate premises corrected.

In NMU, systemic disempowerment is a canonical Level C concept. It presupposes the Level A concepts of rhythm, rhythm organism, rhythmic field, continuity, and rhythmic integrity, and the Level B concepts of co-regulation, rhythm break, resonance, field regulation, and functional survival. The concept is also linked to the Level C concepts of structural incompatibility, responsibility-bearing, fragmented responsibility, effect, ineffectiveness, system-produced dysregulation, fragmentation logic, and organizational resonance.

Systemic disempowerment is used here as an analytical and documentation tool. It incorporates research-based insights on rhythm, regulation, resonance, and the interaction between organism and field, but it is not a clinical diagnosis, does not in itself constitute proof of health harm, and cannot be used as an automatic legal conclusion. Concrete application requires a timeline, case-file material, documentation of attempts at correction, assessment of the authority's response, and legal or clinical professional assessment.

2.2 Documentable Patterns

To examine systemic disempowerment, there should be concrete and verifiable patterns in the case trajectory. As far as possible, the patterns should be documented through a timeline, case notes, decisions, consultation responses, access-to-file processes, correspondence, meeting minutes, complaint responses, rectification requests, documented deselections, and any refusals to correct.
The following points are not new canonical concepts, but conceptually calibrated links between NMU's canonical concepts and their legal-administrative documentation traces.

1. Effect and Ineffectiveness – Operationally: Documented Loss of Effect

In NMU, *effect* denotes a person's ability to experience that their action, inquiry, expression of need, or sensing has a real impact in the field. Ineffectiveness arises when this relation is broken over time, so that the person acts, reaches out, or tries to correct without the field changing in a way that can be felt or documented.
Operationally, loss of effect can be examined when the citizen's inquiries, reminders, requests, complaints, or objections are received, but do not lead to substantive consideration, follow-up, reasoned consideration, corrective action, repair, or actual movement in the case.

Loss of effect can also appear when procedural rights formally exist but have no practical significance. This is the case, for example, if access to files arrives so late that the citizen cannot genuinely use the information; if consultation of parties is carried out without genuine consideration of objections; if reasons for decisions do not show how significant information has been assessed; or if rectification requests are rejected without concrete review.

2. Rhythm Breaks – Operationally: Temporal, Relational, and Procedural Unpredictability

In NMU, a *rhythm break* denotes a destabilization of the rhythmic coherence that normally supports the organism's orientation, regulation, and effect. Rhythm must not be reduced here to tempo or deadlines. Rhythm is an organizing principle in the organism and the field, while tempo is only one possible parameter within rhythm.

In administrative analysis, rhythm breaks can be examined as documentable breaks in the temporal, relational, and organizational coherence of the case. These may include repeated deadline violations, missing responses, unannounced pauses, shifting contact points, missing follow-up meetings, missing record-keeping, late decisions, unclear next steps, unresolved responsibility between units, or breaks in the continuity of contact.

The concept of rhythm is not used here as metaphor alone, but as an analytical term for coherence, repeatability, predictability, continuity, and procedural holding capacity. In legal and administrative use, rhythm breaks should therefore be translated into concrete breaks in time, responsibility, contact, continuity, and documentation. Rhythm is also understood in continuity with research on circadian rhythm, stress regulation, and autonomic regulation (Foster & Kreitzman, 2004; Czeisler et al., 1999; McEwen, 1998; Sapolsky, 2004; Porges, 2011; Dana, 2018).

3. Organizational Resonance – Operationally: Institutional Responsiveness

In NMU, *resonance* denotes the field's ability to create responses that support regulation, orientation, and effect. Resonance is not the same as emotion, kindness, empathy, or agreement. In a systemic context, resonance concerns whether the field can receive, process, and respond to relevant feedback in a way that has real significance.
In an administrative context, organizational resonance can be examined by whether the authority demonstrably addresses significant objections, gives reasons for disregarding new documentation, corrects proven errors, and tests its own factual premises against case-file material, party information, or later-emerging information.

Weakened organizational resonance appears when the authority does not demonstrably receive, process, or respond to relevant information in a way that is visible in the case material. An authority can certainly disagree with the citizen without losing resonance if the disagreement is concretely reasoned, fairly informed, and genuinely tested. Resonance and loss of resonance are here placed in perspective through Rosa's analysis of resonance as a social dynamic (Rosa, 2019).

4. Responsibility-Bearing and Fragmented Responsibility – Operationally: Organizational Fragmentation and Disconnection from Consequence

In NMU, *responsibility-bearing* denotes the system's ability to carry coherence, consequence, and repair in relation to the person who depends on the system's effect. Fragmented responsibility arises when responsibility, knowledge, follow-up, or consequence assessment is spread across units in a way that makes the whole unclear and weakens the citizen's ability to orient themselves, have errors corrected, or have consequences repaired. Operationally, this can be examined as organizational fragmentation and disconnection from consequence: unclear responsibility, lack of handover, weak coordination, absence of holistic assessment, contradictory messages, documentation breaks, insufficient consequence assessment, and lack of repair.

In such trajectories, decisions, notes, deselections, and actions may become disconnected from their actual human and legal safety consequences. The central question is not only who formally competence had, but whether the system as a whole carried the case in a way that ensured continuity, responsibility, correction, and effect.

5. Paradigmatic Perspective: Culturally Conditioned Dissociation

Culturally conditioned dissociation is a Level D concept in NMU. It should therefore not be treated as a simple case indicator on the same level as deadline violations or missing responses. The concept is used as a paradigmatic and epistemic interpretation of stabilized patterns in which sensing, responsibility, affect, relational after-sense, and human consequence are split off in organizational practice.
When organizational fragmentation, weakened responsibility-bearing, and disconnection from consequence stabilize over time, NMU may understand this as culturally conditioned dissociation. In this white paper, the concept is used analytically and non-diagnostically; it does not denote individual dissociation and is not an ICD-11 diagnosis. It denotes a cultural or organizational splitting-off in which the system loses access to the human functions that normally enable resonance, feedback, sense of consequence, and repair.

In NMU, culturally conditioned dissociation is used both as a concept for understanding splitting-off in organizational systems and in relation to the potential consequences of systemic disempowerment over time, resulting in splitting-off at the level of the individual organism (Kristensen, 2025).

The concept is placed in perspective through Foucault's institutional gaze, Rosa's loss of resonance, Craig's and Damasio's interoception and bodily self-sense, Schore's and Porges' affect regulation, and van der Kolk's and Levine's work on bodily trauma and survival responses (Foucault, 1977; Rosa, 2019; Craig, 2002; Damasio, 1994; Schore, 1994; Porges, 2011; van der Kolk, 2014; Levine, 1997).

In legal and administrative use, culturally conditioned dissociation should primarily be translated into examinable conditions: systematic absence of holistic assessment, unclear responsibility-bearing, self-protective documentation practices, loss of consequence assessment, lack of repair, and persistent disconnection between decision and human effect.

2.3 Legal Correction Opportunities as Institutional Forms of Effect and Responsibility-Bearing

A central characteristic of systemic disempowerment is that the citizen's opportunities for correction are weakened in practice. In NMU terms, legal correction opportunities can be understood as institutional forms of effect, responsibility-bearing, and organizational

resonance. When they function, they give the citizen the ability to see, understand, influence, correct, and have the case reviewed. When they are weakened, the risk of ineffectiveness, fragmented responsibility, and system-produced dysregulation arises.
It should therefore be examined whether the citizen has genuinely had access to file access, consultation of parties, reasons for decisions, rectification, and complaint, and whether the authority has demonstrably addressed significant objections, contradictory information, and requests for correction.

The decisive point is not only whether correction rights formally exist, but whether they have had real effect in the case trajectory. A correction opportunity has limited value if it is provided too late, answered formulaically, does not lead to review of the contested basis, or leaves no visible trace in the subsequent decision or assessment.

Weakened correction opportunities should therefore be documented through concrete questions: When was access to information, consultation, reasons, or rectification requested? When and how did the authority respond? Which information was assessed? Was uncertain or disputed information marked as uncertain or disputed? Are errors corrected? Were consequences repaired? Is there resonance?

This examination should be directed at the authority's overall case trajectory, not at the intentions of individuals. The purpose is to uncover whether the system's correction capacity worked, and whether the citizen's attempts to create effect had documentable significance. When a system cannot receive criticism, integrate new documentation, correct errors, or repair harm, correction capacity and legal safeguards are weakened; this connection can be placed in perspective, among other things, through the literature on institutional betrayal (Smith & Freyd, 2014).

2.4 Legal-Safeguards Relevance, System-Produced Dysregulation, and Threshold Reservations

Systemic disempowerment can be relevant to legal safeguards where a documentable pattern of ineffectiveness, rhythm breaks, weakened organizational resonance, fragmented responsibility, and weakened correction opportunity undermines the citizen's real ability to understand, influence, or have their case reviewed.
In NMU terms, such a pattern can develop into system-produced dysregulation when the system's organization, rhythm, silence, unpredictability, or displacement of responsibility becomes a burdening factor that weakens the citizen's regulation, participation capacity, or functioning. This is not an automatic clinical conclusion, but an analytical hypothesis that requires documentation and relevant professional assessment.

The concept must not be used as rhetorical amplification of ordinary dissatisfaction. Normal waiting time, reasonable prioritizations, isolated administrative errors, misunderstandings that are clarified, and information gaps that are remedied in time are not in themselves sufficient to establish systemic disempowerment.

Clinical consequences such as stress reactions, sleep disturbances, allostatic load, or autonomic dysregulation cannot be inferred automatically from the case trajectory. After concrete assessment, they may be relevant as possible consequence or burden effects, but they require independent clinical assessment, differential-diagnostic attention, and documentation of duration, intensity, and functional impact. The stress and allostasis-theoretical grounding can here be linked to McEwen, McEwen & Stellar, and Sapolsky (McEwen, 1998; McEwen & Stellar, 1993; Sapolsky, 2004).

Legal conclusions likewise require concrete legal assessment. Systemic disempowerment can point to legal-safeguards risks, but it does not itself determine whether a legal violation exists. The legal assessment must be based on relevant legal authority, case-file material, case trajectory, the authority's obligations, the citizen's correction opportunities, and possible legal effects.

2.5 Relationship to Institutional Distortion of Reality and Institutional Gaslighting

Systemic disempowerment is not identical with institutional distortion of reality or institutional gaslighting. Systemic disempowerment concerns the loss of effect. Institutional distortion of reality concerns a one-sided, inaccurate, or insufficiently reality-tested case picture. Institutional gaslighting concerns the intensified situation in which the distortion of reality is combined with power asymmetry, credibility undermining, and a weakened opportunity for reality correction.
Systemic disempowerment can therefore be a ground field for later distortion of reality, but the transition must never be assumed automatically. It must be examined concretely: Is the issue only a lack of effect, or has a fixed case narrative also arisen? Have the citizen's objections merely not been answered adequately, or have they been reinterpreted as signs of conflict-seeking, lack of ability or willingness to cooperate, or reduced capacity and functioning? Are disputed facts marked as disputed, or are they recirculated as fact?

