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**Confidential**  
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# FIFTH EVALUATION ROUND

Preventing corruption and promoting integrity in  
central governments (top executive functions) and  
law enforcement agencies

## SECOND COMPLIANCE REPORT

# DENMARK



Adopted by GRECO  
at its 95<sup>th</sup> Plenary Meeting (Strasbourg, 27 November-1 December 2023)



Group of States against Corruption  
Groupe d'États contre la corruption

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

## **I. INTRODUCTION**

1. GRECO's Fifth Evaluation Round deals with "Preventing corruption and promoting integrity in central governments (persons entrusted with top executive functions, PTEF) and law enforcement agencies (LEA)".
2. This Second Compliance Report assesses the measures taken by the authorities of Denmark to implement the recommendations issued in the Fifth Round Evaluation Report on Denmark which was adopted at GRECO's 83<sup>rd</sup> Plenary Meeting (17-21 June 2019) and made public on 4 September 2019, following authorisation by Denmark. The Fifth Round Compliance Report on Denmark was adopted by GRECO at its 88<sup>th</sup> Plenary Meeting (22 September 2021) and made public on 17 December 2021, following authorisation by Denmark. GRECO noted that further progress was necessary to demonstrate an acceptable level of compliance with the recommendations and asked the Head of Delegation of Denmark to provide a report on the progress in implementing the recommendations.
3. As required by GRECO's Rules of Procedure<sup>1</sup>, the authorities of Denmark submitted a Situation Report on measures taken to implement the recommendations. This report was received on 20 April 2023 and served as a basis for this Second Compliance Report.
4. GRECO selected the Slovak Republic (with respect to top executive functions in central governments) and Iceland (with respect to law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed were Ms Radka MONCOLOVÁ, on behalf of the Slovak Republic, and Ms Ásthildur VALTÝSDÓTTIR, on behalf of Iceland. They were assisted by GRECO's Secretariat in drawing up the Second Compliance Report.

## **II. ANALYSIS**

5. GRECO addressed 14 recommendations to Denmark in its Evaluation Report. In the Compliance Report, GRECO concluded that recommendations ix and x had been dealt with in a satisfactory manner, recommendation iii had been partly implemented and recommendations i, ii, iv, v, vi, vii, viii, xi, xii, xiii and xiv had not been implemented. Compliance with the 12 outstanding recommendations is dealt with below.

*Preventing corruption and promoting integrity in central governments (top executive functions)*

### **Recommendation i**

6. *GRECO recommended that an analysis of integrity-related risks involving members of the government and special advisers be carried out and that on this basis a strategy for the integrity of persons with top executive functions be developed and implemented.*

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<sup>1</sup> The Compliance procedure of GRECO's Fifth Evaluation Round is governed by its Rules of Procedure, as amended: Rule 31 revised bis and Rule 32 revised.

7. GRECO recalls that recommendation i had not been implemented in the Compliance Report, as no analysis of integrity-related risks involving members of the government had been carried out as a basis of a future strategy on these matters. The authorities had referred to the existence of rules and guidelines on integrity-related matters applying to ministers and special advisers. However, these measures had already been assessed in the Evaluation Report and did not correspond to the expectations of a more holistic approach underlying the recommendation.
8. The Danish authorities report that there are still no immediate plans to develop and implement a strategy for the integrity of members of the government. It makes reference to the information already submitted in the Compliance Report regarding measures taken to implement the outstanding recommendations. When it comes to special advisers, the Danish authorities reiterate that several inquiries have already been carried out, and that lack of compliance with the rules on conflicts of interest, confidentiality or gifts by ministers and advisers can entail a violation of the Criminal Code and can therefore lead to sanctions.
9. GRECO notes that the information provided does not highlight any new measure having been taken to implement the recommendation. The authorities reiterate that rules and guidelines exist, the violation of which can lead to sanctions. Several inquiries were carried out in respect of advisers which led to further awareness activities. Against this background, the authorities have no plans to carry out an analysis of integrity-related risks for persons with top executive functions (hereafter: PTEFs). GRECO stresses again that the Evaluation Report highlighted the need for a greater sensitivity to certain integrity risks and for more importance to be attached to promoting integrity among PTEFs.
10. GRECO concludes that recommendation i remains not implemented.

