PROJEKT PAULUS

Institutional Deference
When authorities' words replace evidence

Information from public authorities, human rights and the risk of corruption
Denmark 2006 to 2026

Dedicated to Jørn Herkild
for his extensive work over decades in articulating
the deference addressed by this report.



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18 November 2026

Ex officio et ex conscientia.

1 Principal conclusion

Public employment is no guarantee of truth. Yet this report documents how public institutions have allowed the status of the source, internal accounts and colleagues' assessments to replace the examination of evidence that those institutions were themselves obliged to undertake.

The problem arises within the chain of oversight itself. An item of information is entered in an official case file. Another authority adopts it. An appeal body refers to the material. The individual then faces several institutions in agreement, although their agreement still rests on the same original source. More authorities have become involved, but there is no new independent corroboration.

We call this mechanism **evidential deference**: a subsequent body follows an earlier public actor's statement without the independent scrutiny required by the significance of the information and the specific objections raised. The report's specific evidence and findings appear in Chapters 3-6.

The allegation is precise. Authorities have excluded relevant evidence, failed to investigate specific contradictions and given reasons for decisions by endorsing other public actors' assessments. This has weakened the individual's ability to challenge the basis of the decision. The documented Danish human rights case also shows that several levels of national oversight can approve an interference while decisive matters remain unexamined.

The duty of truthfulness is an obligation on the person providing information. It is not evidence that the obligation has been fulfilled. An oversight authority that responds to specific counterevidence with a general reference to another authority's credibility does not address the counterevidence. It replaces scrutiny with trust.

Nor is the legal starting point a rule that public employees are always right. Danish law requires adequate investigation of the case, consultation of the party where required, and specific reasons. Conditional evidential presumptions exist. Their conditions must be established; they cannot be extended into a general privilege of truthfulness. [1] [2] [3] [4]

The corruption perspective concerns the institution's function: when oversight perpetuates information from the system under scrutiny without the necessary examination, it may protect an erroneous official narrative rather than correct it. The documented failings are established in their own right. Classification as institutional corruption additionally requires a demonstrated systemic and strategic displacement of purpose; individual criminal liability requires proof of the elements of the particular offence. Chapter 7 explains this boundary and identifies responsibility without inventing motives.

Projekt Paulus demands that information from authorities be traceable to its basis, that specific counterevidence be investigated, and that documented errors be corrected throughout the chain in which they have had an impact. The individual's right to review must not depend on whether their source uses official letterhead.

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2 What deference does to evidence

2.1 From information to apparent corroboration

A note primarily documents what its author recorded. It does not, without more, prove that the recorded event occurred, that a reported statement was reproduced accurately, or that a professional assessment rests on correct premises. Each of these questions requires its own examination.

We therefore distinguish four stages: the observation, its recording, the subsequent account and the conclusion drawn. Error can arise at each stage. If an account is subsequently presented as evidence of its own accuracy, the source chain has become circular.

Stage in the chain	What the information can actually show	What the next body must examine
Original observation or document	What was seen, said, measured or written at the time in question	Authenticity, context, completeness and relevance
The authority's note	What the authority recorded about the observation	Whether the note accords with the original and distinguishes fact from assessment
Another authority's summary	What the recipient has recounted	Whether the statement has been altered, strengthened or detached from its premises
Appeal decision or court judgment	Which premises were relied upon	Whether the decisive premises have been proved and counterevidence addressed

The table is Projekt Paulus' analytical model. It is not a new rule of evidence. It gives practical effect to the existing duties to investigate and give reasons: find the original, identify the disagreement, and show why the selected facts can support the decision.

2.2 Repetition does not create source independence

If a municipality, a supervisory authority and an appeal body refer to the same municipal note, there is one original source of information with several subsequent accounts. Three public sources repeating it do not make the underlying source three times as independent.

The decisive question is therefore not simply how many bodies have endorsed an item of information. It is what each body itself investigated, which original material it examined, and how it dealt with the specific objection. An oversight decision may be a new document without being new evidence of the disputed events.

This distinction directly affects the individual. Otherwise, an original error can reappear as adverse historical information in new cases. The earlier outcome comes to justify the next, while the original error is never examined.

Finding: Evidential weight depends on the basis of the information and the scrutiny it has received. It does not depend on the number of authorities repeating it.

3 Municipal supervision: the account of the supervised authority as the basis for oversight

3.1 Rigsrevisionen's documented findings

Conclusion: Rigsrevisionen documented a supervisory system that had failed to secure a sufficiently independent basis for its scrutiny of municipalities.

Report 18/2024 covered 1,669 closed case registrations from 2018-2024: 1,114 rejected and 555 investigated. These are case registrations, not unique individuals. The audit's overall review of material covered 1,839 cases and must not be confused with this defined population. Written consultation did not amount to verification of the facts.

In a case concerning a contact person for children, an individual submitted written material contradicting the municipality's account of a general decision. The supervisory authority obtained another statement and closed the case on the basis of the municipality's explanations. The audit criticised the basis of the investigation; it did not establish that additional material would have changed the outcome.

The report also showed inadequate follow-up on actual compliance. No sanctions were used in the material examined.

Finding: The account given by the authority under scrutiny could carry decisive weight without the supervisory authority documenting the necessary examination of the contradictory material. This is a specific failure of oversight with significance beyond an isolated administrative error.

Source: [5]. Basis of the investigation, printed pp. 17-20, Box 3 on p. 19; responses, pp. 24-29; methodology, pp. 31-39. PDF page numbers are seven higher than printed page numbers.

3.2 Ankestyrelsen's reasoning: the municipality's duty of truthfulness

Conclusion: Ankestyrelsen used a duty to tell the truth as a reason for trusting the municipality's information.

In the contribution to the ministerial statement dated 19 August 2025, Director Cathrine Due Billing wrote that, as a starting point, the supervisory authority should be able to rely on the municipality's information, on the grounds of the municipality's duty of truthfulness. The contribution also acknowledged the investigative principle and new guidelines on assessing the need for supplementary documentation.

The agency further stated that resources had been transferred from supervision to appeals from 1 May 2025, and that average supervisory processing times were expected to increase. The 4-5 full-time equivalents allocated to supervision in the social field in 2024 were expected to be maintained. This was therefore a lowering of the priority of supervision as a whole, not a documented reduction in those particular full-time equivalents.

Finding and demand: Trust may be a starting point. Where a case contains a specific contradiction, the supervisory authority must investigate it. A resource allocation may explain the authority's choice; it does not discharge the duty to investigate. Responsibility for the basis of oversight remains with Ankestyrelsen.

