OECD Anti-Corruption and Integrity Outlook: Country Fact Sheet 2024

Denmark

Contextual factors

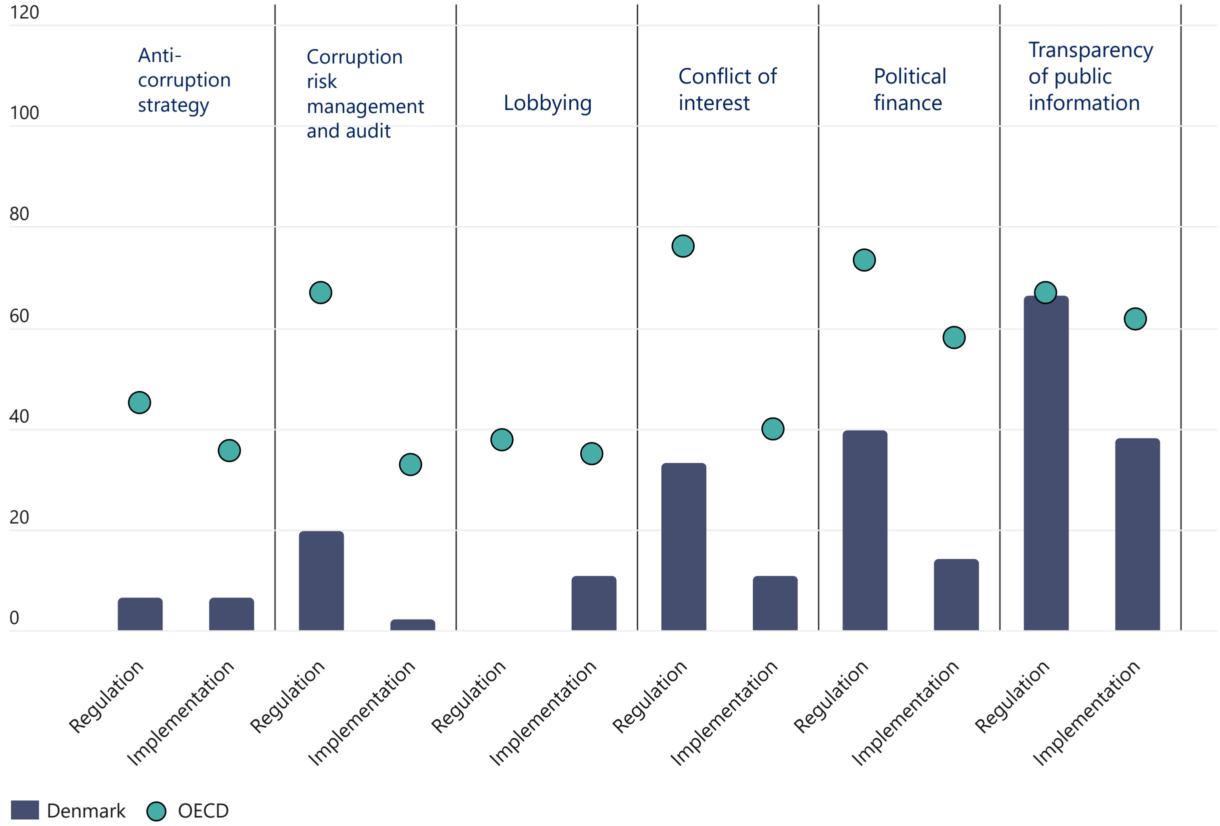
State structure	Executive power	Legislative system	Legal system
Unitary	Government	Unicameral	Civil law

Strategy and institutions on anti-corruption and public integrity

Denmark has no standalone strategy with strategic objectives to combat corruption and strengthen public integrity. However, the Executive Order, no. 116 19/02/2018 has sets a primary strategic objective to mitigate public integrity risks in internal control and risk management. Furthermore, the Public Administration Act addresses conflict of interest for public officials and is supplemented by the general fundamental legal principle of impartiality. Denmark's Act on Openness in Administration regulates access to information and its Company Act makes certain disclosures for companies mandatory. The Public Sector Information Law, which is the Danish transposition of the European Open Data Directive, lays down a legal framework for the re-use of public sector information. The Danish Agency for Digital Government is responsible for the implementation of this law, including the operation of the National Data Portal, Datavejviser.dk. In terms of institutions, Denmark has no central body for anti-corruption. However, the Employee and Competence Agency under the Ministry of Finance and the Prime Minister's Office have responsibilities regarding the promotion of integrity among civil servants and ministers. The Ministry of Justice ensures cooperation between national authorities in elaborating anti-corruption measures. However, there is no independent body overseeing political finance, nor central bodies for lobbying activities, internal control and internal audit.