#### **Recommendation ii**

11. *GRECO recommended (i) that a code of conduct for persons with top executive functions be adopted, complemented with appropriate guidance regarding conflicts of interest and other integrity-related matters (e.g. gifts, outside activities, third party contacts, handling of confidential information etc.) and (ii) that such a code be coupled with a mechanism of supervision and enforcement.*
12. GRECO recalls that recommendation ii had not been implemented in the Compliance Report. As regards the first part of the recommendation, the authorities had made reference to a ministerial handbook received by all new ministers, which is updated regularly and contains relevant regulations regarding governmental work, including all applicable rules and guidelines on integrity-related matters. A memorandum on conflicts of interest had been added following the June 2019 general election. The authorities acknowledged that the handbook does not contain any rules on lobbyists or employment following termination of their ministerial position, as Denmark does not have such rules. Ministerial advisers were reported to be fully covered by the Code of

Conduct for the Public Sector. GRECO had pointed out that these instruments had already been assessed in the Evaluation Report, except the new memorandum on conflicts of interest. It had highlighted in that report the benefit of establishing a code of conduct for members of the government consolidating the rules on integrity and providing additional guidance, as a complement to the handbook. The additional memorandum for the most part reiterates existing provisions of the Public Administration Act, without providing much further guidance, as advocated for in the Evaluation Report.

13. Regarding the second part of the recommendation, the authorities had pointed out that lack of compliance with the rules on conflicts of interest, confidentiality and gifts could entail a violation of the Criminal Code. For special advisers, the Code of Conduct for the Public Sector outlines that sanctions in the form of a warning, a reprimand or dismissal can be imposed for violations of its provisions. In turn, for ministers, a violation of the rules can in some cases be sanctioned in accordance with section 5 of the Ministerial Accountability Act. GRECO had stressed the added value of a non-criminal enforcement mechanism to be foreseen in a code of conduct for PTEFs, which could cover all integrity-related misconduct that did not rise to the level of a crime, providing for additional proportionality to the accountability of ministers who have little or none for official misconduct other than political oversight. Finally, as regards special advisers, while in the Evaluation Report GRECO considered the Code of Conduct for the Public Sector a comprehensive document which provided clear guidance, it also concluded that it would not in all situations be pertinent for special advisers (*inter alia* given the political neutrality expected of civil servants and the differences in status and recruitment between civil servants and special advisers). It was therefore considered more appropriate to have special advisers covered by a special code of conduct for PTEFs.
14. The Danish authorities reiterate the information already provided in the Compliance Report as regards both parts of the recommendation. While they acknowledge that the ministerial handbook does not provide any guidance regarding contacts with lobbyists or employment following termination, they are of the view that it does provide adequate guidance on confidentiality, conflicts of interest, bribery and the acceptance of gifts. In case of violation by ministers of integrity rules, they may be dismissed by the Prime Minister or subject to a vote of no-confidence by Parliament. Therefore, Denmark has no current plans to take further measures to implement the recommendation as regards ministers. As regards special advisers, the authorities reiterate their position that a code of conduct complemented with appropriate guidance and coupled with a mechanism of supervision and sanctions already exists.
15. GRECO takes note of the information provided, which does not bring any new elements or tangible measures to implement either part of the recommendation. GRECO cannot but conclude that both parts of the recommendation remain unimplemented.
16. GRECO concludes that recommendation ii remains not implemented.

### **Recommendation iii**

17. *GRECO recommended that i) systematic briefing on integrity issues be imparted to members of the government upon taking up their positions and at certain intervals thereafter and ii) confidential counselling on integrity issues be established for them.*
18. It is recalled that this recommendation had been partly implemented. GRECO had noted, as regards the first part, that briefings on integrity issues had been imparted to members of the government upon taking up their position in recent governments. This was highlighted as a good practice. However, for this part of the recommendation to be fully implemented these briefings would need to be repeated at certain intervals thereafter (notwithstanding the fact that ministers can always contact the Prime-Minister's Office at their own initiative). This part of the recommendation was therefore partly implemented. As regards the second part of the recommendation, GRECO had noted that ministers are reportedly counselled on a daily basis by their permanent secretary, their secretariat and Law Divisions. However, in the Evaluation Report, it had found that these channels to communicate on possible ethical dilemmas should be "more clearly defined, harmonising practices and consolidating institutional memory". As this had not been done, it had assessed this part of the recommendation as not implemented.
19. The Danish authorities again report no new information. In Denmark's experience, all integrity-related rules and guidelines are in general adhered to and that the existing channels for advice and briefings are sufficient to ensure compliance. Denmark has thus no current plans to take further steps to implement the recommendation.
20. GRECO takes note of the absence of new measures taken to give effect to this recommendation.
21. GRECO concludes that recommendation iii remains partly implemented.