This distinction is central to the white paper's conceptual hierarchy. Systemic disempowerment should be used as the first analytical step when examining ineffectiveness, rhythm breaks, weakened responsibility-bearing, fragmented responsibility, weakened organizational resonance, and weakened correction opportunity. Institutional gaslighting should only be examined if there are, in addition, documentable signs of narrative lock-in, credibility undermining, recirculation of uncertain or disputed information, and weakened reality correction.

2.6 Professional Grounding and Research

The concept of systemic disempowerment has been developed within Nature-Centered Human Development Theory and is illuminated through research on attachment, affect regulation, stress physiology, autonomic regulation, resonance, organism-environment interaction, activity theory, and institutional betrayal.
Developmental psychology, attachment theory, mentalization theory, and affect regulation theory point to the importance of timing, response, co-regulation, and emotional attunement (Bowlby, 1969/1982; Stern, 1985; Schore, 1994; Fonagy & Target, 1997; Trevarthen, 1979).

Stress physiology, chronobiology, allostasis, autonomic regulation, sleep, and interoception research points to the fact that prolonged uncertainty, unpredictability, and lack of response can function as burdening factors (Czeisler et al., 1999; McEwen, 1998; Sapolsky, 2004; Porges, 2011; Dana, 2018; Craig, 2002; Damasio, 1994).

Social and institutional theory, including resonance theory, power theory, and the literature on institutional betrayal, indicate that institutional fields can lose the ability to receive, process, and correct feedback (Rosa, 2019; Smith & Freyd, 2014; Foucault, 1977).

The organism-environment perspective and activity-theoretical contributions provide a theoretical bridge between bodily self-sense, action, the organism's action possibilities, and the meaning of the field. This bridge is central to NMU's understanding of structural incompatibility: strain arises not only in the organism and not only in the system, but in the coupling between the organism's rhythmic organization and the field's demands, rhythm, and response form (Damasio, 1994; Craig, 2002; Leontiev, 1978; Gibson, 1979; Maturana & Varela, 1980; Fuchs, 2018).

This literature supports the professional plausibility of the concept and its usefulness as an analytical concept. It does not, however, document systemic disempowerment in specific cases by itself. Concrete applications always require a timeline, case-file material, document analysis, assessment of correction opportunities, and possible clinical or legal professional assessment.

When the concept is used in cases involving children, the assessment should be anchored especially in the child's developmental needs, relational continuity, interactional timing, safety, possibility of participation, rhythmic integrity, and protection against prolonged uncertainty or procedural instability (Bowlby, 1969/1982; Stern, 1985; Schore, 1994; Fonagy & Target, 1997; Trevarthen, 1979; Brazelton & Greenspan, 2000).

When physiological or psychological consequences are described, they should be delimited to documentable burden indicators and source-anchored in allostatic load, autonomic dysregulation, interoception, and bodily trauma and survival responses (McEwen, 1998;

Sapolsky, 2004; Porges, 2011; Dana, 2018; Craig, 2002; Damasio, 1994; van der Kolk, 2014; Levine, 1997).

Taken together, this literature supports the view that prolonged rhythm breaks, weakened organizational resonance, fragmented responsibility, and ineffectiveness can cause or worsen physiological and psychological strain. Such a connection requires concrete documentation and clinical assessment.

2.7 Concept-Calibrated Minimum Test for Systemic disempowerment

For practical use, systemic disempowerment can be examined through the following minimum test. The test is an operationalization of NMU's canonical concepts and must not be used mechanically as an automatic conclusion.
Does a power or dependency relationship exist between the citizens and the system?

Is there structural incompatibility between the citizen's regulatory needs and the system's organization, rhythm, demands, or response form?

Has the citizen repeatedly attempted to create contact, clarification, help, follow-up, correction, or effect?

Have the system's responses, absence of responses, or case trajectory had limited or no real field-based or case-based effect?

Are there documentable rhythm breaks in time, contact, responsibility, coordination, follow-up, continuity, or record-keeping?

Is organizational resonance weakened, for example through lack of documented consideration of significant objections, information, or correction attempts?

Is responsibility-bearing weakened, or is responsibility fragmented so that no one carries the whole, the consequence, or the repair?

Have legal correction opportunities been formally weakened?

Is this a repeated and insufficiently repaired pattern, not merely isolated errors or ordinary waiting time?

Are there documentable signs of ineffectiveness, system-produced dysregulation, functional impact, strain, or legal-safeguards risk?

If several of these questions can be answered affirmatively based on a timeline and case-file material, the trajectory can, after concrete assessment, be analyzed as possible systemic disempowerment. If the questions cannot be documented, the concept should not be used as a conclusion, but at most as an investigative hypothesis.

Part III – Institutional Distortion of Reality and Institutional Gaslighting

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The main thesis of the white paper is that institutional gaslighting in public administration should be understood as a cumulative and documentable chain effect in which breaches of procedural guarantees, narrative lock-in, weakened access to correction, and psychological strain can reinforce one another. The document therefore uses the concept as an analytical and legal-safeguards tool – not as an independent legal category in Danish law and not as a clinical diagnosis.

The legal strength of the analysis depends on consistently distinguishing among three levels: ordinary administrative-law errors; human-rights-relevant interferences with private life, family life, fair procedure, data protection, and effective remedies; and the highest severity threshold, where prolonged, system-created psychological breakdown and the absence of effective remedies may bring Article 3 of the European Convention on Human Rights and Article 16 of the Convention against Torture into play.

The white paper also analyzes how cognitive and institutional biases can function as the psychological and organizational engine of institutional gaslighting, because bias can lock in an early negative case narrative, recode the citizen's reactions as personal inadequacy, and make the authority's own errors difficult to correct. [32]-[38]

As defined in the conceptual hierarchy, institutional gaslighting is understood here as a systemic distortion of reality in which a one-sided, inaccurate, or insufficiently reality-tested case narrative is produced, maintained, or recirculated while the citizen's opportunity for correction is weakened. The specific breaches of guarantee that can carry the mechanism are elaborated below.

This white paper expands the analysis with a systematic ICD-11 consequence analysis. Institutional gaslighting is not itself a diagnosis in ICD-11, and the white paper does not diagnose specific individuals. Rather, it describes the clinical consequences that, according to ICD-11's diagnostic structure, may in some cases be associated with prolonged, repeated, and power-asymmetric distortion of reality by authorities: acute stress reaction, adjustment disorder, PTSD, complex PTSD, prolonged grief disorder, anxiety- and fear-related disorders, depressive disorders, dissociative symptoms, bodily strain, sleep disturbances, suicide risk, harmful substance use, and social functional impairment. [7]-[11]

At the same time, Danish audit and ombudsman sources show that, in the social sector, structural conditions exist that make this kind of distortion of reality possible: extensive violations of law in municipal cases, high reversal rates, weakly documented oversight, hidden or late-recorded notes, and inadequate guidance to vulnerable citizens. These practices are clearly problematic under Danish administrative law and data protection law. Under human rights law, they may affect the right to fair procedure, private life, data protection, and effective remedies; and in the most serious, prolonged, and psychologically degrading cases, they may raise questions under the prohibition against degrading treatment and the investigation, complaint, and reparation provisions of the Convention against Torture. [12]-[23]

3.1 Method, Delimitation, and Evidentiary Status

The white paper works with four different levels of argument and documentation. First, documented systemic criticism from the Danish National Audit Office, the Public Accounts Committee, the Parliamentary Ombudsman, Justitia, and other oversight sources is used as a basis for identifying structural legal-safeguards problems. Second, the paper carries out a legal norm analysis of the guarantees meant to protect the citizen from decisions made on an inaccurate or one-sided basis. Third, psychological and clinical theory is used to describe possible harmful effects of prolonged, power-asymmetric distortion of reality. Fourth, Practice-based examples are used as qualitative illustrations of mechanisms, not as independent statistical documentation of prevalence. [12]-[16], [39]
This methodological delimitation is central to the white paper's legal usability. The document does not claim that every error in municipal case processing is institutional gaslighting. The concept becomes relevant only when several conditions appear together: power asymmetry, persistent narrative lock-in, insufficient verification, weakened contradiction, recirculation of disputed information, and documentable harmful effects or risk of harmful effect.

From an evidentiary perspective, analysis in specific cases should always be based on complete case files, metadata, version history, case notes, consultation traces, decisions, complaint files, access-to-file processes, and any medical or psychological documentation. Where information cannot be documented in the material, this should be expressly marked as a limitation and not filled in with assumptions.

3.2 The Concept and Its Theoretical Grounding

The concept of institutional gaslighting can be theoretically grounded and conceptually supported, even though it is not yet an established legal term in Danish legislation. Kate Abramson (2014) describes gaslighting as a deeply moral violation that seeks to destroy the very possibility of legitimate disagreement. Miranda Fricker (2007) provides the epistemic language needed to understand the harm: testimonial injustice arises when a person is downgraded as a known subject and burdened with an unreasonable credibility deficit. Paige Sweet (2019) shows that gaslighting is not only interpersonal manipulation but also operates through structural and institutional inequalities. Cynthia Stark (2019) connects manipulative gaslighting with psychological oppression. Jennifer Freyd and colleagues (Smith & Freyd, 2014) show that when a trusted institution acts or fails to act in ways that worsen harm and insecurity, this can be understood as institutional betrayal. Related research on DARVO (Harsey & Freyd, 2020, 2023) also shows that denial, attack, and reversal of victim and offender can systematically reduce the affected person's credibility in the eyes of others. [1]-[6]

It is essential to maintain a clear threshold for when the concept of institutional gaslighting is relevant. Ordinary slow or error-prone case processing does not in itself constitute gaslighting. The concept is used in situations where several cumulative conditions are met: a marked power and dependency relationship between authority and citizen; a persistent practice in which the citizen's experience, documentation, or objections are systematically made less credible; institutional production and recirculation of one-sided or inaccurate narratives across files and decisions; and a simultaneous weakening of the citizen's opportunities to correct or verify the information. Gaslighting differs from ordinary administrative errors in that administrative discretion, assessments, and decisions are continually made on a basis that is not objective and verifiable. Elements of poor case processing may resemble gaslighting, but gaslighting presupposes a pattern in which the authority does not genuinely seek to verify the citizen's objections, and in which the authority's own descriptions, notes, or assessments are recirculated as case facts. Only when errors, omissions, or practices collectively contribute to holding the citizen in an inaccurate, one-sided, or unverified narrative while effective correction is prevented does the concept become relevant.

Institutional gaslighting becomes especially relevant when the authority's discretion, assessments, and decisions do not rest on a sufficiently objective, current, and verifiable factual basis, and when the citizen's repeated objections do not lead to genuine investigation, correction, or clear marking of evidentiary uncertainty. The decisive issue is not whether the authority makes a single error, but whether the authority over time maintains a case narrative that is not sufficiently tested against documentation, party objections, timelines, journal traces, access-to-file processes, and other objective control points. In such cases, administrative errors can have a reality-distorting effect because the authority's own assessment is gradually treated as fact while the citizen's ability to correct the basis is weakened. [17]-[20]

In this context, it is important to emphasize power asymmetry. Institutional gaslighting is not a mutual conflict between citizens and authority. The citizen's stress, anger, or frustration is often a reaction to the authority's lack of documentation, insufficient correction opportunities, and maintenance of a one-sided narrative. The reaction should therefore not be confused with an equal cause of the conflict but understood as part of the harmful effect of gaslighting. The concept is also clearly delimited from ordinary slow, messy or error-prone case processing: only when power asymmetry, persistent narrative, lack of verification, and reality-distorting effect appear together can institutional gaslighting be at issue.