Overview

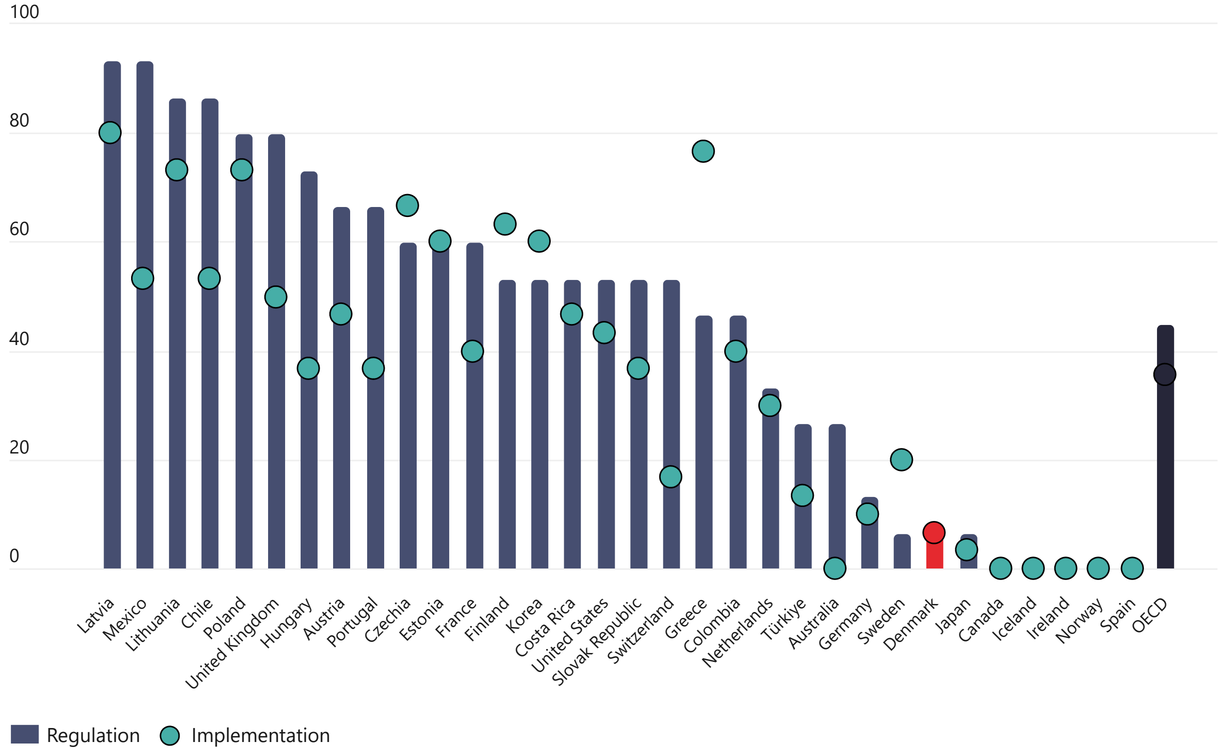
Figure 1. Overview



Greatest strengths	Areas to improve
Transparency of public information	Lobbying
Political finance - regulation	Corruption risk management and audit
Trust in parliament	Anti-corruption strategy