### **Recommendation iv**

22. *GRECO recommended that, in order to improve public access to information under the Access to Public Administration Files Act, the scope of the exceptions under the Act be restricted or further measures be taken to ensure that the exceptions under the act are applied less frequently in practice.*
23. GRECO recalls that this recommendation had not been implemented. The Danish authorities had stated in April 2021 an intention to revise the Access to Public Administration Files Act. Negotiations were on-going to see if a political agreement could be reached on restricting the use of certain exceptions under the act. GRECO welcomed this stated intention, but the process was at too early a stage to warrant even a partial implementation of the recommendation.
24. The Danish authorities now indicate that in December 2022, the government announced that it wishes to establish an expert committee to prepare proposals for a new Access to Public Administration Files Act in order to give the public better opportunities for

insight into political decision-making processes. Political negotiations on the establishment of the committee are ongoing.

25. GRECO welcomes the announced establishment of an expert committee to prepare proposals for a new Access to Public Administration Files Act. However, again this process is still at a very early stage. In the absence of other measures reported to ensure that the exceptions under the current act are applied less frequently in practice, GRECO can only conclude that the recommendation remains not implemented.
26. GRECO concludes that recommendation iv remains not implemented.

#### **Recommendation v**

27. *GRECO recommended i) introducing rules and guidance on how persons entrusted with top executive functions engage in contacts with lobbyists and other third parties seeking to influence governmental processes and decisions; and (ii) increasing the transparency of contacts and subject matters concerning lobbying of persons entrusted with top executive functions.*
28. It is recalled that this recommendation had been assessed as not implemented in the Compliance Report. The Danish authorities had acknowledged that there were no rules or guidance in place regarding contacts with lobbyists and other third parties seeking to influence governmental processes and decisions. However, the general rules on confidentiality, conflicts of interest, bribery and rules regarding acceptance of gifts apply, including, for special advisers, the Code of Conduct for the Public Sector. GRECO recalled that it had found in the Evaluation Report that these general rules did not provide sufficient transparency in respect of the impact of lobbyists and other third parties (including special interest groups) on government policies and considered it crucially important to address this issue to uphold public trust in democratic decision-making processes.
29. The Danish authorities explain that according to a political agreement on a transparency scheme for ministers' expenses and activities, ministers' participation in official representative events, representative expense and gifts received must be declared monthly, as foreseen in chapter 13 of the ministerial handbook. They also point out that as part of the legislative process, the comments submitted by interest groups on draft legislation are usually published by the Parliament. The authorities refer again to the rules on conflicts of interest contained in the Code of Conduct for the Public Sector and the Public Administration Act. In cases where these provisions do not apply, they are supplemented by the general fundamental legal principle of impartiality. There are no current plans to introduce any more specific rules regarding contacts with lobbyists.
30. GRECO notes that the rules referred to by the authorities on the monthly report of official events attended by ministers, as well as their representative expenses and gifts received are of little use in shedding more transparency on meetings of PTEFs with lobbyists and on subject matters discussed in such meetings. The same can be said of the publication of comments submitted by third parties on draft legislation. Moreover, such publication occurs at the stage draft laws are considered by Parliament, later than

any discussions that may occur at the pre-parliamentary stage of preparations of the draft laws. As regards the reference to the Code of Conduct for the Public Sector, the Public Administration Act and the legal principle of impartiality, GRECO has already stated in the previous reports that these were too general to offer proper guidance to PTEFs on their contacts with lobbyists and other third parties. It cannot but regret that the authorities have no plans to remedy this gap.

31. GRECO concludes that recommendation v remains not implemented.

#### **Recommendation vi**

32. *GRECO recommended introducing rules to deal with the employment of persons entrusted with top executive functions following the termination of their service in the public sector.*
33. GRECO recalls that this recommendation was not implemented in the previous report. Reference had been made to 2016 discussions in Parliament to prepare models for rules regarding revolving doors, but these had not come to fruition and there were no plans at the time of that report to introduce any rules in this area.
34. The authorities report that there are still no plans to introduce specific rules regarding revolving doors. Violation of the duty of confidentiality and bribery are sanctioned under the Criminal Code, which ensures the safeguarding of confidential information when moving from the public to the private sector.
35. GRECO takes note of the absence of new information or measures to give effect to this recommendation. It already stressed in the Compliance Report that it would be rare for moves from the public to the private sector to rise to the level of crime.
36. GRECO concludes that recommendation vi remains not implemented.