3.3 Institutional Gaslighting as a Chain Effect

The decisive feature of institutional gaslighting is that the harm rarely arises from a single error. It arises through a chain effect in which breaches of administrative-law guarantees take on narrative force. When significant information is not recorded, when the citizen is not heard as a party, when access to files arrives too late, or when disputed information is carried forward without being marked, the process of the case is not the only thing that changes. The case's reality basis changes as well. The authority's own version can thereby gradually move from assessment to administrative fact. It is in this transition from error to locked case narrative that the concept of gaslighting gains its analytical relevance.

3.3.1 The Institutional Gaslighting Chain

The institutional gaslighting chain can be described as a cumulative analytical model in which several legal-safeguards breaches, documentation errors, and narrative shifts can collectively have a reality-distorting effect:

1. The authority produces or receives burdening information.
2. The information is recorded inadequately, reproduced imprecisely, distorted, not sufficiently submitted for party consultation, disclosed too late, or otherwise handled in a manner that in practice weakens or obstructs the citizen's opportunity for insight, correction, and effective contradiction.
3. The information is then used, in whole or in part, as the basis for an assessment, recommendation, or decision.
4. The citizen's objections to the information or the case processing are not described as possible contradiction, but as conflict, lack of cooperation, lack of insight, or emotional instability.
5. A complaint, oversight, investigative, or judicial authority reproduces, carries forward, or legitimizes the authority's case narrative without sufficiently independent review of which information is documented, disputed, assessment-based, or undocumented.
6. The originally uncertain, incomplete, or contested basis is thereby recirculated as administrative truth, meaning a matter treated as fact in later stages of the case even though it was originally uncertain, incomplete, or disputed.
7. The citizen's psychological, social, or behavioral reaction to the process is subsequently used as further confirmation of the negative narrative, instead of also being assessed as a possible consequence of prolonged strain, powerlessness, lack of contradiction, or authority mishandling.

The model does not show that municipal errors in themselves constitute gaslighting. The argument is more precise: repeated and cumulative breaches of fundamental legal-safeguards guarantee can have a gaslighting and reality-distorting effect when they produce, protect, and recirculate a one-sided case narrative while weakening the citizen's effective access to information, party consultation, contradiction, reasons, and correction.
To be usable legally, the model should therefore not be understood as an independent diagnosis of the authority's intention, but as an interdisciplinary analysis of effect, structure, and documented process trajectory. The decisive assessment is not only whether the authority has committed a single error, but whether the errors together have created a process in which the citizen's documentation, objections, and description of reality systematically lose legal and institutional force while the authority's own narrative gains the status of fact without sufficient review.

3.4 Psychological Bias as a Driving Force in the Institutional Gaslighting Chain

Institutional gaslighting does not necessarily arise because one individual actor consciously wants to harm the citizen. It can also arise through a series of cognitive, professional, and institutional biases that, taken together, make the system less able to correct itself. In this context, bias does not function merely as an individual source of error, but as a mechanism that can stabilize a one-sided case narrative and protect the authority's earlier assessments from genuine review. [32]-[38]
A central mechanism is anchoring bias. When an authority early in a case trajectory establishes a burdening interpretation of the citizen – for example as conflict-driven, unstable, lacking insight, difficult to cooperate with, or risk-bearing – that first assessment may come to function as a negative anchor for all later case processing. Subsequent information is then assessed not neutrally but considering the already established narrative. The citizen's documentation, objections, and alternative explanations therefore risk being understood as deviations from the authority's basic story rather than as information that could correct the case. [32]

This mechanism is reinforced by confirmation bias. Once the authority's narrative has been established, later case processing will often seek, select, or assign the greatest weight to information that confirms the original assessment. Information pointing in the opposite direction may be toned down, overlooked, recorded late, or treated as less relevant. The gaslighting effect arises when the citizen experiences that documentation no longer functions as correction because the system has already decided which reality the case must be understood through. [33]

The fundamental attribution error is especially central. The citizen's stress, anger, exhaustion, desperation, or mistrust may be an understandable reaction to prolonged power asymmetry, lack of access to files, insufficient consultation of parties, unclear decision bases, or repeated rejection of correction. If the authority instead interprets the reaction as an expression of the citizen's personality, parenting capacity, cooperation ability, or psychological stability, attention is shifted away from the authority's burdening practice and onto the citizen's character. The reaction that the system itself has helped generate is thereby recoded as proof that the system's original assessment was correct. [34]

This recoding is one of the most serious mechanisms in institutional gaslighting. The citizen is pressed into a state of strain and is then met with that state of strain being used as documentation against the citizen. It creates a closed correction loop: the more the citizen tries to explain, document, or defend themselves, the easier it becomes to describe the citizen as conflictual, rigid, mistrustful, or lacking insight.

At the institutional level, this is reinforced by blind-spot bias and system justification. Blind-spot bias means that actors more easily see error, bias, and irrational behavior in the citizen than in the authority's own practice. System justification means that institutions tend to defend the status quo and uphold the notion that the system is fundamentally objective, lawful, and competent. When these mechanisms operate simultaneously, the authority may find it difficult to acknowledge that it may itself have produced or maintained an inaccurate narrative. [35], [36]

The sunk-cost fallacy can make the lock-in even stronger. The more meetings, notes, assessments, decisions, complaint responses, and internal resources have been invested in a particular narrative, the greater the institutional pressure to maintain it. Admitting error would not merely require correction of one piece of information; it could require reassessment of the entire case trajectory. The system can therefore acquire an interest in protecting the earlier narrative even when the original basis is weak, outdated, or disputed. [37]

Finally, allegiance bias can play a significant role when external professionals, consultants, psychologists, or other experts are brought in on a basis already shaped by the authority's narrative. If the assignment, case files, or institutional frame leads the external actor toward confirming the authority's understanding of the problem, the external assessment may come to legitimize the same narrative under the cover of professional neutrality. For the citizens, this can be experienced as a particularly serious form of reality distortion because an apparently independent expert now confirms the reality that the citizen has been trying all along to correct. [38]

Authority responsibility for external actors: Institutional gaslighting can also arise indirectly through private or external actors when they act according to the authority's assignment, instruction, selection of material, or problem formulation. This applies, for example, to psychologists, consultants, family therapists, observation services, or other experts whose assessments are later used as the basis for the authority's decision. The authority therefore cannot avoid responsibility for reality-distorting effects by placing central assessments with external actors if the assignment, files, or assessment framework are already marked by a one-sided or burdening narrative. [18], [38]

Taken together, the bias analysis shows that institutional gaslighting should not be understood only as a question of poor wording or isolated case-processing errors. It should be understood as a self-reinforcing mechanism in which cognitive and institutional biases can transform uncertain, disputed, or outdated information into administrative truth. Bias thereby becomes the psychological and organizational engine that enables a system to maintain a narrative even when the citizen presents documentation that should lead to correction.

3.5 Analytical Description of the Experienced Distortion of Reality

From the citizen's perspective, gaslighting can be experienced as a gradual weakening of the right to have one's description of reality tested objectively. Documents, timelines, witnesses, one's own notes, and concrete corrections can lose real significance if the authority's case narrative already functions as the frame within which all information is interpreted. When gaslighting becomes institutional in character, the harm is intensified because the distortion of reality is not carried by one actor alone, but by letters, case notes, decisions, complaint decisions, meetings, telephone notes, and internal assessments that mutually confirm one another. The citizen may thereby be placed inside a closed documentation structure, where correcting the case requires not only proof, but also a struggle to be recognized as a credible knowing subject.

Gaslighting typically presupposes that the reality-distorting practice serves a function in maintaining, protecting, or legitimizing a particular narrative. In an authority context, this function needs not be personal, explicit, or consciously formulated. It can be institutional, system-preserving, and objectively ascertainable, for example by protecting an earlier decision, avoiding reopening, limiting responsibility, maintaining the credibility of the department or management, minimizing criticism, or preventing earlier case-processing errors from having legal consequences.

3.6 Institutional Self-Interest as an Objective Function

In institutional gaslighting, self-interest should be understood as an objectively ascertainable function in the case trajectory. The function may consist of protecting an earlier decision, avoiding responsibility, avoiding reopening, preserving the department's credibility, protecting management, minimizing criticism, or preventing earlier case-processing errors from having legal consequences. The decisive question is not whether a particular employee subjectively wishes to harm the citizen, but whether the institution's overall practice

objectively holds the citizen in an inaccurate, one-sided, or unverified narrative while opportunities for correction are weakened.
In a legal assessment, self-interest should therefore not be treated as a requirement to prove malice on the part of a specific employee. It should be assessed as an objective function in the case trajectory: whether the practice protects an earlier narrative, reduces responsibility, limits reopening, or makes earlier errors difficult to correct. This understanding preserves the interest element of the gaslighting concept without making the analysis dependent on subjective intent to harm. [32]-[38]

Gaslighting operates in part by forcing the affected person over time to expend considerable energy documenting basic facts: what happened, when it happened, what was said, and why the official story is not accurate. This can create shame, confusion, anger, exhaustion, isolation, and doubt about one's own judgment. The seriousness is intensified if the affected person's strain reaction is later used as a new indicator that the person is difficult, unstable, or unreliable. [1]-[6]

3.7 The Documented Pattern in Municipal Administration

Danish practice contains strong indicators that this type of mechanism is not merely hypothetical. In 2026, the Danish National Audit Office found that municipalities' handling of child placement cases failed to comply with one or more legal requirements in 69 percent of the cases examined. For 57 percent of the children, the child welfare assessment was not prepared on time, and for 21 percent it was still missing six months after the placement decision, even though, as a starting point, it must exist before the decision. For 47 percent, the child's plan had not been prepared on time, and in several municipalities the share of cases with breaches of legal requirements ranged between 75 and 100 percent. The Public Accounts Committee also noted that the ministry had known of the persistent problems for at least 20 years. This points to a legal-safeguards pattern in which intrusive decisions are often made on a documentation basis that is deficient, delayed, or unlawful. [12]
The current relevance of the problem field is further strengthened by the fact that, on May 29, 2026, the Parliamentary Ombudsman announced that he was opening an investigation into municipalities' case handling in connection with the preparation of child welfare assessments in placement cases. The Ombudsman's initiative is based on the Danish National Audit Office's report of April 9, 2026, and underscores that the question of municipal documentation, timeliness, and lawful case processing in the placement area is currently subject to independent oversight. [39]

In 2025, the Danish National Audit Office also assessed that the Social Appeals Board's oversight of municipalities and regions in the social sector was unsatisfactory. The oversight was characterized by long case-processing times, inadequate documentation, and insufficient follow-up, which could allow unlawful practice to continue for a long time and thereby weaken citizens' legal safeguards. A particular legal-safeguards vulnerability arises if oversight primarily relies on authorities' own accounts and does not systematically stress-test those accounts against the citizen's documentation, metadata, complete files, and independent sources. [13]