Source: [6]. Resources, pp. 2-3; documentation, p. 4; follow-up, pp. 5-6.

3.3 New guidelines document a change in the rules

Rigsrevisionen's memorandum of 10 October 2025 confirmed that new guidelines required consideration of whether further documents should be obtained. The audit had reviewed the guidelines and closed that particular follow-up point. It continued to follow up on processing times, follow-up rules and the statutory framework for supervision. The memorandum also noted that the minister had taken no initiatives to address the criticised waiting times, while resources had been transferred away from supervision. [7]

As of 17 November 2026, Report 18/2024 remained among the open cases, with the memorandum of 10 October 2025 the most recent linked memorandum for that report. [8]

Finding: Scrutiny of new guidelines documents what the guidelines now say. It does not, in itself, establish changed compliance in practice, redress in earlier cases or an end to the previously identified breaches of law. Each of these outcomes requires its own evidence.

3.4 The draft reform describes an existing duty

In its account of the law in force, the consultation draft of 14 September 2026 described a duty to secure sufficiently reliable information and resolve significant factual doubt. Depending on the circumstances, information from other authorities or experts requires independent, critical assessment. The draft retained trust as a starting point, but also emphasised the need for active verification. The proposed express provision was described as codifying the supervisory authority's independent and active duty. [9]

Finding: The documented duty of scrutiny did not depend on a future reform. The decisive criticism is non-compliance with a duty that already applied. The draft is used here as a dated ministerial description of that legal position, not as an independent statutory basis currently in force.

Source: [9]. Pp. 20-22. The draft's own proposed commencement date is 1 July 2027, p. 3.

3.5 The Ministry of Foreign Affairs: trust in recordkeeping limited the search

Conclusion: The ministry's assumption of proper recordkeeping was used to justify limiting the scrutiny intended to locate relevant material.

Foreign Minister Anders Samuelsen's answer of 1 August 2018 to REU question 982 linked the statement of 25 January 2017 concerning all identifiable Tibet material to the agreed search method. The practice of omitting general backup searches was justified by assumed compliance with the rules, including recordkeeping duties. General searches of backups, Enterprise Vault and the minister's shared mailbox had not been considered. The answer also described one targeted Outlook and Enterprise Vault search following an employee's report; according to the ministry, this yielded no relevant material.

Finding and demand: A statement about all identified material must be read alongside what was actually searched. Trust in employees' compliance does not establish complete recordkeeping. The reviewing body must be able to examine the systems selected, search boundaries and results. One targeted search on a particular occasion cannot by itself verify the completeness of the entire body of material.

Source: [10]. Pp. 1-3; announced changes, p. 4.

3.6 Copenhagen: central knowledge requires scrutiny of the result of remediation

The speaking notes submitted as the answer to SOU question 127 in November 2026 state that the Copenhagen waiting-list case had been before Ankestyrelsen since 2022 and known to the Ministry since autumn 2024. They reproduce the municipality's report of 26 June 2026 that purchases of external residential placements would slow because of financial pressure, prolonging waits for people outside the urgent-priority group. The Ministry also reports forwarding press coverage and states that Ankestyrelsen had initiated further inquiries.

Evidential significance: The document locates a dated statement of knowledge and reported supervisory action centrally within the system. Forwarding information, adopting a plan and opening another inquiry are distinct procedural steps. They must be followed through to actual compliance and fulfilment of individual entitlements.

Finding and demand: The supervisory authority must verify whether the known unlawful waiting-list arrangement has ended and assess necessary enforcement measures. The municipality's financial explanation does not alter the supply obligation maintained by the Ministry itself. Responsibility must follow knowledge, powers and actual follow-up.

Source: [11]. Pp. 3-10 and 13.

4 Five Danish cases involving failures to examine evidence

4.1 Ankestyrelsen 2018: private witnesses excluded on grounds of status

Conclusion: Ankestyrelsen allowed witnesses' lack of official affiliation to obstruct the collection of relevant evidence.

A homeless individual had offered three named witnesses concerning his presence in Denmark. Among other things, Ankestyrelsen attached weight to the fact that they did not:

> *represent an authority, an organisation, or another official body*

The statement is reproduced in FOB 2018-31. The Ombudsman rejected this approach under the investigative principle and the principle of free assessment of evidence. A heightened burden of documentation on the individual did not extinguish the duty to investigate.

The error arose at the very threshold of the assessment of evidence: relevant testimony was excluded before its content had been obtained. Responsibility rested with Ankestyrelsen as the body deciding the appeal. The Ombudsman recommended reopening the case; the agency stated that the witness information should be capable of being considered in a fresh examination.

Finding and demand: The case documents a specific status-based bias. Relevant private witnesses must be assessed by what they can contribute, and the evidential weight of their testimony must be assessed in the particular case.

Source: [12]. Pp. 8-14, especially section 4.3, and pp. 29-30. Opinion of 29 October 2018.

4.2 Ankestyrelsen 2016-2017: the municipality's telephone note became expert evidence

Conclusion: The appeal body failed to undertake a specific, available check of a decisive expert statement.

A wheelchair user was refused support for four-wheel drive. The municipality's telephone notes concerning a state advisory unit underpinned the assessment that an approved ATV was sufficient. The individual pointed to misunderstandings about his working conditions, submitted contradictory professional information, and stated that the unit's assessment had now changed. He gave Ankestyrelsen the staff member's direct telephone number.

The agency did not contact the unit. It later referred to the unit's expert status and the municipality's notes as documentation. The Ombudsman found that the individual had raised relevant doubt about a significant part of the basis of the decision. The information had to be checked with the unit. He found the basis inadequate and recommended reopening the case for a new decision.

Finding and demand: A municipal account was perpetuated as evidence of the expert view. Ankestyrelsen bore its own investigative responsibility and should have pursued the specific opportunity to resolve the contradiction. The legal consequence was reconsideration on an adequate basis; the opinion did not establish a final entitlement to the vehicle applied for.

Source: [13]. FOB 2017-17, 7 July 2017, printed pp. 4-10 and 19-20/PDF pp. 5-11 and 20-21.

4.3 Kriminalforsorgen 2016: counterevidence narrowed, video lost

Conclusion: The investigation of potentially unlawful use of force was inadequate and misrepresented the counterevidence.

In FOB 2016-52, the Directorate asserted that information about pushing appeared in only one fellow prisoner's statement. The Ombudsman found that several prisoners had described pushing. At the same time, the Directorate based its assessment on staff accounts and an officer's account of a video that had already been deleted.