#### **Recommendation vii**

37. *GRECO recommended (i) enshrining in regulation or legislation an obligation for members of the government to publicly declare their assets, income and financial interests; (ii) that quantitative data on income as well as data on assets and significant liabilities is included in the financial declarations; and (iii) that it be considered to oblige special advisers to declare their financial interests publicly on a regular basis as well.*
38. It is recalled that this recommendation was assessed as not implemented, in the absence of any measure taken to give effect to it.
39. The Danish authorities refer, as they did in the Evaluation Report and the Compliance Report, to a system in place since 2005, by which all ministers have been required to file their financial interests on the basis of a standard, which is published. Even if the scheme is not based on legislation, successive governments have complied with this regime as a mandatory measure. Thus, Denmark does not find it necessary to take further measures

to implement these two parts of the recommendation as regards members of the government.

40. As regards the third part of the recommendation, the authorities emphasise that special advisers have a duty to report potential conflicts of interest to the permanent secretary of their ministry or their manager. Therefore, it is not considered necessary to introduce new rules regarding special advisers' financial interests.
41. GRECO takes note of the information provided, which merely reiterates that already submitted in the previous reports. It is clear that no measures have been taken to implement this recommendation, not even to give due consideration to obliging special advisers to declare their financial interests on a regular basis.<sup>2</sup>
42. GRECO concludes that recommendation vii remains not implemented.

### **Recommendation viii**

43. *GRECO recommended that declarations submitted by persons entrusted with top executive functions be subject to substantive control.*
44. GRECO recalls that this recommendation was not implemented in the Compliance Report. The authorities had stated that even though there is no formal review mechanism regarding the accuracy of information provided by ministers, the declarations are published on the website of the Prime Minister's Office. Consequently, this information (and any inaccuracies therein) will be subject to scrutiny by Parliament, the press and the public at large, and ministers bear political responsibility for this information. They could be dismissed by the Prime Minister or subject to a vote of no-confidence by Parliament. In view of the fact that in Denmark's experience, the rules are in general adhered to, the authorities did not find it necessary to take further measures to implement the recommendation as regards ministers.
45. The Danish authorities provide no new information as regards this recommendation and reiterate that, as the rules regarding declarations by ministers are generally adhered to, Denmark does not find it necessary to introduce specific review mechanisms regarding financial declarations.
46. GRECO can only regret that the Danish authorities have not found it necessary to ensure that financial declarations by ministers are subject to substantive control.
47. GRECO concludes that recommendation viii remains not implemented.

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<sup>2</sup> GRECO recalls that Bureau 75 established four criteria to be fulfilled to conclude that a "consider-recommendation" has been implemented, namely 1) pertinence (Has the reflection process carried out in the country concerned really taken into account GRECO's underlying concerns?); 2) extent (Were these concerns examined/discussed in depth, possibly with the involvement of appropriate (expert) institutions/individuals?); 3) legitimacy (Has the decision to act/not to act been taken by an appropriate authority, ideally at political level?); 4) documentation (Has the reflection process and/or its results been properly documented?).



*Regarding law enforcement agencies*

**Recommendation xi**

48. *GRECO recommended developing a streamlined system for authorisation of secondary activities within the police, which is coupled with effective follow-up.*
49. GRECO recalls that this recommendation was not implemented in the Compliance Report. The authorities had explained that a generalised system of reporting secondary activities would be incompatible with the Civil Servants Act, which does not provide for a system for employees to report their secondary activities. Employees are already nevertheless already obligated to provide information to their managers on their secondary activities, if so requested, and, if in doubt whether the secondary employment is compatible with employment within the police, must report their secondary employment. Employees with the security level “secret” or “top secret” are always required to report their intention to take up secondary activities. The authorities stressed that it is the experience of the Danish National Police that secondary activities in the vast majority of cases are unproblematic and that staff members of the police have a great understanding of when a secondary activity is incompatible with their profession. If in doubt, employees ask their managers for advice.
50. The Danish authorities report again that it is the opinion of the National Police that employment in the police is characterised by a need to report secondary employment only with a view to a concrete assessment of any potential conflicts of interest. A reporting duty applies to employees with the security level “secret” or “top secret”. Other employees must report secondary employment if in doubt about its compatibility with their police duties. The National Police finds the current reporting system suitable to filter those secondary activities that adversely impact the exercise of the staff member’s functions or could entail a real, potential or perceived conflict of interest.
51. GRECO takes note of the information provided. It is apparent that still no measures have been taken to implement the recommendation. As pointed out in the previous report, GRECO is not convinced that sufficient information is available to allow for the drawing of conclusions on the potential for problems or the understanding of the incompatibility of secondary activities on the part of police staff.
52. GRECO concludes that recommendation xi remains not implemented.