The practice of the Parliamentary Ombudsman shows what the concrete mechanics can look like. In a municipal case from 2020, seven internal notes describing "cooperation difficulties" had not been sent when access to files was requested and had also not been properly included in the consultation of parties, even though they largely contained information about the factual basis of the case. The Ombudsman found it criticized that the municipality had not consulted the teacher about this information, and regrettable that the notes were neither recorded in time nor disclosed in response to the access-to-files request. This type of practice is central to any analysis of institutional gaslighting because it shows how internal descriptions can acquire legal effect before the affected party has a genuine opportunity to see, understand, and contest them. [14]

The access-to-files system itself is a particular problem field. The Danish Access to Public Administration Files Act requires that a request for access be decided as soon as possible and, as a starting point, within seven working days. If the matter has not been completed within 14 working days, the case-processing time can be separately appealed. The practical consequence of delayed access to files is often that the citizen receives access to the necessary correction material only after the decision has already been made, appeal deadlines are running, and the harmful effects have materialized. The problem is therefore not only the delay, but also the weak consequence regime surrounding the delay. [15]

Another pattern is document-technical and conceptual. Authorities risk setting aside the guarantees of the Danish Public Administration Act if they do not identify that a decision is in fact being made. When a decision establishes what is, or is to be, applicable law in a specific case, its content and legal effect – not the authority's label – are decisive. If decisions are reclassified as "assessments," "information," "status notes," or "procedural steps," a particular risk arises that complaint guidance, reasons, consultation of parties, and access to files are not activated in practice. [18]

Several public and professional sources point in the same direction. In 2024, Justitia described serious deficiencies in municipalities' guidance of vulnerable citizens and emphasized that complex and ineffective processes can prevent people from obtaining the help to which they are entitled. Reversal rates do not by themselves prove gaslighting. But they do document that large parts of municipal decision-making in the social sector do not withstand review, and that errors are not marginal exceptions. [16]

3.8 Hypothetical Case: When Several Authorities Participate in the Same Distortion of Reality

The following case is hypothetical and formulated in gender-neutral terms. It is not a description of a specific person, but an analytical model for how institutional gaslighting can arise across several authorities without any single actor necessarily needing to formulate an explicit plan.

A citizen, A, contacts the municipality to obtain help in a complex social case. A submits written documentation, a timeline, medical information, and objections to several claims in the municipality's preliminary material. The municipality, however, registers only parts of the material and writes in an internal note that A "has difficulty cooperating" and "has a conflict-oriented understanding of the case." The note is not sent to A for consultation as a party, but later forms background for an assessment.

At the next stage, the municipality prepares a decision in which A's objections are described as "undocumented," even though the documentation is in the case, but has not been recorded correctly. A requests access to the files but receives the material only after the decision. When A appeals, the municipality emphasizes to the complaints body that A "has repeatedly disputed the facts of the case without contributing constructively." A's attempt at correction is thereby transformed into evidence of a lack of cooperation ability.

The complaints body partly upholds the decision based on the municipality's account and reproduces several of the municipality's formulations without independently marking which information is disputed, which is documented, and which derives solely from the municipality's own assessments. A now experiences that another authority has given authority to the original story. When A attempts to have the information corrected, A is referred to the fact that the information has already been assessed in the complaint system.

An oversight authority later receives a complaint about the municipality's practice but primarily asks the municipality for an account. The municipality responds that there has been "extensive dialogue" and that A "has had the opportunity to submit comments." The oversight authority does not fully examine whether access to files arrived too late, whether significant notes were submitted for party consultation, or whether A's documentation was recorded and considered. The oversight authority closes the case without action or with a very general statement.

In parallel, A is met in another branch of authority, for example a benefits, family, health, or employment system, where the earlier formulations are reused as background information. A's new explanation is now assessed through the old files. The original uncertain claim thereby becomes administrative "truth" because several authorities have repeated it. A's increasing stress, anger, sleeplessness, and exhaustion are then described as signs of A's personal problem rather than as possible consequences of the case trajectory.

The gaslighting mechanism in the case consists not only of one inaccurate sentence. It consists of the chain: selective record-keeping, lack of party consultation, delayed access to files, reuse of burdening formulations, insufficient reality-testing, authorities' mutual legitimization, and pathologization of the citizen's reaction. The decisive legal safeguards harm is that A loses access to effectively correct the reality on which the authorities subsequently make decisions.

3.9 Methodological Note on Practice-based examples

The following examples are based on practice experience from attorneys, advisers, and party representatives with experience from concrete cases in the child, family, and social sectors. The examples are reproduced in anonymized and generalized forms and used as analytical examples of recurring patterns. They should not be understood as statistically representative documentation, but as practice-based experience material that illuminates how institutional gaslighting can arise in concrete case trajectories.
The Practice-based examples are not used as independent statistical proof of the prevalence of institutional gaslighting. They are used as qualitative indicators of recurring mechanisms that can be compared with the documented systemic problems from the Danish National Audit Office, the Parliamentary Ombudsman, Justitia, and the Social Appeals Board's reversal practice. Their value lies in pattern recognition: They show how breaches of legal guarantees in concrete case trajectories can have reality-distorting effects for the citizen. [12]-[16], [39]

To satisfy legal and analytical standards, each practice example should therefore be read through three fixed questions: 1. What type of legal problem is illustrated? 2. What gaslighting mechanism can the problem trigger? 3. What concrete documentation is required in a real case to substantiate the mechanism?

Each practice example should also be read through a fourth question: What documentation must exist to show that the mechanism has operated in the case? At a minimum, one should consider whether there are decisions, party consultation materials, access-to-file correspondence, case notes, internal assessments, expert assignments, metadata, version history, action plans, contact descriptions, complaint responses, and possible medical or psychological documentation of consequences. [14], [15], [17]-[20]

The practice experiences are reproduced with permission from Attorney Gert Dyrn, Attorney admitted before the High Courts, Stage Advokater, and assistant attorney Glenn Dyrholm, Master of Laws and Master of Education, Stage Advokater. The information is based on their practice experience from cases concerning public administration, legal safeguards, and citizens' encounters with the authority system.

The following Practice-based examples should therefore not only be read as examples of breaches of legal guarantees. They should also be read as examples of how bias can have concrete effect in case processing. Older information can be held in place through anchoring bias. Suspicion can be carried forward through confirmation bias. The citizen's reactions can be reinterpreted through the fundamental attribution error. Vague action-plan goals can maintain a negative narrative through self-confirming assessment criteria. And external professional assessments can, if the assignment is framed in a skewed way, function as professional legitimization of the authority's already established story.

3.10 Transition to Practice-based examples

The following Practice-based examples should be read as analytical pattern examples. They show how institutional distortion of reality can arise when procedural guarantees, case investigation, access to files, consultation of parties, assignments to experts, action-plan goals, or observations do not function as genuine correction mechanisms.
The examples are not in themselves proof of institutional gaslighting in concrete cases. They show which kinds of documents, timelines, and decision stages should be examined when assessing whether a case trajectory has moved from ordinary error or disagreement into a pattern of narrative lock-in, weakened contradiction, and reality-distorting effect.

They are generalized pattern examples. They must therefore not be read as documented individual cases unless, in a specific application, separate consent, source identification, and the complete case-file basis are available.

3.11 Practice-based examples

3.11.1 Example 1: One-Sided Case Investigation and Use of Diagnoses or Old Information

In a forced placement case, a municipality based its assessment of the mother's parenting capacity to a decisive extent on older psychiatric diagnoses and information from 2005. No current competence assessment was carried out that concretely specified the connection between the diagnoses and present-day caregiving capacity, which made the assessment appear arbitrary. In other cases, generalized descriptions and the inclusion of outdated information such as previous substance abuse, alcoholism, or criminality are seen as the basis for a narrative of current instability and weakened morality without an individualized assessment of the connection.
Relevance to institutional gaslighting: The example shows how historical or general information can be given present-day explanatory force without concrete verification. When diagnoses, prior substance abuse, criminality, or other burdening information are used as the basis for a narrative of current parental unfitness without an individual and current assessment of the connection, the citizen may be held in an administrative reality that the citizen cannot genuinely correct.

The administrative-law core is lack of current relevance and lack of concrete assessment of connection. The gaslighting mechanism is that historical information is used to hold the citizen in a present-day negative identity from which the citizen cannot genuinely free themselves. The possible harmful effect is loss of credibility, a sense of being locked in, and psychological strain from constantly having to disprove a past that is no longer documented as relevant.

Documentation requirements in a concrete case: It should be documented which older diagnoses, previous incidents, or historical information have been used, whether a current competence or functional assessment exists, and whether the authority has concretely reasoned the link between historical information and present-day caregiving capacity. At the same time, it should be examined whether the citizen's more recent documentation, treatment, functional development, or changed life situation has been recorded, submitted for party consultation, and given real weight. [17], [18], [19]

3.11.2 Example 2: Maintaining a Presumption of Violence After a Police Case Has Been Closed

In cases involving a presumption of violence against children based on reports of concern, the suspicion may be carried forward administratively even after a police case has been closed as unfounded. The presumption of violence is often maintained with the same force without any new independent reasoning, and the administration may be unable to justify its presumption beyond the matters the police have already investigated. Subsequent parenting-capacity assessments are thereby set aside, and in practice the parents have no opportunity to clear their names.
Relevance to institutional gaslighting: The example shows how a suspicion can be carried forward administratively even after the criminal-law track no longer supports the suspicion. If the same factual presumption continues to be used with the same force without new independent reasoning, a closed correction situation is created in which the citizen in practice cannot be cleared. The absence of proof thereby has no real corrective effect.

The administrative law core is the lack of independent reasoning for continued administrative suspicion. The gaslighting mechanism is that the absence of a criminal-law basis has no corrective effect, while the suspicion is nevertheless recirculated as administrative reality. The possible harmful effect is a sense of lawlessness because the citizen has access to no genuine clearing mechanism.

Documentation requirements in a concrete case: It should be clear what independent administrative basis the authority relies on after the police have closed the case, how evidentiary status is marked, and whether the citizen has had a real opportunity to have the suspicion corrected or disproven in the social system. A clear distinction should be made between criminal-law evidentiary assessment and social-law risk assessment, but it should also be documented whether the continuing suspicion rests on new, current, and concretely reasoned information. [17], [18], [21]

Clarification: A social-law authority is not necessarily bound by the police's criminal-law evidentiary assessment. The authority may have a duty to make an independent child-welfare risk assessment. The legal problem arises if the same suspicion is carried forward with the same weight without a new, current, and concrete administrative basis, without clear marking of evidentiary status, and without a genuine opportunity for the citizen to have the suspicion corrected or disproved in the social system.