The Ombudsman criticised the overlooked information, the failure to view the available video before deletion, and the delay of more than four months in contacting the other witnesses. The inadequate basis could have affected the warning given to the prisoner. It was not conclusively established that the pushing had occurred.

Finding and demand: The established failure is the loss of independent evidence and the inadequate examination of the staff's version. Kriminalforsorgen should have secured and examined the material before it disappeared and addressed all known relevant contradictory information. Otherwise, the employee's account remains while the opportunity for direct verification is lost.

Source: [14]. Original opinion of 8 December 2016, pp. 3-9 and 19-20.

4.4 Municipal employment case: a police summary supported an untenable consequence

Conclusion: The municipality relied on the police's brief account without examining the original material that the municipality itself treated as decisive.

In FOB 2009 20-6, a municipality had dismissed a childcare professional in February 2006 and excluded him from future work with children and young people. The municipality's maintenance of its position and the Ombudsman's review in 2007-2009 fall within the report's study period.

The municipality read police reports but did not view the decisive video-recorded interview or examine the reasons why the charge had been dropped. It allowed a brief case heading to support a conclusion the police had not themselves drawn. The Ombudsman criticised the basis of the investigation and established that the municipality could not apply the stated trust criterion to later applications for work with children.

Finding and demand: A summary could not support the adverse conclusion without examination of the original basis. The error affected both the employment and future job opportunities. The municipality's responsibility included ceasing to use the inadequately substantiated criterion.

Source: [15]. Original opinion of 5 October 2009, pp. 3-9. The year and date of the original are used.

4.5 Ankestyrelsen 2012: endorsement replaced reasons

Conclusion: Ankestyrelsen did not discharge its duty to give reasons merely by endorsing a consultant physician's assessment.

A couple with cerebral palsy were refused assisted reproduction. The original reasons stated only that the agency found no basis for departing from the consultant physician's assessment. The consultant physician's written refusal had likewise failed to identify the decisive considerations.

In FOB 2012-17, the Ombudsman required reasons setting out the principal considerations that had determined Ankestyrelsen's own assessment, under section 24 of the Danish Public Administration Act. The case's significance for family life heightened the need for visible reasons. The criticism concerned the original reasons; the refusal itself was not overturned following later elaboration.

Finding and demand: Endorsement does not transfer responsibility for giving reasons to the professional whom the authority cites. The individual must be able to see and challenge the specific premises that the appeal body itself applied.

Source: [16]. Opinion of 22 October 2012, pp. 5-7.

4.6 What the cases show collectively

The cases concern different stages of the same process: access to submit evidence, verification of accounts, preservation of original material, investigation of adverse information, and visible reasons. The advantage accorded to authorities may therefore arise long before the final weighing of the evidence.

The shared responsibility cannot be explained away by saying that the information came from others. The receiving body makes its own decision. It must be able to show why the basis is adequate for that particular decision and its consequences.

Overall finding: Deference is not merely a matter of believing an incorrect sentence. It can consist of organising case handling so that the official version remains in place while the individual's opportunity to challenge it is blocked or emptied of substance.

5 Danish law: trust does not extinguish investigative responsibility

5.1 Doubt must be resolved, including between authorities

Section 10 of the Danish Act on Legal Protection and Administration in Social Matters places responsibility for the adequate investigation of social cases with the deciding authority. Paragraph 98 of the guidance on that Act specifies the duty to resolve significant factual doubt and states expressly:

> *This also applies to information obtained from another authority.*

The Ombudsman's guide for authorities likewise describes the general investigative principle. Responsibility remains even when other authorities supply the information. The scope of the investigation depends, among other things, on the seriousness of the interference and the specific doubt. [1] [2] [17]

The legal breach arises when the authority fails to carry out the investigation required by the particular case. An abstract starting point of trust does not address an identified document, a particular discrepancy or a named witness. The authority must consider the substance and explain why it does or does not change the basis of the decision.

As early as FOB 1993.119, trust as a starting point was described as conditional. The Ombudsman pointed out that, depending on the circumstances, heightened attention might be warranted where a previously rejected decision was maintained on new grounds. This applied particularly to new information that had not formed part of the original decision. The specific case did not lead to criticism of the ministry. The opinion is used here as a historical source of legal standards, not as a case from 2006-2026. [18]

5.2 Højesteret's 2026 judgment: a conditional presumption

In the judgment of 28 May 2026, BS-38653/2025-HJR, a medical certificate for compulsory admission from 2013 had become illegible after scanning. Højesteret began with the free assessment of the evidence in the particular case and applied a strong presumption concerning the certificate's legally required content, **if the prescribed procedure could be accepted as having been followed**.

The Court relied specifically on the police request, approval by a duty legal officer, and a medical record entry stating that the certificate had been read aloud to the consultant physician. The admission was held lawful; the subsequent detention was to be reconsidered by the patient complaints board. [4]

Finding and demand: The judgment must be read on its own terms. The Court must have a sufficient evidential basis in the particular case for finding that the prescribed procedure was followed. It is not a general rule about public employees' truthfulness. When an authority invokes a presumption, it must identify the legal basis, the precise fact to be proved, and the evidence that the conditions are met.

5.3 Counterevidence must be capable of being submitted and answered

As a general rule, section 19 of the Danish Public Administration Act requires consultation concerning significant and adverse factual information or external professional assessments which the party cannot be assumed to know are held by the authority; the provision contains express exceptions. Sections 22 and 24 generally require reasons for written decisions, setting out the necessary material facts and, where discretion is exercised, the decisive principal considerations. [3]

Where facts are disputed, the Ombudsman's guidance states that the reasons should normally show the disagreement and the factual version selected by the authority. [19] Listing the individual's objections is not the same as answering them. The reasons must make it possible to understand why the decisive premise is maintained.

The courts' free assessment of evidence under section 344 of the Danish Administration of Justice Act establishes no general hierarchy in which official statements automatically prevail over private ones. Subject to the conditions in sections 298-300, the court may order the production of documents. [20] The original, the contemporaneous records and the basis of an account are therefore specific objects of an evidential dispute.