**Recommendation xii**

53. *GRECO recommended that a study be conducted concerning employment of staff of the police after they leave the police and that, in the light of the findings, a policy be adopted to minimise the risk of possible conflicts of interest in this respect.*
54. GRECO recalls that this recommendation was not implemented. The authorities had stated that the fact that former staff of the police are hired elsewhere was not considered an issue. Staff members were said to be well acquainted with the rules on

confidentiality of the Criminal Code, which continue to apply after leaving the police. A new survey, as suggested by GRECO, was found not to serve any purpose in the Danish context, as it would depend on the willingness of former employees to participate. In view of these elements, the Danish authorities took the view that the initiatives already in place, such as the implementation of the whistleblower regulations, were more suited to deal with cases where there are doubts about the impartiality of staff. GRECO regretted that the matter was dismissed outright, without this being supported by available data, and was again framed with reference to the Criminal Code, demonstrating a lack of sensitivity to integrity-related risks which do not rise to the level of crime.

55. The Danish authorities do not report any new information in respect of the recommendation.
56. GRECO concludes that recommendation xii remains not implemented.

### **Recommendation xiii**

57. *GRECO recommended that the authorities analyse the need for introducing a requirement for certain officials within the police to declare financial interests on a regular basis.*
58. It is recalled that this recommendation was not implemented in the Compliance Report. The authorities had referred to several initiatives to enhance the management of risks associated with procurement, including the obligation upon procurement officers to register close personal relationships with people employed by companies that could supply goods or services to the Danish police, as well as to register their directorships, ownerships, joint ownerships (etc.) of companies that could be potential suppliers to the police. Denmark did not believe that there was a need to analyse whether a further requirement to declare financial interests would be necessary. GRECO pointed out that these registration requirements were introduced in response to a scandal involving the procurement of IT equipment in the police, following an internal police report. However, a thorough reflection on the benefits of a requirement for certain officials in top management or particularly vulnerable positions in the police to declare their financial interests on a regular basis had not taken place.
59. The Danish authorities refer again to the above-mentioned registration requirements for procurement officers. They also note that employment in the Danish Police requires obtaining a security clearance by the Danish Security and Intelligence Service (DSIS). DSIS conducts a security investigation of the applicant. This security examination contains among other things the applicant's financial circumstances. Employees in the Danish Police are required to report significant changes in their financial circumstances. This process is not set in place specifically as a measure against corruption, but helps to inform DSIS' overall assessment of the applicant's character and financial vulnerability.
60. GRECO takes note of the information provided. While it assessed positively in the Evaluation Report the standard vetting of all police officers upon recruitment to the level

of “confidential”, it had noted that in practice, ten years may elapse before they would need to be re-vetted at the same security level or to a higher level when moving to a new position. Moreover, the level of “confidential” does not include a wider check of the economic situation of the officer in question. GRECO is of the view, therefore, that the vetting system does not sufficiently capture possible integrity risks linked to the financial situation of certain police officers. The need for introducing a requirement for certain police officers to declare their financial interests on a regular basis has still not been properly analysed.