3.11.3 Example 3: Deficit-Focused Assignments for Psychological Assessments

In an assignment for a psychological description, the municipality formulated the purpose of the examination as substantiating that the parents would be permanently unable to care for the child. This formulation bears the mark of a predetermined statement of intent and focuses on the parents' deficits, which limits a holistic assessment and risks becoming a self-fulfilling prophecy. A more resource-oriented formulation – such as examining whether the child's health and development can be secured at home through less intrusive measures and support – would have recognized the parents' development possibilities and would not have defined the outcome in advance.
Relevance to institutional gaslighting: The example shows how the investigative frame itself can steer professional assessment toward a particular result. When the assignment is formulated as fault-finding rather than holistic assessment, the authority risks producing a self-confirming story in which the parents' resources, development possibilities, and alternative support needs are made invisible.

The administrative-law core is the risk of irrelevant or biased case investigation. The gaslighting mechanism is that the examination is designed so that it confirms the authority's existing narrative instead of testing it. The possible harmful effect is that the citizen's resources and development possibilities are made invisible while deficits are magnified.

Documentation requirements in a concrete case: It should be documented how the assignment to the expert was formulated, which files the expert received, whether the assignment requests both burdens, resources, support needs, and development possibilities, and whether alternative less intrusive solutions were examined. If the assignment primarily searches for deficits or permanent inadequacy, this should be marked as a possible correction point in the case investigation. [18], [38]

3.11.4 Example 4: Failure to Provide Guidance on Consent to Voluntary Placement

In voluntary placement cases, authorities often fail to explain that a later request for the child to return home triggers a return-home period of up to six months. Parents therefore give consent in the belief that the child can come home more quickly than in a forced

placement, even though the reality is a longer-term placement. When consent is withdrawn, contact is typically reduced with reference to further examinations and the child's need for stability. The lack of guidance undermines trust in the authority.
Relevance to institutional gaslighting: The example shows how the citizen can be led to act based on an inadequate or wrong understanding of the legal effects. If the citizen's later reaction to the unforeseen consequences is then used as a sign of lack of cooperation, instability, or lack of child perspective, attention shifts from the authority's guidance failure to the citizen's reaction.

The administrative law core is missing or insufficient guidance on the legal effects of consent. The gaslighting mechanism is that the authority's failure to guide is subsequently shifted onto the citizen's lack of cooperation or lack of understanding. The possible harmful effect is loss of trust, a sense of manipulation, and a strong feeling of having been led into a decision on the wrong basis.

Documentation requirements in a concrete case: It should be documented what guidance the citizen received before consenting to voluntary placement, whether the legal effects of a later request for return home were explained, whether any changes in contact after withdrawal of consent were concretely reasoned, and whether the citizen's reaction was described as cooperation difficulty without simultaneous assessment of the failure to provide guidance. [17], [18]

3.11.5 Example 5: Vague and Subjective Goals in Parental Action Plans

Action plans for parents often contain vague, qualitative goals such as becoming more patient, strengthening mentalization capacity, or reducing conflicts with the administration. The goals cannot be met independently of other people's subjective assessments and lack qualifiable measurement points. At the same time, the administration sets up ideal-typical patterns of behavior that would disqualify most parents, and ordinary deviations such as an angry outburst are interpreted as general problems. When requirements cannot be met or objectively documented, the action plan becomes a tool for holding the parents in the role of inadequate people.
Relevance to institutional gaslighting: The example shows how the citizen can be subjected to requirements that cannot be met or documented according to objective criteria. When fulfillment depends on the authority's or opposing party's subjective assessment, the citizen can be held in a state where any attempt to meet the requirements can be rejected and used to confirm the negative narrative.

The administrative law's core is lack of objectifiability and lack of opportunity to document fulfillment of the requirements. The gaslighting mechanism is that unclear and subjective goals make the authority's assessment self-confirming. The possible harmful effect is that the citizen is held in a permanent position of inadequacy in which even improvement can be dismissed.

Documentation requirements in a concrete case: It should be documented whether the goals of the action plan are concrete, measurable, realistic, and time-limited, and whether the parent has received support to meet them. It should also be examined who assesses fulfillment, which objective criteria are used, and whether non-fulfillment is in fact due to unclear goals, subjective assessments, or lack of support measures. [17], [18]

3.11.6 Example 6: Brief and Artificial Contact Observations

Assessments of parenting capacity are often based on brief and artificial contact observations carried out under pedagogical “best practice” standards without considering that the interaction is shaped by crisis, monitoring, and long periods between contact. Reactions that may be natural consequences of the situation – such as the wish to preserve a good atmosphere or avoid conflict – are reinterpreted as lack of boundary-setting or as personal traits. The context that creates the reactions disappears, and the parent is described as problematic.
Relevance to institutional gaslighting: The example shows how reactions that may be natural consequences of crisis, separation, monitoring, and long periods between contact can be reinterpreted as general personal deficits. When context-dependent reactions are described as stable traits of the parent, attention is shifted away from the system’s intrusive frame and onto the citizen’s personality.

The administrative-law core is that context-dependent observations cannot automatically be generalized into stable traits without a proportional, current, and concrete assessment. The gaslighting mechanism is that reactions created by the system’s frame are reinterpreted as personal inadequacy. The possible harmful effect is that the citizen experiences being trapped in a test situation where the artificial frame itself triggers the reactions then used against the citizen.

Documentation requirements in a concrete case: It should be documented how many contact sessions were observed, how long they lasted, who observed them, which methodological reservations were made, and how crisis, monitoring, prolonged separation, the child’s loyalty conflict, and artificial frames were considered. It should also be examined whether the observations were used as context-bound snapshots or as general conclusions about parenting capacity. [17], [18]

3.12 From Practice Pattern to Legal Assessment

The practice patterns described are not problematic merely because they may be experienced as violating. They are legally problematic because they strike at the procedural guarantees that must prevent the state from making intrusive decisions on a wrong or one-sided basis. Institutional gaslighting therefore becomes legally relevant where the authority's document handling, case investigation, party consultation, access to files, reasoning, and complaint handling collectively weaken the citizen's access to correcting the information the state uses against the citizen.

For the Practice-based examples to be used in concrete legal cases, documentation should be divided according to evidentiary function: decision basis, information, assessment, professional statement, the party's objection, the authority's position on the objection, and subsequent recirculation in new decisions or notes. This division makes it possible to show whether the matter is truly error, disagreement, discretion, inadequate case investigation, or narrative lock-in with a correction-inhibiting effect.

The Practice-based examples function as a methodological analytical tool. They show which documents and information are relevant to examine, which stages of the authority's reasoning should be tested, and how it can be assessed whether a piece of information has been repeated, reinforced, or used as fact without sufficient documentation. The aim is to be able to describe a possible reality-distorting effect in a sober and evidentially responsible way, where the conclusion follows from the documented case trajectory. [14], [17]-[20]

3.13 The Legal Assessment

3.13.1 Danish Law

The Danish legal analysis should be expressly anchored in the procedural guarantees that protect the citizen from inaccurate or one-sided authority narratives. This includes, in particular, the official principle, sections 1, 3, and 10 of the Legal Safeguards Act, sections 9 b, 19, 21, and 22-25 of the Public Administration Act, sections 13, 15, and 36 of the Access to Public Administration Files Act, and Article 5(1)(d) and Article 16 of the General Data Protection Regulation. These provisions have different functions, but they point in the same direction: the authority must investigate the case correctly, give the party access to know and correct burdening information, give reasons for the decision, and ensure that inaccurate personal data is rectified. [15], [17]-[20]

If the breaches of guarantee described occur together in a concrete case, the practice may, depending on the circumstances, be legally problematic at several levels at once. The purpose of the Legal Safeguards Act is to secure citizens' rights and influence, and the municipality must handle applications and questions about help in relation to all relevant possibilities under social legislation. In addition, the authority itself is responsible for ensuring that the case is sufficiently investigated before a decision is made. The official principle is a fundamental principle of administrative law: an authority may not decide on insufficient material. If a municipality maintains a one-sided or directly incorrect case narrative without actively investigating and qualifying the facts, it is therefore not merely a communication problem, but a breach of the duty to investigate itself. [17]

The Public Administration Act can make the legal problems even clearer when the breaches of guarantee are concretely documented. Under section 19, no decision may be made before the party has been made aware of significant unfavorable information about the factual basis of the case or external professional assessments and has been given the opportunity to comment. Under section 9 b, the decision must be postponed if a party, during the processing of the case, requests access to files that must be granted. Under section 21, the party may demand that the decision be postponed until the party has submitted a statement. The requirements of reasoning and complaint guidance supplement these guarantees. If the municipality produces or uses burdening documents without real contradiction and without full access to the material, several guaranteed rules are violated at once. [18]

The access-to-files and data protection rules are also affected. The Access to Public Administration Files Act requires swift processing and gives separate appeal access for lengthy processing time. Data protection law requires that inaccurate personal data be corrected and that incomplete information can be supplemented. When inaccurate or strongly disputed information remains as operative case facts, and when corrective material is only disclosed after the decision, the issue is therefore not only an administrative-law error, but also a data-protection-law problem. [15], [19], [20]

Relabeling does not change this. The legal character of a statement depends on whether it establishes what is, or is to be, applicable law in a specific case. If the authority labels a decision as something else and thereby omits complaint guidance, adequate reasoning, or party rights, the matter remains legally problematic. It is especially aggravating if subsequent review also relies on this reclassification.

3.13.2 Human Rights and International Law

In the international analysis, a sharp distinction should be made between Article 1 and Article 16 of the Convention against Torture. Article 1 concerns torture proper and presupposes, among other things, severe pain or suffering, a relevant purpose, and public authority involvement. Article 16 concerns other cruel, inhuman, or degrading treatment or punishment and is the most relevant framework for serious municipal trajectories where prolonged state-created psychological breakdown, humiliation, helplessness, and destruction of effective correction access are alleged. The white paper's main argument should therefore primarily be placed under Article 3 of the European Convention on Human Rights and Article 16 of the Convention against Torture, while torture proper under Article 1 should be reserved for extraordinary cases involving intensity, purpose, and documented psychological or physical suffering.