5.4 Errors must be corrected throughout the information chain

Under the general non-statutory rules, an individual is entitled to have a case reopened if new factual information emerges that is sufficiently significant to create some probability of a different outcome. Procedural errors of more than minor significance and significant new legal circumstances with retroactive effect may also make reopening necessary. Where errors are general, the authority must also assess earlier comparable cases under the rules on reopening on its own initiative. [21] [22]

For ordinary administrative processing of personal data, Article 5(1)(d) GDPR requires information to be accurate and, where necessary, kept up to date. Article 16 provides for rectification and completion. Article 18(1)(a) grants a right to restriction while disputed accuracy is being verified, subject to the limited possibilities for continued processing under paragraph 2. Article 19 requires recipients to be notified of rectification or restriction, unless this is impossible or involves disproportionate effort. The data subject may request information about the recipients. The rules apply from 25 May 2018; police processing for law-enforcement purposes is governed separately. [23]

Datatilsynet's guidance distinguishes factual errors, disagreement and professional assessments. A public authority must normally retain the original record and attach the clear correction or objection to it. A contradictory medical statement should be included. A professional assessment is not automatically deleted because the individual disagrees with it. [24]

Finding and demand: A correction must be visible where the information is used. Recipients must be notified under the applicable conditions. Otherwise, an error already acknowledged may continue to form the basis of a decision at the next level of authority.

6 Human rights: oversight must work in practice

6.1 Aggerholm v. Denmark: several levels of oversight failed to secure Article 3

Conclusion: Denmark violated Article 3 even though domestic courts had approved the course of events.

In *Aggerholm v. Denmark*, a psychiatric patient was subjected to belt restraint for 22 hours and 50 minutes. The European Court of Human Rights (ECtHR) accepted the grounds for initiating the restraint but found the strict necessity of its continuation insufficiently proved. The domestic courts had not addressed decisive matters: the patient's calmer state, almost twelve hours without medical supervision, and an unexplained delay after the decision to release him.

The ECtHR stated:

> *the domestic courts were silent on several issues*

Finding and responsibility: Professional assessments and repeated approvals did not secure adequate scrutiny. The State bore responsibility for the violation of Article 3. Continuing serious interferences require necessity to be specifically documented. The judgment does not establish deliberately false medical statements.

Source: [25]. Judgment of 15 September 2020, final on 15 December 2020, no. 45439/18, §§ 83-85, 92-98 and 102-115, particularly § 110.

6.2 Korošec: the opposing party's own expertise required an effective opportunity to challenge it

In *Korošec v. Slovenia*, the defendant benefits authority's own medical commissions were given decisive evidential weight in a disability case. The court refused the individual's request for an independent expert. The ECtHR found a violation of Article 6(1) because of the particular inequality in the opportunity to challenge the evidence. In practice, the commissions' assessments were decisive for the right at issue. [26]

Finding: Organisational affiliation with the authority is a matter requiring examination when that authority's own expertise becomes decisive. An individual must have a real opportunity to challenge the basis of the decision. The judgment does not impose an unconditional requirement for a new expert in every case; it addresses the particular dependence and decisive evidential weight.

Source: [26]. Judgment of 8 October 2015, final on 8 January 2016, no. 77212/12, §§ 44-57.

6.3 Ramos Nunes: access to a court without sufficient review of the facts

In *Ramos Nunes de Carvalho e Sá v. Portugal*, a judge challenged disciplinary sanctions. Central statements and credibility were disputed. The domestic court limited its factual review and held no hearing. The Grand Chamber found that the combination violated Article 6(1). [27]

Finding: A route of review must be capable of examining the decisive factual questions adequately. Its scope depends on the nature of the case, the administrative safeguards and the specific objections. A court need not assume every assessment of expediency in order to be required to examine the facts supporting a sanction.

Source: [27]. Final Grand Chamber judgment of 6 November 2018, nos. 55391/13, 57728/13 and 74041/13, §§ 176-184 and 203-215.

6.4 Strand Lobben: the child's best interests must be substantiated

In *Strand Lobben and Others v. Norway*, the ECtHR reviewed deprivation of parental responsibility and adoption. The basis included old expert assessments, limited contact, and inadequate consideration of changed family circumstances. The decisive assessment of the child's vulnerability was insufficiently reasoned. Taking the matter as a whole, the Grand Chamber found that the decision-making process had failed to secure the necessary scrutiny and safeguards, and found a violation of Article 8. [28]

Finding: Reliance on the child's best interests entails an obligation to have an up-to-date and adequate basis and to ensure meaningful parental involvement. The purpose cannot do the work of substantiation. The judgment does not require a new expert in every child-related case; it requires the particular interference to be supported by a sound procedure and reasons.

Source: [28]. Final Grand Chamber judgment of 10 September 2019, no. 37283/13, §§ 202-213 and 219-226.

6.5 Independence, effective remedies and the limits of official accounts

Chevrol v. France shows the boundary directly. The French administrative court considered itself bound by a ministerial reply concerning a treaty condition and did not genuinely examine the individual's contradictory documents. The ECtHR found a violation of Article 6(1). [29] The judgment dates from 2003 and is used as prior case law establishing the applicable standard.

In *Ramsahai and Others v. the Netherlands*, significant initial investigative steps after a fatal police shooting were taken by the police district to which the officers involved belonged. Later independent supervision did not remedy the failure. The ECtHR found procedural violations of Article 2 through inadequate investigation and independence. [30] The requirement applies to deaths engaging the State's responsibility under Article 2; it is not an automatic consequence of every administrative error.

Kudła v. Poland requires a remedy effective in law and in practice for an arguable claim of a Convention violation. In that case, no such remedy existed against unreasonable length of proceedings, contrary to Article 13. [31] The judgment of 2000 is prior case law establishing the applicable standard. Article 47 of the EU Charter guarantees access to effective judicial protection for rights guaranteed by EU law; Article 51 defines the limits of the Member States' obligation. A specific connection to EU law must therefore be identified. [32]

Overall finding: ECtHR judgments concerning other countries are legal authorities, not Danish events. They show the requirements against which a Danish chain of oversight must be examined. The number of bodies involved is no measure of effective protection. What matters is whether the relevant objection can be investigated, determined and remedied. Each Danish allegation of a Convention violation must be linked to its own event and right.

7 The corruption perspective: when the purpose of oversight is displaced

7.1 The documented failure and the additional allegation of corruption

Failures in investigation, evidence and reasons can have serious consequences without any payment between the actors. This makes it necessary to examine non-financial mechanisms. At the same time, it makes precise terminology essential: criticism of a documented breach of duty need not await proof of motive, and a motive must not be invented to intensify the criticism.

Level	What the classification requires	What it can justify
Legal failure of oversight	A specific duty, act or omission, and a documented breach	Criticism, reconsideration and other relevant legal consequences
Institutional integrity risk	An oversight arrangement in which dependence or one-sided access to information weakens correction	Demands for independence, access to underlying material, and monitoring of compliance
Institutional corruption under Lessig's definition	Systemic and strategic influence that displaces or weakens the institution's purpose	Analysis of the documented displacement of purpose
Individual criminal liability	All the objective and subjective elements of a specific criminal provision	Individual assessment of liability under applicable law

The levels in the table must not be conflated. The report's specific Danish failings are documented in their respective sources. The table states what further classification requires; it pronounces no collective criminal conviction.