61. GRECO concludes that recommendation xiii remains not implemented.

**Recommendation xiv**

62. *GRECO recommended that measures be taken to raise awareness of staff of the police of their duty to report corruption-related misconduct within the police service.*
63. GRECO recalls that, in the absence of any measures taken to give effect to the recommendation, it had considered it not implemented in the Compliance Report.
64. The Danish authorities report that all employees in the police must comply with Section 10 of the Staff Regulations, which states that the official must conscientiously “comply with the rules governing his position both in and out of service, worthy of the respect and trust, as the position requires.” Employees are aware of the process in relation to turning to their union representative, their immediate manager, the human resources department or the Independent Police Complaints Authority if they observe corruption-related misconduct. Students attending the Police Basic Education are introduced to their obligation to comply with the law in the primary parts of the education. This includes, among other things, a lesson in which the students discuss and reflect on the inherent dilemmas of when and how to speak up against a colleague who crosses the line. The students are also taught how to handle gifts and corruption. The students, among other things, work with group assignments in which one of the assignments deals with the receipt of gifts. The assignments are then reviewed in the class where the students discuss the matter. It is the opinion of the Police College that all police officers after completing their education have a good understanding of their obligation to comply with the law and to take action against illegal behaviour in the police.
65. GRECO takes note of the information provided. The attention given to the duty to report misconduct during the Police Basic Education is welcome. However, it is important to keep raising awareness of staff on this issue throughout their career. This sends the message that misconduct within the police force is taken seriously by police management and relevant structures at that it will not be tolerated. Such continued attention is helpful in countering any possible “code of silence” that may develop among colleagues serving side by side. This would be all the more useful that the above-mentioned Section 10 of the Staff Regulation does not specifically mention the duty to report misconduct. As such, it does not appear that any measures have been taken to implement this recommendation.

66. GRECO concludes that recommendation xiv remains not implemented.

### III. CONCLUSIONS

67. **In view of the foregoing, GRECO concludes that Denmark has still dealt with in a satisfactory manner only two of the fourteen recommendations contained in the Fifth Round Evaluation Report.** Of the remaining recommendations, one remains been partly implemented and eleven remain not implemented.

68. More specifically, recommendations ix and x have been dealt with in a satisfactory manner, recommendation iii has been partly implemented and recommendations i, ii, iv, v, vi, vii, viii, xi, xii, xiii and xiv have not been implemented.

69. With respect to top executive functions, no progress has been made on any of the recommendations. The only positive step is the announced establishment of an expert committee to prepare proposals for a new Access to Public Administration Files Act. However, this process is still at a very early stage. The authorities essentially repeat the information and arguments already assessed by GRECO in the Evaluation and Compliance Reports. As already highlighted in previous reports, the frequent references to the provisions of the Criminal Code (e.g. on bribery and confidentiality) confirm a lack of sensitivity to integrity issues which do not rise to the level of crime. There is sadly no indication that the gaps in existing rules and policies highlighted in the previous reports are being addressed. An analysis of integrity-related risks involving members of the government and special advisers as a basis for a future integrity strategy is still lacking. There is still no code of conduct for persons with top executive functions (PTEFs). The transparency of lobbying needs to be increased and rules introduced on how to deal with the employment of PTEFs following the termination of their public service. More data must be included in the financial declarations of ministers and these declarations must be subject to substantive control. In light of the above, GRECO deeply regrets Denmark's plainly expressed refusal to implement several recommendations. It can only urge the Danish authorities to revisit this position and address the concerns underlying the abovementioned recommendations.

70. As far as law enforcement agencies (police) is concerned, the situation is the same as in the previous report. No new measures or information are reported in respect of improving the system of authorising secondary activities, conducting a study on the employment of staff once they leave the police, analysing the need for introducing a requirement for certain officials to declare financial interests and raising the awareness of staff on their duty to report corruption-related misconduct. GRECO again stresses the need for the authorities to take determined action in this regard.

71. In view of the above, GRECO concludes that Denmark is not in sufficient compliance with the recommendations contained in the Fifth Round Evaluation Report within the meaning of Rule 31 revised bis, paragraph 10 of the Rules of Procedure. GRECO therefore decides to apply Rule 32 revised, paragraph 2 (i) and asks the Head of

delegation of Denmark to provide a report on the progress in implementing the outstanding recommendations (i-viii and xi-xiv) by 31 December 2024.

72. In addition, in accordance with Rule 32 revised, paragraph 2, sub-paragraph (ii.b), GRECO invites the President of the Statutory Committee to send a letter – with a copy to the Head of delegation of Denmark – to the Permanent Representative of Denmark to the Council of Europe, drawing attention to the non-compliance with the relevant recommendations and the need to take determined action with a view to achieving tangible progress as soon as possible.
73. Further, in accordance with Rule 32 revised, paragraph 2, subparagraph (iii), GRECO requests the authorities of Denmark to receive a high-level mission with a view to reinforcing the importance of complying with the relevant recommendations.
74. GRECO invites the authorities of Denmark to authorise as soon as possible the publication of this report, to translate it into the national language and to make the translation public.