Under human rights law, the practice affects at least three core guarantees. First, Article 6 of the European Convention on Human Rights protects the right to a fair and public hearing within a reasonable time in the determination of civil rights and obligations. Second, Article 8 protects private life, family life, and personal-data-related interests; the European Court of Human Rights has emphasized in its case law and guides that administrative procedures and the storage of personal data can fall within Article 8. Third, Article 13 requires an effective national remedy. When a municipality stores and carries forward disputed information, makes welfare decisions on that basis, and the citizen only receives effective insight or review late or not at all, all three provisions are relevant. [21]-[23]

In the area of EU law, the analysis is twofold. Article 41 of the EU Charter expresses the principle of good administration and includes the right to be heard and the right to access one's own file, but the provision is directly addressed to the institutions of the Union. Where municipal cases implement or affect EU rights – especially data protection rights – Article 47 on effective remedies and Article 8 on data protection are operative. The rules of the General Data Protection Regulation on accuracy and rectification require that inaccurate or incomplete information be corrected or supplemented without undue delay. [19], [20], [24]

The broader international framework is also clear. Article 14 of the ICCPR protects fair hearing in disputes over rights and obligations. Article 13 of the Convention on the Rights of Persons with Disabilities requires effective access to justice, including in the investigative and preparatory stages, while Articles 15 and 17 protect against cruel, inhuman, or degrading treatment and against violations of physical and mental integrity. Articles 12 of the Convention against Torture requires a prompt and impartial investigation where there is reasonable ground to believe that torture has occurred; Article 13 requires access to complaint and impartial review; Article 14 requires redress; and Article 16 obligates the state to prevent other cruel, inhuman, or degrading treatment. Not every unlawful municipal case reaches this threshold. But where there are prolonged, systemic, state-created psychological breakdowns, massive power asymmetry, humiliation, helplessness, and consistent destruction of the affected person's credibility, a serious human rights argument arises that Article 16 and Article 3 may be engaged, and that the state therefore owes an independent, prompt, and protected investigation. [25]-[27]

3.13.3 The Human Rights Threshold Question

The human rights threshold question is central. The white paper does not claim that every unlawful municipal decision, every deficient party consultation, or every delayed access-to-files process constitutes degrading treatment. The question arises only where a cumulative burden of significant seriousness exists long duration, massive power asymmetry, repeated rejection of correction, serious interferences with family life, health, subsistence, or social identity, documentable psychological harmful effects, and absence of effective national

remedies. It is in this cumulative assessment that Article 3 of the European Convention on Human Rights and Article 16 of the Convention against Torture may become relevant.
The threshold assessment should be cumulative and documentation based. The factors should include duration, intensity, the authority's knowledge or constructive knowledge, the degree of dependency, the significance of the interference for family life, health, subsistence, or identity, the presence of psychological harmful effects, access to effective remedies, and whether the state responded promptly, independently, and protectively to credible complaints.

3.14 From Distortion of Reality to Clinical Strain

The psychological harm of institutional gaslighting does not arise only from the citizen meeting resistance. It arises when the citizen is deprived over time of normal access to reality correction. When documentation has no effect, when objections are reinterpreted as conflict-generating behavior, when access to files comes too late, and when complaints bodies carry forward the authority's narrative without independent reality-testing, the citizen may be placed in a persistent state of strain. The ICD-11 analysis should therefore be read as an analysis of possible consequences of prolonged, power-asymmetric, institutionally maintained stress – not as a claim that every instance of unlawful case processing leads to mental disorder.

3.15 ICD-11 Consequence Analysis: Psychological, Social, and Physical Consequences

3.15.1 Methodological Delimitation

ICD-11 must be used clinically by qualified professionals and always requires concrete assessment of symptoms, duration, functional impairment, differential diagnosis, and alternative explanations. Institutional gaslighting is therefore not an independent ICD-11 diagnosis. The purpose of the white paper is to show which ICD-11 categories may professionally become relevant as possible consequences, comorbidities, or differential diagnoses when a person over a longer period is exposed to power-asymmetric, systemic distortion of reality by institutions on which the person depends. WHO's 2024 CDDR clarifies that ICD-11's clinical descriptions are intended to support precise and reliable identification of mental, behavioral, and neurodevelopmental disorders in clinical contexts. [7], [8]
The core of the assessment is not whether the authority's behavior "feels violated, but whether the overall strain is assessed in relation to, and described as possibly related to, clinically significant symptoms and functional impairment. Documentation should therefore include the timeline, decisions, access-to-file process, deficits in party consultation, case notes, medical information, psychological descriptions, changes in work ability, sleep, relationships, finances, social participation, and possible crisis reactions. Symptom development is, however, normally multifactorial, and institutional burdens may function as

contributing, triggering, or maintaining stressors in interaction with premorbid burden, earlier trauma, genetic/biological vulnerability, personality traits, coping, resilience, and social context.

3.15.2 Stress-Related Disorders Under ICD-11

The most directly relevant ICD-11 categories are found under “disorders specifically associated with stress.” WHO describes this group as disorders directly related to exposure to a stressful or traumatic event, a series of such events, or other burdening experiences. An identifiable stressor is necessary, but not sufficient; there must also be a characteristic pattern of symptoms and functioning. [9]

• QE84 Acute stress reaction: ICD-11 places acute stress reaction among factors influencing health status or contact with health services, not as a mental disorder. It may be relevant in the first phase after a burdening authority event, for example acute shock after a decision, sudden removal of support, threat of intervention, or discovery of hidden burdening notes. [9]

• 6B43 Adjustment disorder: relevant when the affected person develops persistent preoccupation with the stressor or its consequences, rumination, worry, sleep disturbances, demoralization, and functional impairment after the authority process. ICD-11 emphasizes that the stressor may be of any severity and does not necessarily have to be extremely threatening or horrific. This makes adjustment disorder a central category in cases where the burden is prolonged administrative uncertainty, financial insecurity, social humiliation, or repeated procedural breaches. [10]

• 6B40 PTSD: relevant when the affected person has been exposed to an extremely threatening or horrific event or series of events and develops re-experiencing in the present, avoidance, and persistent sense of current threat. In institutional cases, the assessment may become especially relevant in connection with interferences in family life, coercion-like situations, loss of housing or subsistence, or other events experienced as existential threat. [9], [10]

• 6B41 Complex PTSD: relevant in prolonged or repeated burdens where escape is experienced as difficult or impossible, and where PTSD symptoms are accompanied by serious problems with affect regulation, persistent negative self-concept, and persistent difficulties in relationships. Institutional gaslighting can affect these domains by contributing to chronic alarm readiness, undermining trust in one’s own judgment, and for some people making it more difficult to trust family, networks, professionals, and public systems. Development of complex PTSD requires that the criteria for PTSD are still met and that the burden is both prolonged and serious; not all people in institutional trajectories develop this condition. [9], [10]

• 6B42 Prolonged grief disorder: relevant if the authority trajectory is connected with a death and the subsequent grief reaction meets the ICD-11 criteria. For other forms of loss – for

example loss of daily contact with a child, loss of home, work life, health, identity, or social role – the analysis should as a starting point use terms such as grief-like strain, adjustment disorder, depressive reaction, or complex traumatization in individual persons. [11]
In cases involving loss of daily contact with a child, loss of home, work life, health, or social identity, the white paper should generally use terms such as grief-like strain, adjustment disorder, depressive reaction, or complex traumatization unless a death has occurred and the specific ICD-11 criteria for prolonged grief disorder are met.
• 6B4Y/6B4Z Other specified or unspecified stress-related disorder: relevant as a residual category if the symptom picture is clearly stressor-related and causes significant burden or functional impairment, but does not fully meet the requirements for the other stress-related disorders. [9]

3.15.3 Anxiety-, Fear-, and Compulsion-Related Consequences

• 6B00 Generalized anxiety disorder: may be relevant in persistent generalized worry, catastrophic thinking, bodily tension, concentration difficulties, and sleep problems, especially where the authority trajectory has taught the affected person that new letters, meetings, or decisions can unpredictably change the conditions of life. [7], [10]
• 6B01 Panic disorder and MB23.H "with panic attacks": panic attacks can arise as reactions to letters, phone calls, meeting notices, digital mail notifications, or reactivation of earlier case experiences. ICD-11 also uses a panic attack specifier in other disorders when panic attacks occur in their context. [10]
• 6B02 Agoraphobia, 6B03 Specific phobia, and 6B04 Social anxiety disorder: may be relevant if the affected person begins to avoid particular places, meetings, public offices, digital platforms, professional relationships, or social situations because they are associated with humiliation, loss of control, or risk of misinterpretation.
• 6B20 Obsessive-compulsive disorder or obsessive-compulsive-related symptoms: may be relevant differentially if the affected person develops compulsive checking of documents, repeated reading of case files, or ritualized securing of evidence. In institutional cases, however, one must distinguish pathological compulsion from rational documentation behavior in a system where earlier documentation has in fact been ignored.

3.15.4 Depressive and Self-Harming Consequences

• 6A70 Single episode depressive disorder and 6A71 Recurrent depressive disorder: may be relevant in persistent low mood, loss of interest, hopelessness, guilt, worthlessness, exhaustion, changes in sleep and appetite, concentration difficulties, and suicidal thoughts. Institutional burdens can contribute to depressive symptoms in some people, especially when experiences of helplessness, social isolation, financial pressure, and repeated rejection of correction interact with other risk factors. [7]

• Suicide risk and self-harm are not merely symptoms, but clinical alarm signals. If a person describes being psychologically broken down by an authority trajectory, the authority or complaints body should not use this to disqualify credibility. It should trigger a protective, trauma-informed, and acute risk assessment.
• Demoralization, hopelessness, and learned helplessness can in practice be central expressions of harm even when they do not in themselves constitute a separate ICD-11 diagnosis. They are legally relevant because they can document functional impairment and harmful effect.

3.15.5 Dissociative and Bodily Consequences

• 6B61 Dissociative amnesia: may be relevant if traumatic or extremely stressful trajectories are accompanied by significant gaps in autobiographical memory that cannot be explained by ordinary forgetfulness, substance influence, or neurological disease. ICD-11 describes a connection with stress, conflicts, and traumatization. [11]
• 6B66 Depersonalization-derealization disorder: may be relevant when the affected person experiences being detached from themselves, their body, their emotions, or their surroundings, or experiences the world as unreal. For some people, depersonalization/derealization may be experienced as a stress reaction when one's own experiences and institutional descriptions feel incompatible. [11]
• 6B60 Dissociative neurological symptom disorder: may be differentially relevant in neurological-like symptoms such as paralysis, tremors, gait disturbance, non-epileptic seizures, vision problems, or speech problems that are not consistent with known neurological disease and occur in connection with strain. It always requires thorough somatic and neurological investigation. [11]
• 6C20 Bodily distress disorder: may be relevant when prolonged stress manifests as pain, fatigue, gastrointestinal symptoms, breathing symptoms, headache, or persistent concern about bodily symptoms with significant functional impairment. ICD-11 describes bodily distress disorder as often coexisting with depressive and anxiety-related disorders. [11]

3.15.6 Sleep, Substance Use, Eating, Functioning, and Social Consequences

• Sleep-wake disorders can be a central consequence even when they are not the main diagnosis. Sleep problems increase the risk of irritability, concentration failure, pain sensitivity, emotion-regulation problems, and errors in one's own case handling.
• Disorders due to substance use or addictive behaviors may become relevant if the person uses alcohol, cannabis, sedatives, stimulants, gambling, or other strategies to dampen alarm readiness, sleeplessness, or shame. This does not change the fact that the original burden must still be examined; substance use must not automatically be used to reject the affected person's credibility.