7.2 Institutional corruption is not limited to money

Lawrence Lessig describes institutional corruption as systemic and strategic influence that undermines an institution's effectiveness by diverting it from its purpose or weakening the achievement of that purpose and its credibility. The influence may be lawful under the applicable rules and need not consist of money; ideological influence may also be relevant. Ordinary inefficiency or random errors are insufficient. [33]

Applied to this report's subject, the test is therefore specific: has oversight retained its function as an independent corrective, or has its work been systematically and strategically organised around the system it is supposed to scrutinise? The investigative failures identified in the report make this a relevant question of integrity. A final classification as corruption must rest on evidence of that additional mechanism itself.

Dennis F. Thompson's narrower institutional concept requires a substantial connection to private interests. His analysis cannot be cited as authority for the proposition that internal public-sector self-protection alone is always corruption. [34] The different definitions answer different questions and must be identified when used.

The OECD's *Public Integrity Handbook* links public integrity to external oversight, sufficient independence and follow-up in practice. An institution that can only require explanations performs a different function from an arrangement that can also secure enforcement and correction. [35]

Finding: The absence of bribery does not absolve a failing oversight arrangement from criticism on integrity grounds. Conversely, an error does not in itself make the individual employee corrupt. The analysis must precisely identify the documented act, dependence and displacement of purpose.

7.3 The connection with noble cause corruption and financial considerations

Noble cause corruption denotes the use of unethical or unlawful means to achieve an outcome the actor regards as good or necessary. The official Canadian report *Innocence at Stake* describes the mechanism and its connection to tunnel vision. The concept is used here as an analytical framework; the Danish administrative cases are assessed on their own documents. [36]

Noble cause justification and deference can reinforce each other. An original act may be portrayed as necessary to protect children, the institution or a public interest. If subsequent oversight merely adopts that narrative, the account of purpose is shielded from the examination that should determine whether the means were lawful and necessary. This is an analytical connection, not a documented common motive in all the report's cases.

Financial considerations must be examined in the same way. Information about resource pressure documents a condition affecting priorities or a choice. It does not in itself establish lawfulness, corruption or an intention to mislead. The decisive questions are which duty applied, what the authority actually failed to do, and whether a statutory control or benefit was neglected. A budget cannot serve as proof that factual information is true.

Finding: A noble cause motive requires evidence of the purpose. Deference can be established through the chain of oversight's specific acts and omissions. This report's criticism can therefore stand even where a particular motive has not been proved.

7.4 Danish criminal liability requires individual application of the law to the facts

Section 155 of the Danish Criminal Code covers abuse of public service or office to infringe the rights of private persons or the public. A purpose of obtaining an advantage is an aggravating factor, but is not required under the first limb. Section 156 concerns intentional refusal or failure to perform an official duty or comply with a lawful official order; section 157 covers gross or repeatedly occurring neglect or carelessness. Sections 156-157 exempt offices whose exercise rests on public election. Section 19 makes negligence punishable under the Criminal Code where specifically provided for. [37]

Article 19 UNCAC requires States to consider criminalising intentional abuse of functions contrary to law for the purpose of obtaining an undue advantage for oneself, others or an entity. It is not an independent basis for criminal liability in Danish law. [38]

Finding and responsibility: A sanction against a person requires specific attribution of the task, act, knowledge, culpability and the other statutory elements. The report identifies institutional breaches of duty and a Danish Convention violation. It does not replace this with an undocumented assertion that everyone involved has committed the same offence.

8 Documented incidence of error and independent scrutiny

8.1 The documented incidence of error makes scrutiny necessary

Ankestyrelsen's own annual reports show 45,022 appeal outcomes involving amendment, annulment or remittal among 150,345 municipal social and employment appeals decided on the merits in 2018-2024. The total is calculated from the original tables, counting each decision year once. These are outcome registrations, not unique individuals or 45,022 independently proved breaches of law. Rejected and discontinued cases are excluded from the denominator; municipal decisions not appealed are excluded from the appeal series. The series is not a complete 20-year annual series. [39] [40] [41]

Source and location: Annual report 2020, Table 4.2, p. 38; annual report 2021, Table 4.2, p. 35; annual report 2024, Table 4.3, p. 26. The calculation and choice between source versions are set out in section 11.2.

The specific allegation of inadequate scrutiny rests on the original sources in Chapters 3-6. Correction and remittal figures do not establish that a particular new item of information is false. They make it untenable to treat institutional status as a substitute for specific scrutiny.

8.2 The chain of oversight must examine its own basis

The documented cases in Chapters 3-6 show different links in a chain of oversight. Our cross-cutting analysis is that a later authority's endorsement adds no independent documentation if it rests solely on the same material.

The investigative principle keeps responsibility with the deciding authority. Information from others may be used, but relevant doubt must be resolved and the necessary basis must be in place. [17]

Finding: The decisive dividing line is between adopting a statement and examining it. We demand scrutiny that shows the connection from the original information, through the counterevidence, to the authority's own conclusion. Repetition and institutional endorsement cannot perform this work.

9 Responsibility, redress and specific demands

9.1 Responsibility attaches to each decision-making stage

The authority that first records information is responsible for that information and its basis. The receiving authority is responsible for how the information is investigated and used. The appeal body is responsible for its own review and reasons. The courts must meet the procedural and human rights requirements governing their review. Responsibility cannot be reduced to a single error in the first note if later bodies have been given a specific reason to investigate it and fail to do so.

This is also a management responsibility for the design of oversight. A system that receives objections without providing scope for their examination cannot be assessed solely by whether replies are sent. It must be assessed by whether decisive errors can be found, corrected and stopped before they cause further consequences.

9.2 The strongest sustainable arguments

1. **The source's status cannot replace examination of the evidence.** Where status is used as a filter, the specific method must be challenged and the relevant evidence brought into the case.
2. **The oversight authority has its own responsibility.** Another authority's account does not relieve the recipient of the duty to resolve significant, specific doubt.
3. **Counterevidence must be investigated and answered.** The objection must be connected to the decisive fact to be proved, and the reasons must show why the selected premise holds.
4. **The seriousness of the interference determines the requirements of review.** Physical integrity, family life and fundamental rights require the specific protection imposed by the relevant rule and case law.
5. **Correction must take effect throughout the chain.** Rectification, notification of relevant recipients and reopening must be used in accordance with their conditions, so that the same error does not support a new decision.

