



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



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## FOURTH EVALUATION ROUND

Corruption prevention in respect of members of  
parliament, judges and prosecutors

### FOURTH *INTERIM* COMPLIANCE REPORT

### DENMARK

Adopted by GRECO at its 98<sup>th</sup> Plenary Meeting  
(Strasbourg, 18-22 November 2024)

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## **I. INTRODUCTION**

1. The [Fourth Round Evaluation Report on Denmark](#) was adopted at GRECO's 63<sup>rd</sup> Plenary meeting (28 March 2014) and made public on 16 April 2014, following authorisation by Denmark. GRECO addressed in total six recommendations to Denmark.
2. The [Compliance Report](#) was adopted by GRECO at its 71<sup>st</sup> Plenary meeting (18 March 2016) and made public on 15 April 2016, following the authorisation by the Danish authorities.
3. The [Second Compliance Report](#) was adopted by GRECO at its 80<sup>th</sup> Plenary meeting (22 June 2018) and made public on 12 September 2018, following the authorisation by the Danish authorities. GRECO concluded in this Report that the low level of compliance was "globally unsatisfactory" in the meaning of Rule 31, paragraph 8.3 of its Rules of Procedure. GRECO therefore decided to apply Rule 32 concerning members not found to be compliant with the recommendations contained in the mutual evaluation report.
4. The [Interim Compliance Report](#) was adopted by GRECO at its 84<sup>th</sup> Plenary meeting (6 December 2019) and made public on 5 February 2020, following the authorisation by the Danish authorities. In this report, GRECO noted that Denmark had fully complied with the two recommendations concerning "*Corruption prevention in respect of judges and prosecutors*", while the very low level of compliance with the recommendations concerning "Corruption prevention in respect of members of parliament" remained "globally unsatisfactory" in the meaning of Rule 31, paragraph 8.3 of its Rules of Procedure.
5. In the [Second Interim Compliance Report](#), adopted by GRECO at its 88<sup>th</sup> plenary meeting (22 September 2021) and made public on 25 November 2021, it was concluded that Denmark had made no progress in implementing the four recommendations concerning members of parliament contained in the Fourth Round Evaluation Report. Out of six recommendations in total, only two had been implemented satisfactorily, while three were partly implemented and one not implemented. GRECO therefore concluded that the level of compliance with the recommendations remained "globally unsatisfactory" within the meaning of Rule 31 paragraph 8.3 of the Rules of Procedure. In accordance with Rule 32, paragraph 2, subparagraph ii.b), GRECO called on the President of the Statutory Committee to send a letter to the Permanent Representative of Denmark to the Council of Europe drawing his attention to non-compliance with the relevant recommendations and the need to take resolute steps to achieve tangible progress as soon as possible.
6. In the [Third Interim Compliance Report](#), adopted by GRECO at its 93<sup>rd</sup> plenary meeting (24 March 2023) and made public on 10 August 2023, it was concluded that the very low level of compliance with the recommendations, remained "globally unsatisfactory" in the meaning of Rule 31, paragraph 8.3 of its Rules of Procedure. In accordance with Rule 32, paragraph 2(ii) (c) GRECO invited the Secretary General of the Council of Europe to send a letter to the Minister of Foreign Affairs of Denmark, drawing the attention to non-compliance with the relevant recommendations.
7. GRECO therefore decided to continue to apply Rule 32 concerning members found not to be in compliance with the recommendations contained in the mutual evaluation report and asked the Head of the Danish delegation to provide a report on the progress made by 31 March 2024.

8. On 26 August 2024, the authorities of Denmark submitted a Situation Report on further measures taken to implement the pending recommendations. This information served as a basis for this Fourth Interim Compliance Report.
9. GRECO selected the United Kingdom to appoint a Rapporteur for the compliance procedure (in respect of "*Corruption prevention in respect of members of parliament*"). The Rapporteur appointed was Ms Fariha KHAN. She was assisted by GRECO's Secretariat in drawing up this Fourth Interim Compliance Report.