• Feeding or eating disorders and altered eating behavior can arise as regulation strategies under extreme stress. In authority cases, weight loss, overeating, nausea, loss of appetite, or control-focused eating may be clinically relevant functional markers.
• Social withdrawal, loss of work ability, loss of trust in the health care system and authorities, conflicts in family and network, and avoidance of help are not secondary details. They are central indicators of whether the burden has developed into significant functional impairment.
• Somatic stress consequences should be documented. WHO describes that chronic stress can be associated with concentration difficulties, headache, bodily pain, stomach problems, and sleep disturbances. Research on allostatic load describes how persistent stress creates accumulated wear on the brain and body. [28], [29]

3.16 Special Harm Mechanisms in Institutional Gaslighting

Institutional gaslighting differs from ordinary stress by being able to undermine the affected person's access to social confirmation of reality. The harm may therefore include the experience of not having what actually happened recognized. In some people, this mechanism can intensify trauma symptoms because protective factors are lost, such as fair treatment, credible documentation, social support, opportunity for correction, and predictability.
Research on institutional betrayal – often survey-based and retrospective – indicates that harm from an institution on which the affected person depends can worsen trauma burden. When institutions that were supposed to protect, help, or investigate instead deny, delay, distort, or carry forward a burdening narrative, the harm in serious cases can become more extensive than the original event alone. [5], [6]

Psychological consequences should therefore not be assessed in isolation from the case files. A clinical assessment should compare the development of symptoms with concrete authority events: decisions, delays in access to files, refused corrections, new burdening notes, complaint decisions, oversight closures, financial sanctions, contact or family-life interventions, loss of benefits, and other objectively documentable burden points.

3.17 Restoring Legal Safeguards

The most suitable legal-safeguards response is an independent investigation into human rights weight. If credible allegations exist of prolonged, state-created psychological breakdown, distortion of reality, reprisals against citizens seeking correction, and systematically carrying forward of inaccurate information, the investigation should be designed to meet the standards in Articles 12-14 and 16 of the Convention against Torture. It should be prompt, impartial, and institutionally independent of municipalities, ministries, and the Social Appeals Board; protect complainants and witnesses against reprisals; have

access to complete case files, metadata, version histories, and log traces; work trauma-informed; and be methodologically grounded in the principles behind the Istanbul Protocol. It should also be able to recommend individual redress, systemic reform, referral to other oversight bodies, and possible compensation or reopening of cases where document distortion or serious procedural breaches can be shown. [25], [30]
A reform program should at minimum include the following system changes:

The reform proposals below should be understood as direct countermeasures to the mechanisms that make institutional gaslighting possible. Each reform targets a specific link in the chain: hidden or delayed documentation, lack of contradiction, recirculation of disputed information, weak complaint review, lack of data rectification, and pathologization of the citizen's reaction.

• Automatic process stop when party access to files or party consultation has not been completed. If significant burdening material has not been fully disclosed and given a reasonable deadline for contradiction, no decision may be made.
• Mandatory contradiction trace in the file. Every disputed factual claim must be marked as disputed, and the citizen's response must be shown side by side with the authority's claim in all later stages of the case.
• Duty of truth with verification requirement. Municipal statements given weight in complaint or oversight processes may not stand alone if they are disputed and can be document-tested.
• Immutable journal and document traces. Final documents must have locked dates, version history, and audit trails so changes can be traced, and post-dating or technical shifting of document status is prevented.
• Real sanctions for delayed access to files and repeated breaches of guarantees. Not only criticism, but procedural consequences: suspended appeal deadlines, duty to reopen in cases of significant delays, oversight reactions, and management responsibility for repeated unlawful practice.
• Independent reality testing in the complaint system. The complaints body must explicitly state which information it considers proven, which claims are disputed, and what documentation it relies on.
• Right to qualified assistance. Citizens in complex social cases should have access to free or heavily subsidized lay representative or attorney assistance, especially where health information, doubtful risk assessments, or major subsistence interventions are at stake.
• Data protection redress. When inaccurate information has been used or disclosed, correction or a supplementary statement must be inserted close to the original information, and relevant recipients must be notified.

• Trauma-informed complaint handling. Authorities must not use the affected person's stress reaction as evidence of unreliability without examining whether the reaction may be a consequence of the authority trajectory.
• ICD-11-based harm screening in serious cases. In documented prolonged distortion of reality, stress-related, depressive, anxiety-related, dissociative, and bodily consequences should be systematically examined, but without pathologizing legitimate resistance to unlawful case processing.

The goal is not merely a more accommodating system, but a system in which the right to correct case investigation, real contradiction, and effective correction can be enforced. Research on institutional failure suggests that the counter-response is not cosmetic language about trust, but what research on institutional betrayal and institutional courage, especially by Jennifer J. Freyd and colleagues (Smidt, Adams-Clark & Freyd, 2023; Smith & Freyd, 2014), calls *institutional courage*: transparency, documentable accountability, the possibility of criticism without reprisals, and a concrete willingness to repair when the institution itself has produced the harm. [31]

3.18 Overall Conclusion

1. Institutional gaslighting should not be understood as an ordinary administrative error, but as a cumulative mechanism in which procedural errors can have narrative and psychologically harmful effects.
2. The concept is legally relevant when the citizen's access to information, contradiction, data rectification, and effective review is weakened while a one-sided case narrative is recirculated.
3. Danish law already provides central safeguards against the mechanism through the official principle, consultation of parties, access to files, the duty to give reasons, record-keeping duties, guidance duties, and data accuracy.
4. Articles 6, 8, and 13 of the European Convention on Human Rights are relevant when procedural errors affect civil rights, family life, private life, personal data, or access to effective remedies.
5. Article 3 of the European Convention on Human Rights and Article 16 of the Convention against Torture should only be applied in serious, prolonged, power-asymmetric, and psychologically degrading trajectories where the state does not ensure effective protection or investigation.
6. The clinical analysis should be used as a harm and consequence analysis, not as automatic diagnosis of affected citizens.
7. The Practice-based examples should be understood as qualitative indicators of mechanisms and always compared with complete case files, metadata, and concrete documentation.

8. The reform proposals should be targeted to the precise links in the chain: hidden documentation, lack of contradiction, recirculation of disputed information, weak review, and lack of redress.

9. The strength of the white paper lies in its interdisciplinary cross-reading of administrative law, human rights, data protection, clinical stress understanding, and institutional behavior analysis.

10. For legal use, the conclusion should always be formulated close to the documentation: not that the system necessarily had a conscious plan to cause harm, but that the overall institutional practice may objectively have produced a reality-distorting and correction-inhibiting effect.

Part IV – Overall Synthesis, Assessment Model, NH Model, and Reform Program

4.1 The Relationship Between Systemic disempowerment and Institutional Gaslighting

As established in Part I, systemic disempowerment and institutional gaslighting do not describe competing concepts, but two levels of the same problem field.
Part IV therefore uses the distinction between loss of effect and loss of reality correction as an overall synthesis, not as a new definition.

Systemic disempowerment may be present when the citizen receives no response, when the case does not move, when responsibility is unclear, when processes are unpredictable, or when documentation has no visible effect.

Institutional gaslighting may be present when, in addition, there is narrative lock-in, credibility undermining, reuse of inaccurate or disputed information, lack of access to correct the case files, pathologization of the citizen's reaction, or institutional confirmation of a distorted understanding of the case.

4.2 Two-Step Test

4.2.1 Test 1: Is Systemic disempowerment Present?

• Power and dependency relationship.
• Repeated attempts to have an effect.
• Missing or rhythmless response.
• Displacement of responsibility.
• Weakened correction opportunity.
• Psychological, physiological, social, or functional strain.
• Lack of repair.

4.2.2 Test 2: Is Institutional Gaslighting Present?

• Narrative production.
• Recirculation of burdening or disputed formulations.
• Credibility undermining.
• Weakened contradiction.
• Uncritical authority confirmation.
• Pathologization of the reaction.
• Closure of reality.

4.3 Evidence Matrix

The evidence matrix is the white paper's practical documentation tool. It should be used to connect concrete case files, events, decisions, case notes, emails, meeting notices, complaint responses, access-to-file processes, and health consequences with the white paper's conceptual hierarchy.
The purpose is not to prove institutional gaslighting based on one single error, one inaccurate piece of information, or one criticizable formulation. The purpose is to examine whether a documentable pattern can be demonstrated over time, where the citizen's effect is weakened, where the case's picture of reality shifts, and where the correction opportunity does not function effectively.

The evidence matrix should therefore be read in continuation of the two-step test in section 4.2:

First, examine whether systemic disempowerment is present.

Then, examine whether the trajectory also contains the intensified mechanism that can be characterized as institutional gaslighting.

The matrix must not be applied mechanically. It is an analytical support tool intended to ensure that the assessment becomes document-based, proportional, and professionally testable.

4.3.1 First Evidence Level: Loss of Effect

The first evidence level concerns systemic disempowerment. Here, the question is whether the citizen has repeatedly attempted to create contact, clarification, help, correction, or movement without the system responding in a way that created real effect.
Relevant evidence sources may include:

• inquiries from the citizen
• reminders
• requests for meetings
• requests for access to files
• complaints
• letters of concern
• Medical or psychological statements
• meeting minutes
• municipal case notes
• emails between authorities
• decisions without subsequent implementation
• notes on lack of follow-up

The central evidentiary question is:
Has the citizen over time attempted to create effect without the system creating real clarification, movement, correction, or holding?

If the answer is yes, there may be a documented loss of effect. This is the core of systemic disempowerment.

4.3.2 Second Evidence Level: Weakened Correction Opportunity

The second evidence level concerns the citizen's ability to correct the factual and legal basis of the case.
Here, the question is whether the citizen has genuinely had access to see, understand, comment on, and correct the information used in the case.

Relevant evidence sources may include:

• access-to-file requests
• decisions on access to files
• delayed disclosure of files
• omitted appendices
• missing record-keeping
• missing notes
• missing party consultation
• party consultation after the decision has already been made
• decisions based on information the citizen has not seen
• the authority's refusal to correct inaccurate information
The central evidentiary question is:
Has the citizen had a real and timely opportunity to correct the information, assessments, or narratives that became significant in the case?

If the answer is no, the correction opportunity is weakened. This can constitute an independent legal-safeguards problem and, at the same time, be a central indicator of institutional distortion of reality.

4.3.3 Third Evidence Level: Narrative Shift

The third evidence level concerns whether the factual reality of the case has gradually shifted in the authority's documents.
Here, the question is whether original information, concerns, events, or rights-based objections are later reproduced in a way that changes their meaning.

Relevant evidence sources may include:

• early inquiries compared with later case notes

• meeting minutes compared with decisions
• the citizen's own written objections compared with the authority's reproduction of them
• professional statements compared with the authority's conclusion
• complaint responses in which the citizen's central submissions are not addressed
• repetition of untested formulations in new documents

The central evidentiary question is:
Has there been a documentable shift from the citizen's original information or objections to a later authority narrative that presents the case in a more burdening, one-sided, or insufficiently reality-tested way?

If the answer is yes, there may be a possible sign of institutional distortion of reality.

4.3.4 Fourth Evidence Level: Recirculation

The fourth evidence level concerns whether burdening or disputed information is reused across documents, departments, decisions, complaint responses, or oversight without independent reality-testing.
Recirculation is particularly serious because information can gain increasing authority merely because it is repeated. Untested information can thereby develop into administrative truth.

Relevant evidence sources may include:

• repeated formulations in case notes
• reuse of earlier assessments without new reasons
• complaint responses that rely on the authority's own earlier notes
• oversight responses based on the municipality's account without underlying file control
• decisions in which earlier disputed information is reproduced as undisputed fact

The central evidentiary question is:
Have burdening, inaccurate, incomplete, or disputed pieces of information been repeated without independent review and without genuine treatment of the citizen's objections?