The arguments rest on the precise standards and original cases in Chapters 3-6. They require no undocumented claim that an entire group of employees is lying, and no common theory about the individual actors' intentions.

9.3 Projekt Paulus' demands

1. **Show the origin of the information.** Decisive facts must be capable of being linked to the contemporaneous original source. An account, an observation and a professional assessment must appear as different types of information.
2. **Secure the evidence in time.** Video, audio, original statements and relevant record entries must be preserved where a dispute makes them necessary for review.
3. **Investigate specific contradictions.** The oversight body must obtain the necessary underlying material and explain its choice between contradictory accounts.
4. **Give the individual's evidence effective access.** Relevant witnesses and documents must not be excluded solely because they lack official affiliation.
5. **Make oversight independent.** The authority under scrutiny must be open to contradiction by the material that the oversight body itself obtains and examines.
6. **Document compliance.** A plan, statement or new guideline must be described as precisely that. An actual end to breaches of law and specific redress must be documented separately.
7. **Correct the consequences.** Where errors are documented, the authority must consider rectification, recipients, reopening and other relevant legal consequences on the specific basis of the case.
8. **Identify responsibility.** It must be clear who made the adverse decision, who received the counterevidence, and who had the duty and opportunity to respond.

The demands bring together the report's legal and institutional consequences. They are not claims that every rule applies identically to all types of case.

10 Overall conclusion

The documented failure is that, in several instances, official authority has taken over the work of evidence. This occurs when the official source is used to exclude information, when an account is perpetuated without necessary verification, and when another body's assessment takes the place of independent reasons.

The chain of oversight can thereby make weak information stronger in practice without making it better substantiated. The individual encounters several authorities pointing back to each other. The error acquires more sources repeating it and a longer history. It becomes harder to remove precisely because it has already been used.

This is a failing oversight function. It cannot be justified by the duty that the first authority was supposed to have fulfilled. If the duty of truthfulness were itself sufficient scrutiny, verification of information from authorities would lose its purpose.

The legal requirements are clear: adequate investigation of the case, specific consideration of significant doubt, access to relevant evidence, and reasons that can be reviewed. Human rights law additionally requires the effective and independent protection made necessary by the right affected. Agreement between public institutions does not establish that these requirements have been met.

The corruption analysis shows the seriousness of dependence in oversight. An arrangement that in practice protects the supervised system's narrative from necessary scrutiny risks displacing the purpose of oversight. It must be examined and assessed as an integrity risk even without a financial exchange. Any further classification and any individual criminal liability must rest on their own evidence.

Projekt Paulus' overall allegation is therefore this: in the documented cases, public institutions failed to carry out the independent scrutiny that should have protected the individual against an incorrect or inadequate basis for decision-making. The authority of oversight was invoked without the work of oversight being performed adequately.

Our demand is that official information must be capable of verification where it produces legal effects. An error must be stopped throughout the chain. The individual must be able to have the basis and its consequences corrected. That is the task of oversight, and it is the responsibility to which authorities must be held.

11 Sources and chains of evidence

11.1 Documented errors and the evidential value of the sources

The report covers Danish circumstances and oversight processes in 2006-2026, with a research cut-off of 17 November 2026. Earlier events are included only as necessary background to an oversight process within the period. FOB 1993.119, *Chevrol* and *Kudła* are expressly historical sources of legal standards. Judgments concerning other countries are used as human rights case law and are not counted as Danish instances.

The specific factual claims rest on published original judgments, the Ombudsman's opinions, Rigsrevisionen's report and follow-up, and the authorities' own documents. The appearance of a statement in an official source does not automatically make it true. An opinion is used as a primary source for what the Ombudsman investigated, reproduced and criticised; a judgment is used for its reasoning and outcome. Underlying letters made public only through an opinion's account are attributed to that account.

Decisive claim	Source chain	Documented significance
Municipal statements were inadequately verified	Supervisory material → Rigsrevisionen's investigation → Chapter 3	Established deficiency in oversight and defined follow-up
Official affiliation became an evidential filter	Ankestyrelsen's reasons reproduced in FOB 2018-31 → section 4.1	Rejected method of collecting evidence
A municipal account was not checked with the expert source	Telephone note and appeal handling reproduced in FOB 2017-17 → section 4.2	Inadequate basis and recommendation to reopen
Contradictory information and original evidence were handled inadequately	Material and the Directorate's statements in FOB 2016-52 → section 4.3	Criticised investigation, not established violence
A police account supported an inadequately investigated basis for an employment decision	Police material and municipal handling reproduced in FOB 2009 20-6 → section 4.4	Criticism and cessation of the trust criterion
Endorsement replaced visible reasons	The consultant physician's and Ankestyrelsen's reasons in FOB 2012-17 → section 4.5	Criticism of the reasons; the refusal itself not overturned
National levels of oversight failed to address decisive matters	Danish medical records and judgments reproduced and examined in Aggerholm → section 6.1	Established violation of Article 3

The precise pages, dates, case numbers and direct links appear alongside the discussion and in the numbered source references. Repeated references to the same work are not independent evidence. Projekt Paulus' cross-cutting analyses and demands are our own conclusions on the identified basis.

11.2 Verifiable calculation from the original tables

The total in section 8.1 is based on Ankestyrelsen's published outcome tables. Each decision year is included once:

Decision year	Direct original source and location	Use
2018	Annual report 2020, Table 4.2, p. 38. [39]	8,176 amended, annulled or remitted; 26,820 decided on the merits
2019-2021	Annual report 2021, Table 4.2, p. 35. [40]	20,195 amended, annulled or remitted; 68,634 decided on the merits
2022-2024	Annual report 2024, Table 4.3, p. 26. [41]	16,651 amended, annulled or remitted; 54,891 decided on the merits
Total 2018-2024	Our own summation of the three original tables	45,022 amended, annulled or remitted; 150,345 decided on the merits

For 2020, the later annual report 2021 is used: 23,596 cases decided on the merits rather than 23,594 in the earlier version. The number of amendments, annulments or remittals is unchanged at 6,904. The annual report 2024 uses the data extraction of 11 April 2025 and notes that registrations are updated on an ongoing basis. The calculation is tied to these source versions; the years have not been added across overlapping tables.

11.3 Statutory versions and quotation policy

Statutory references are tied to the identified consolidated acts. Earlier cases are described using the criticism and application of legal standards appearing in the relevant opinion or judgment. The present-day overview of legal standards is not a retroactive criminal-law assessment of historical acts.