## **II. ANALYSIS**

### *Corruption prevention in respect of members of parliament*

10. It is recalled that GRECO addressed four recommendations to Denmark in its Evaluation Report in respect of members of parliament. Compliance with these recommendations is dealt with below.

#### **Recommendation i to iv**

11. *GRECO recommended:*

- *that a code of conduct for members of parliament – including, inter alia, guidance on the prevention of conflicts of interest, on questions concerning gifts and other advantages and on how to deal with third parties seeking to obtain undue influence on MPs' work – be adopted and made easily accessible to the public; and (ii) that it be complemented by practical measures for its implementation, such as dedicated training or counselling;*
- *that a requirement of ad hoc disclosure be introduced when a conflict between the private interests of individual members of parliament may emerge in relation to a matter under consideration in parliamentary proceedings;*
- *that regular public registration of occupations and financial interests by members of parliament be made mandatory; (ii) that the existing system be further developed, in particular, by including quantitative data on the occupations and financial interests of members of parliament as well as data on significant liabilities; and (iii) that consideration be given to widening the scope of the declarations to also include information on spouses and dependent family members (it being understood that such information would not necessarily need to be made public);*
- *that appropriate measures be taken to ensure supervision and enforcement of i) the rules on registration of the occupations and financial interests by members of parliament and ii) standards of conduct applicable to them, where necessary.*

12. It is recalled that in the Third Interim Compliance report, it was assessed that recommendations i, iii and iv had been partly implemented and recommendation ii had not been implemented. At that stage, the Danish authorities did not report anything new in respect of the implementation of these recommendations.
13. The Danish authorities inform GRECO that the legal regime applicable to members of parliament remains unchanged and that there is nothing new to report in this respect.
14. In the absence of any developments, GRECO concludes that recommendations i, iii and iv remain partly implemented and recommendation ii remains not implemented.

### **III. CONCLUSIONS**

15. **In view of the foregoing, GRECO concludes that there has been no progress in Denmark's level of implementation of the four recommendations concerning members of parliament contained in the Fourth Round Evaluation Report. Out of six recommendations in total, only two have been implemented satisfactorily** (concerning judges and prosecutors, as noted in previous reports), three remain only partly implemented and one not implemented (all pending recommendations in respect of members of parliament).
16. More specifically, recommendations i, iii and iv remain partly implemented and recommendation ii remains not implemented.
17. GRECO regrets that the outstanding recommendations regarding MPs remain unresolved. A Code of Conduct for members of parliament must be issued and coupled with counselling, awareness-raising, and supervision measures. The public registration system of occupations and financial interests of MPs needs to be further developed.
18. In view of the above, GRECO cannot but again conclude that the current very low level of compliance with the recommendations remains "globally unsatisfactory" within the meaning of Rule 31, paragraph 8.3 of its Rules of Procedure.
19. Pursuant to Rule 32, paragraph 2(i) of the Rules of Procedure, GRECO asks the Head of the Danish delegation to provide a report on the progress made in implementing recommendations i-iv by 30 November 2025 at the latest.
20. In addition, in accordance with Rule 32, paragraph 2(ii) (c) GRECO invites the Secretary General of the Council of Europe to send a letter – with a copy to the Head of delegation of Denmark – to the Minister of Foreign Affairs of Denmark, drawing the attention to non-compliance with the relevant recommendations and the need to take determined action with a view to achieving tangible progress as soon as possible.
21. GRECO recalls that, in the framework of the Fifth-Round compliance procedure, in accordance with Rule 32 revised, paragraph 2, subparagraph (iii), the authorities of Denmark will receive a high-level mission with a view to reinforcing the importance of complying with the outstanding Fifth Round recommendations. In this connection, GRECO considers that, owing to Denmark's "globally unsatisfactory" compliance level with the Fourth-Round recommendations since June 2018, the importance of complying with those outstanding recommendations should be emphasised at that same high-level mission, in accordance with Rule 32, paragraph 2, sub-paragraph (iii).
22. Finally, GRECO invites the authorities of Denmark to authorise, as soon as possible, the publication of the report, to translate the report into the national language and to make this translation public.