If the answer is yes, there may be a possible sign of recirculation of an insufficiently reality-tested narrative.

4.3.5 Fifth Evidence Level: Credibility Undermining

The fifth evidence level concerns whether the citizen's reactions, protests, documentation, or insistence are recoded as signs of personal problems.
Here, the question is whether the citizen's attempts to correct the case are described as conflict, lack of cooperation, rigidity, lack of insight, overinvolvement, mistrust, or psychological strain without the authority simultaneously examining whether the reaction may be an understandable consequence of the system's own process.

Relevant evidence sources may include:

• case notes about the citizen's behavior
• meeting minutes
• internal assessments
• child welfare assessments
• psychological or social-professional descriptions
• decisions in which the citizen's reaction is used as a burdening factor
• lack of assessment of the system's own role in the strain
The central evidentiary question is:
Is the citizen's reaction to the system's lack of response, errors, or lack of transparency used as evidence against the citizen without the context of the reaction being examined?

If the answer is yes, there may be a possible sign of credibility undermining and pathologization of the reaction.

4.3.6 Sixth Evidence Level: Institutional Confirmation

The sixth evidence level concerns whether other authorities, complaint bodies, oversight authorities, management layers, or professionals carry forward the authority's narrative without independent reality-testing.
This level is central because institutional gaslighting does not arise only in the original case processing. It can be intensified when control bodies or higher management levels confirm an already shifted case picture.

Relevant evidence sources may include:

• complaint decisions
• oversight responses
• management responses
• municipal accounts
• ministerial responses
• appeal responses
• refusals to reopen
• responses that only refer to the authority's own account
The central evidentiary question is:
Has a later body confirmed the authority's understanding of the case without reality-testing the concrete objections, documentation breaks, or correction failures?

If the answer is yes, there may be institutional confirmation of an insufficiently reality-tested narrative.

4.3.7 Seventh Evidence Level: Strain and Harmful Effect

The seventh evidence level concerns the human consequences.
Here, the question is whether the trajectory has caused or worsened psychological, physiological, social, relational, or functional strain.

Relevant evidence sources may include:

- medical records
- psychological statements
- psychiatric assessments
- sick leave certificates
- sleep problems
- stress symptoms
- functional decline
- social withdrawal
- worsening of existing disorders
- the child's distress
- consequences for family relationships

The central evidentiary question is:
Is there documentation that the system's lack of response, lack of correction, unclear process, or narrative shift has caused or worsened strain in the citizen, the child, the family, or the affected professional?

If the answer is yes, this strengthens the assessment that the trajectory involves not merely formal errors, but a process with real harmful human effect.

4.3.8 Overall Assessment

The evidence matrix must be used cumulatively. This means that the individual evidence levels do not necessarily prove institutional gaslighting each on their own. The decisive question is whether, together, they show a pattern.
A strong documentation exists, especially when the following conditions can be shown at the same time:

- The citizens are in a power and dependency relationship
- the citizen has repeatedly attempted to create effect
- the system's response has been deficient, delayed, fragmented, or without real consequence
- The citizen's correction opportunity has been weakened
- burdening or disputed information has been maintained or recirculated
- The citizen's reaction has been used as a burdening factor
- complaint or oversight systems have confirmed the authority's narrative without full reality-testing

• the trajectory has had documentable psychological, physiological, social, relational, or functional consequences
Where these conditions are only partially present, there may be grounds to speak of systemic disempowerment or institutional distortion of reality.
Where they appear together, over a prolonged period, and in a power-asymmetric dependency relationship, there may be grounds to examine whether the trajectory constitutes institutional gaslighting.

The evidence matrix must therefore not be used to overconclude. It must be used to ensure that serious patterns are not reduced to isolated errors, subjective dissatisfaction, or ordinary conflict.

4.3.9 Evidence Matrix

Step 1
Question: Is there a power and dependency relationship?
Possible conclusion: If no, do not use the concepts systemic disempowerment/gaslighting. If yes, continue.
Step 2
Question: Has the person repeatedly attempted to create effect?
Possible conclusion: If yes, examine systemic disempowerment.

Step 3
Question: Has the system's response been rhythmless, unclear, delayed, or without consequence?
Possible conclusion: Possible loss of effect.

Step 4
Question: Has the person had a real and timely correction opportunity?
Possible conclusion: If no, possible institutional distortion of reality.

Step 5
Question: Have burdening or disputed pieces of information been recirculated?
Possible conclusion: Possible narrative lock-in.

Step 6
Question: Has the person's reaction been used as evidence against the person without field analysis?
Possible conclusion: Possible credibility undermining.

Step 7
Question: Has a complaint/oversight body confirmed the narrative without independent reality-testing?
Possible conclusion: Possible institutional confirmation.

Step 8
Question: Is there documentable psychological, physiological, social, or functional strain?
Possible conclusion: Strengthened assessment of seriousness.

Step 9
Question: Are several links fulfilled together, over time, and with power asymmetry?
Possible conclusion: Examine institutional gaslighting.

4.4 NH Model, Management Responsibility, and Holistic Account

The NH model is the white paper's primary operationalization of NMU in administrative practice. It makes it possible to examine whether the system carries the whole, or whether the citizen, child, family, or employee is made to carry the system's fragmentation. Systemic disempowerment often arises between departments, levels, and areas of responsibility. It therefore cannot always be understood from one single organizational point.

The NH model is built on a nature-centered and legal holistic understanding in which coordination is understood as the system's nervous system, knowledge sharing as the system's memory, continuity as the citizen's regulatory foundation, and management responsibility as the system's ability to carry the whole.

When the system is complex, responsibility for the whole must not be left to the citizens.

4.4A The NH Model as a Rhythmic Administrative Model

In this white paper, the NH model should be understood as a rhythmic administrative model. It translates NMU's concepts into organizational responsibility: coordination as the system's nervous system, knowledge sharing as the system's memory, continuity as the citizen's regulatory foundation, and management responsibility as the system's ability to carry the whole.
At employee level, the NH model concerns recording, responding, documenting, and handing over precisely. At department-manager level, it concerns coordination, handover, and professional coherence. At chief level, it concerns the whole, consequence assessment, and cross-cutting responsibility. At executive management level, it concerns ensuring that the system can see and correct its own effect.

Typical errors in holistic accounts are standard responses, unclear responsibility, absence of a timeline, missing assessment of the citizen's documentation, no assessment of deselection, no strain assessment, and no concrete repair.

The NH model prevents systemic disempowerment by moving responsibility for the whole back to the system. It documents responsibility without individualizing blame.

4.4B The NH Model as Operationalization of NMU in Administration

The NH model translates NMU into administrative practice. It makes it possible to examine whether the system carries the whole, or whether the citizen, child, family, or employee has been made to carry the system's fragmentation.
Employee level: What do I know? What have I received? What have I answered? What must be handed over?

Department-manager level: Is there an overall timeline? Has information been shared? Have deselections been assessed for consequences?

Chief level: Where does the system break down? Which departments must be brought together? Which patterns repeat themselves?

Executive management level: Has the citizen been made to carry the system's fragmentation? What must be corrected, restored, and changed organizationally?

Citizen/lay representative: What has been attempted? What has not worked? Which documentation has not been assessed?

Typical errors in holistic accounts are words such as "ongoing," "relevant," "is assessed," and "known to the system" when they are not accompanied by dates, documents, responsibility, consequence, and concrete effect. The NH model therefore requires precision: who did what, when, on what basis, with what effect, and how was the break repaired?

4.4C The Three Versions of the NH Model: Master, Audit, and Public Model

The NH system should be applied in a differentiated way so that the tool fits the purpose. The master version is used when the case must be lifted to executive management level, and management responsibility must be locked in. The audit version is used when the case must be readable by oversight bodies, auditors, the Social Appeals Board, the Ombudsman, or legal actors. The public version is used when the citizen, relatives, the press, or civil society need overview and understandability.
In brief: The master version creates responsibility upward. The audit version creates evidence and traceability. The public version creates transparency and legitimacy.

4.4D Legal Status of the Reform Proposals

Timely access to files, party consultation, and reasons
Status: Existing law / strengthened practice.
Rationale: Anchored in the Public Administration Act, the Access to Public Administration Files Act, the official principle, and good administrative practice.

Contradiction trace for disputed information
Status: Administrative recommendation / reform.
Rationale: Makes the citizen's correction visible in all later stages of the case.

Immutable journal and document traces
Status: Digital administrative standard / reform.
Rationale: Prevents document distortion and secures version history.

Independent reality-testing in serious patterns
Status: Reform / oversight recommendation.
Rationale: Ensures that the authority's own account does not alone carry the review.

Trauma- and strain-informed complaint handling
Status: Administrative recommendation.
Rationale: Prevents strain reactions from being used to undermine credibility.

The reform program must be read at three levels: existing law, strengthened administrative recommendation, and political reform proposal. This marking must prevent recommendations from being misread as already existing law.

4.5 Reform and Prevention Program

The reform program should be read at three levels: existing law and existing guarantees, recommended administrative practice, and political reform proposals.
Existing law: correction rights must have real effect.

Recommended administrative practice: contradiction trace, narrative audit, correction pause, documentation and version traces, and health-related consequence assessment.

Political reform proposals: real consequences for repeated breaches of guarantees, independent reality-testing, right to qualified assistance, and independent investigation in particularly serious cases.

Institutional courage: transparency, accountability, independent investigation, protection against reprisals, concrete repair, and access to criticism without punishment. [31]

4.6 Overall Conclusion

Systemic disempowerment describes what happens when the person loses effect in the encounter with the system. Institutional gaslighting describes what happens when the system, in addition, takes over or distorts the reality the person is trying to correct.
A system can have good intentions and still create powerlessness. A system can follow procedures and still lose sight of the human being. A system can produce documentation and still lack truth. A system can be lawful in form and harmful in effect.

For that reason, we must move from function to resonance. From demands for resilience to sustainable fields. From fragmentation to wholeness. From silence to response. From documentation power to the right of correction. From displacement of responsibility to repair.

Sources and Notes Apparatus

The sources below are structured so that the white paper can be read as one integrated professional text. The source apparatus was subjected to final academic quality assurance on June 13, 2026. Legal sources are used especially in Part III and Part IV, while the research- and NMU-relevant sources in [40]-[69] primarily support the author-year references in Part II. Central ICD-11, Danish National Audit Office, Ombudsman, human rights, and statutory sources were previously checked on May 30, 2026, and June 8, 2026; in this version, source format, primary sources, DOIs, statutory consolidation references, and current ICD-11 references have been standardized and updated.
To strengthen the source apparatus, the references should be read hierarchically: primary legal sources include Danish law, EU law, the European Convention on Human Rights, and UN conventions; control and oversight sources include the Danish National Audit Office, the Public Accounts Committee, the Parliamentary Ombudsman, the Danish Data Protection Agency, and the Social Appeals Board; clinical classification sources include WHO ICD-11 MMS and CDDR; theoretical sources include gaslighting, epistemic injustice, institutional betrayal, DARVO, and bias literature. The references have been standardized in an APA/legal-inspired style with title, publisher/journal, year, volume/issue/pages, DOI and/or stable official URL where available.

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