Sections 19 and 155-157 of the Danish Criminal Code have been checked in Consolidated Act 1294/2025 and against the amending sections of Acts 263/2026, 358/2026, 764/2026 and 766/2026. These do not amend the provisions mentioned. [42] [43] [44] [45]

Sections 19, 21, 22 and 24 of the Danish Public Administration Act have been checked in Consolidated Act 433/2014 and against section 2 of Act 503/2018 and section 2 of Act 655/2024. Sections 298-300 and 344 of the Danish Administration of Justice Act have been checked in Consolidated Act 1298/2025 and against section 1 of Act 1765/2025, section 2 of Act 263/2026 and section 19 of Act 764/2026. The subsequent amendments do not amend the provisions applied. Retsinformation's status cover pages of 17 November 2026 mark both consolidated acts as in force. [46] [47] [48] [49] [50]

Direct quotations retain the source wording in the Danish report. In this English edition, quotations from Danish sources are faithfully translated into English; they are translations, not original English wording. The quotation from the ECtHR's English-language judgment remains in its original English. Translated or summarised descriptions outside quotation blocks are presented as reported accounts. Archived originals, source logs, reading scopes and working material are collected in the subfolder *følgelighed*. They form the documentary basis of the completed report.

12 References

The numbers refer to the sources cited alongside the specific statements and findings. Source titles are clickable. Precise pages and sections are given in the references below or alongside the discussion of the case. Original bibliographic titles are retained in their source language.

[1] Lovtidende A / Retsinformation; Socialmin., file no. 2023-5627, Bekendtgørelse af lov om retssikkerhed og administration på det sociale område, 2026-08-03
https://www.retsinformation.dk/eli/lta/2026/680/pdf

[2] Børne- og Socialministeriet; now Social- og Boligministeriet, Vejledning om retssikkerhed og administration på det sociale område, 2019-03-21
https://www.retsinformation.dk/eli/retsinfo/2019/9330/pdf

[3] Justitsministeriet, Bekendtgørelse af forvaltningsloven, 2014-04-22
https://www.retsinformation.dk/eli/lta/2014/433/pdf

[4] Højesteret, A mod Region Sjælland, BS-38653/2025-HJR, 2026-05-28
https://domstoldk.euwest01.umbraco.io/media/1atn2srz/38653-2025.pdf

[5] Rigsrevisionen, Ankestyrelsens tilsyn og brug af reaktioner ved lovbrud, Report 18/2024, June 2025; audit signature 21 May 2025
https://www.ft.dk/statsrevisor/20241/beretning/sb18/bilag/1/3032560/index.htm

[6] Ankestyrelsen; Cathrine Due Billing, Ankestyrelsens bidrag til ministerredegørelse til beretning nr. 18/2024, 19 August 2025
https://www.ft.dk/samling/20241/almdel/sou/bilag/448/3063405.pdf

[7] Rigsrevisionen; Birgitte Hansen, Notat om beretning 18/2024; RN C116/25, 10 October 2025; cover states November 2025
https://www.rigsrevisionen.dk/Media/638965751479211559/C116-25.pdf

[8] Rigsrevisionen, Socialministeriet - oversigt over åbne beretningssager, status observed 17 November 2026
https://www.rigsrevisionen.dk/sager-vi-foelger/socialministeriet

[9] Økonomi- og Indenrigsministeriet, Udkast til lov om ændring af lov om kommunernes styrelse, regionsloven og om ophævelse af lov om frikommunenetværk (Et mere ensartet og håndfast tilsyn med kommuner og regioner), consultation 14 September 2026
https://prodstoragehoeringspo.blob.core.windows.net/5f35455e-267b-4ff9-88c3-5a21c9754d20/Lovforslag.pdf

[10] Ministry of Foreign Affairs, Anders Samuelsen, REU 2017-18, final answer to question 982, 1 August 2018, pp. 1-4
https://www.ft.dk/samling/20171/almdel/reu/spm/982/svar/1504446/1926268.pdf

[11] Ministry for Economic Affairs and the Interior, speaking notes submitted as SOU 2026-27, answer to question 127, November 2026, pp. 3 and 6-13
https://www.ft.dk/samling/20261/almdel/sou/spm/127/svar/2251091/3219815.pdf

[12] Folketingets Ombudsmand, FOB2018-31 Kontanthjælp eller integrationsydelse til hjemløs. Dokumentation af opholdssted. Vejledning, 2018-10-29
https://cdn.ombudsmanden.dk/ombudsmanden/media/53376/pdf1.pdf

[13] Folketingets Ombudsmand, FOB2017-17: Tvivl om oplysningsgrundlaget ved afslag på arbejdsredskab, 7 July 2017
https://www.retsinformation.dk/api/pdf/192602

[14] Folketingets Ombudsmand, FOB2016-52 Magtanvendelse i en arrest utilstrækkeligt undersøgt, 2016-12-08
https://cdn2.gopublic.dk/ombudsmanden/media/52486/pdf.pdf

[15] Folketingets Ombudsmand, FOB2009 20-6: Afskedigelse og blacklisting på grund af tidligere sigtelse som politiet havde opgivet med henvisning til bevisets stilling, 5 October 2009
https://cdn.ombudsmanden.dk/ombudsmanden/media/52315/200920-6..pdf

[16] Folketingets Ombudsmand, FOB2012-17 Afslag på behandling med kunstig befrugtning til handicappet par. Begrundelse, 2012-10-22
https://cdn2.gopublic.dk/ombudsmanden/media/53598/pdf.pdf

[17] Folketingets Ombudsmand, Myndighedsguiden #8 Officialprincippet, case-law search 2026-08-18
https://www.ombudsmanden.dk/find-viden/myndighedsguiden/generel-forvaltningsret/8-officialprincippet

[18] Folketingets Ombudsmand, FOB1993.119 Grundlaget for Indenrigsministeriets udtalelse i en sag om en amtskommunes afslag på at samarbejde med et privathospital, 1993
https://www.ombudsmanden.dk/find-viden/udtalelser/1993/93119

[19] Folketingets Ombudsmand, Myndighedsguiden #10 Begrundelse, 2024-03-27
https://www.ombudsmanden.dk/find-viden/myndighedsguiden/generel-forvaltningsret/10-begrundelse

[20] Justitsministeriet, Bekendtgørelse af lov om rettens pleje, 2025-11-07
https://www.retsinformation.dk/eli/lta/2025/1298/pdf

[21] Folketingets Ombudsmand, FOB2013-7 Vejledning om mulighederne for genoptagelse efter såvel lovbestemte som ulovbestemte regler, 2013-04-10
https://cdn.ombudsmanden.dk/ombudsmanden/media/53581/pdf.pdf

[22] Folketingets Ombudsmand, Myndighedsguiden #25 Pligten til genoptagelse ved praksisændring på grund af fejl, 2023-09-27
https://www.ombudsmanden.dk/find-viden/myndighedsguiden/generel-forvaltningsret/25-pligten-til-genoptagelse-ved-praksisaendring-paa-grund-af-fejl

[23] Europa-Parlamentet og Rådet / EUR-Lex, Forordning(EU)2016/679; Danish consolidated text 02016R0679-20160504-000.002, 2016-04-27
https://eur-lex.europa.eu/legal-content/DA/TXT/PDF/?uri=CELEX%3A02016R0679-20160504

[24] Datatilsynet, Vejledning om de registreredes rettigheder, 2018-07
https://www.datatilsynet.dk/Media/C/0/Registreredes%20rettigheder.pdf

[25] ECtHR, Aggerholm v. Denmark, 2020-09-15
https://hudoc.echr.coe.int/eng?i=001-204602

[26] ECtHR, Korošec v. Slovenia, 2015-10-08
https://hudoc.echr.coe.int/eng?i=001-157538

[27] ECtHR, Ramos Nunes de Carvalho e Sá v. Portugal (Grand Chamber), 2018-11-06
https://hudoc.echr.coe.int/eng?i=001-187507

[28] ECtHR, Strand Lobben and Others v. Norway (Grand Chamber), 2019-09-10
https://hudoc.echr.coe.int/eng?i=001-195909

[29] ECtHR, Chevrol v. France, 2003-02-13
https://hudoc.echr.coe.int/eng?i=001-60941

[30] ECtHR, Ramsahai and Others v. the Netherlands (Grand Chamber), 2007-05-15
https://hudoc.echr.coe.int/eng?i=001-80563

[31] ECtHR, Kudła v. Poland (Grand Chamber), 2000-10-26
https://hudoc.echr.coe.int/eng?i=001-58920

[32] Charter of Fundamental Rights of the European Union (2012/C 326/02), Danish original, 2012-10-26
https://eur-lex.europa.eu/legal-content/DA/TXT/?uri=CELEX:12012P/TXT

[33] Lawrence Lessig, "Institutional Corruption" Defined, Journal of Law, Medicine & Ethics 41(3), 2013, pp. 553-555, DOI10.1111/jlme.12063
https://www.cambridge.org/core/services/aop-cambridge-core/content/view/6F91C6EF8CBD0CC7A7A7D7DB3DB75643/S1073110500250 2Xa.pdf/institutional_corruption_defined.pdf

[34] Dennis F. Thompson, Two Concepts of Corruption, Edmond J. Safra Working Papers 16, 1 August 2013, pp. 4-5 and 8, particularly note 9; DOI10.2139/ssrn.2304419
https://dft.scholars.harvard.edu/publications/two-concepts-corruption-individual-and-institutional

[35] OECD, Public Integrity Handbook, 20 May 2020, Chapter 12, printed pp. 193-198/PDF pp. 195-200; DOI10.1787/ac8ed8e8-en
https://www.oecd.org/content/dam/oecd/en/publications/reports/2020/05/oecd-public-integrity-handbook_598692a5/ac8ed8e8-en.pdf

[36] Public Prosecution Service of Canada, Innocence at Stake, Chapter 2: Understanding Tunnel Vision, section III(c): Noble Cause Corruption, Trauma and Tunnel Vision; modified 25 April 2019
https://www.ppsc-sppc.gc.ca/eng/pub/is-ip/ch2.html?wbdisable=true

[37] Justitsministeriet, Straffeloven, Consolidated Act 1294 of 7 November 2025, sections 19 and 155-157; public-service provisions, PDF p. 29
https://www.retsinformation.dk/eli/lta/2025/1294/pdf

[38] UN, United Nations Convention against Corruption, 2003, Article 19, PDF p. 16
https://treaties.un.org/doc/source/recenttexts/corruption_e.pdf

[39] Ankestyrelsen, Ankestyrelsens årsredegørelse til Det Rådgivende Praksisudvalg 2020, May 2021, Table 4.2, p. 38
https://cdn.ast.dk/ankestyrelsen/Media/638732327378275946/Ankestyrelsens-%C3%A5rsredeg%C3%B8relse-til-det-r%C3%A5dgivende-praksisudvalg-for-2020.pdf

[40] Ankestyrelsen, Ankestyrelsens årsredegørelse til Det Rådgivende Praksisudvalg 2021, May 2022, Table 4.2, p. 35
https://cdn.ast.dk/ankestyrelsen/Media/638732364740555553/Ankestyrelsens-%C3%A5rsredeg%C3%B8relse-til-Det-R%C3%A5dgivende-Praksisudvalg-2021.pdf

[41] Ankestyrelsen, Ankestyrelsens årsredegørelse til Det Rådgivende Praksisudvalg 2024, August 2025, Table 4.3, p. 26
https://cdn.ast.dk/ankestyrelsen/Media/638917875859340782/ankestyrelsens-arsredegorelse-til-det-radgivende-praksisudvalg-2024.pdf

[42] Justitsministeriet, Act no. 263 of 11 February 2026, sections amending the Danish Criminal Code
https://www.retsinformation.dk/eli/lta/2026/263/pdf

[43] Justitsministeriet, Act no. 358 of 3 March 2026, sections amending the Danish Criminal Code
https://www.retsinformation.dk/eli/lta/2026/358/pdf

[44] Justitsministeriet, Act no. 764 of 8 September 2026, sections amending the Danish Criminal Code
https://www.retsinformation.dk/eli/lta/2026/764/pdf

[45] Justitsministeriet, Act no. 766 of 8 September 2026, sections amending the Danish Criminal Code
https://www.retsinformation.dk/eli/lta/2026/766/pdf

[46] Act no. 503 of 23 May 2018, section 2
https://www.retsinformation.dk/eli/lta/2018/503/pdf

[47] Act no. 655 of 11 June 2024, section 2
https://www.retsinformation.dk/eli/lta/2024/655/pdf

[48] Act no. 1765 of 29 December 2025, section 1
https://www.retsinformation.dk/eli/lta/2025/1765/pdf

[49] Retsinformation status cover page for forvaltningsloven, checked 17 November 2026
https://www.retsinformation.dk/api/pdf/161411

[50] Retsinformation status cover page for retsplejeloven, checked 17 November 2026
https://www.retsinformation.dk/api/pdf/251974