Anti-corruption strategy

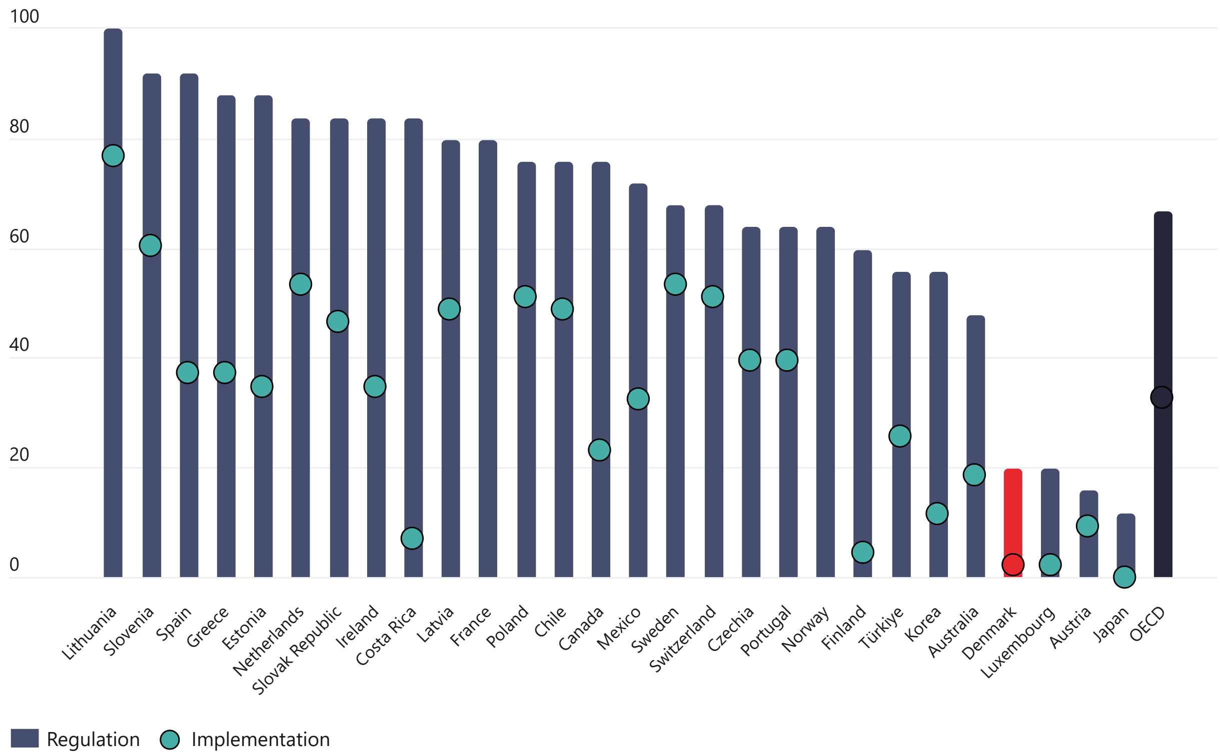
Figure 2. Anti-corruption strategy



Denmark fulfils 7% of standard OECD criteria on the quality of its strategic framework and 7% for implementation in practice, compared to the OECD average of 45% and 36%, respectively. E.O. no. 116 of 2018 does not include a situation analysis that identifies existing public integrity risks. It also has no outcome-level indicators to measure implementation of strategic objectives and does not include an action plan to facilitate implementation.

Corruption risk management and audit

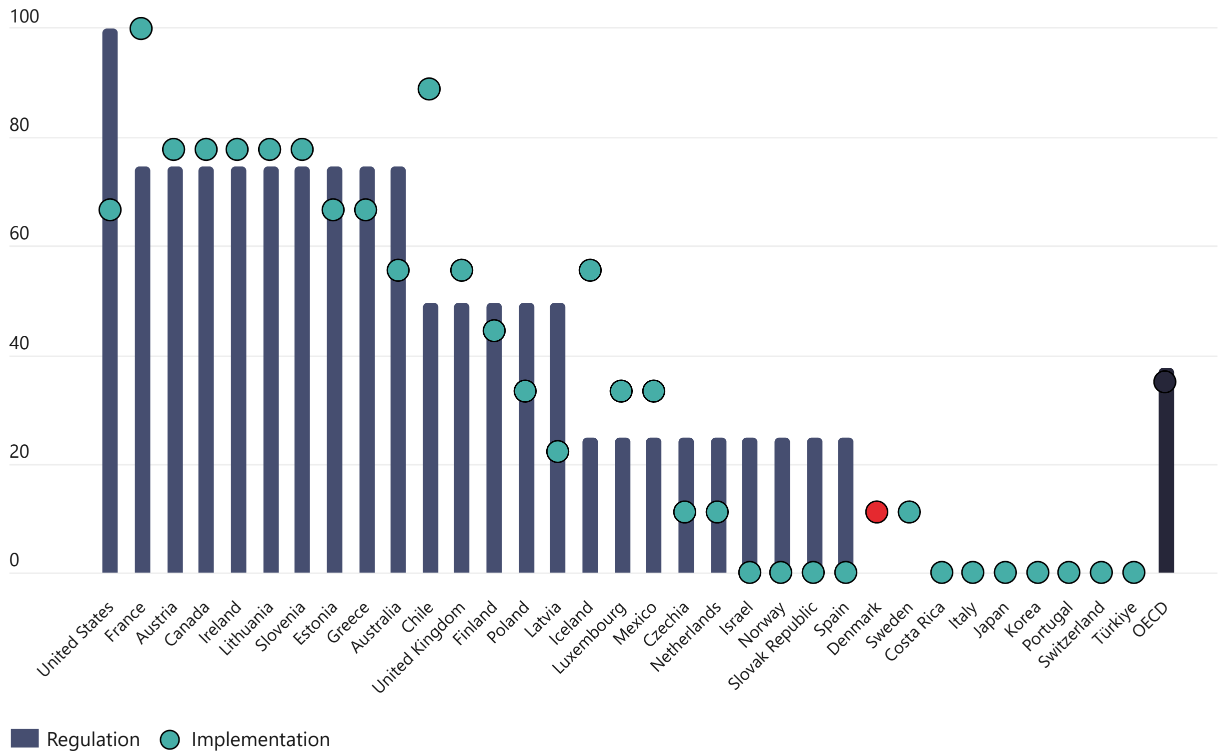
Figure 3. Corruption risk management and audit



As measured against OECD standards on risk management, which include internal control and internal audit, Denmark fulfils 20% of criteria for regulations, compared to the OECD average of 67%. Regulations specify the objectives of internal control and managerial responsibility for implementing internal control. However, there is an implementation gap as Denmark only fulfils 2% of criteria for practice, compared to the OECD average of 33%. There is no risk management framework and, in addition to limited reporting mechanisms on internal control and internal audit, not all budget organisations use integrity risk management in practice. Regarding internal audit safeguards, Denmark fulfils no criteria for regulations o practice. This means, for example, that there is no formal requirement for ministries or state institutions to have an internal audit unit and that there is no central harmonisation unit in place. Consequently, many bodies are not performing internal audit. Internal audit units do not have to submit their annual activity reports, and more than half have not undergone external quality assurance of the internal audit function within the past five years. There is no data available on the public organisations audited in the past five years and the adoption rate of internal audit recommendations.

Lobbying

Figure 4. Lobbying



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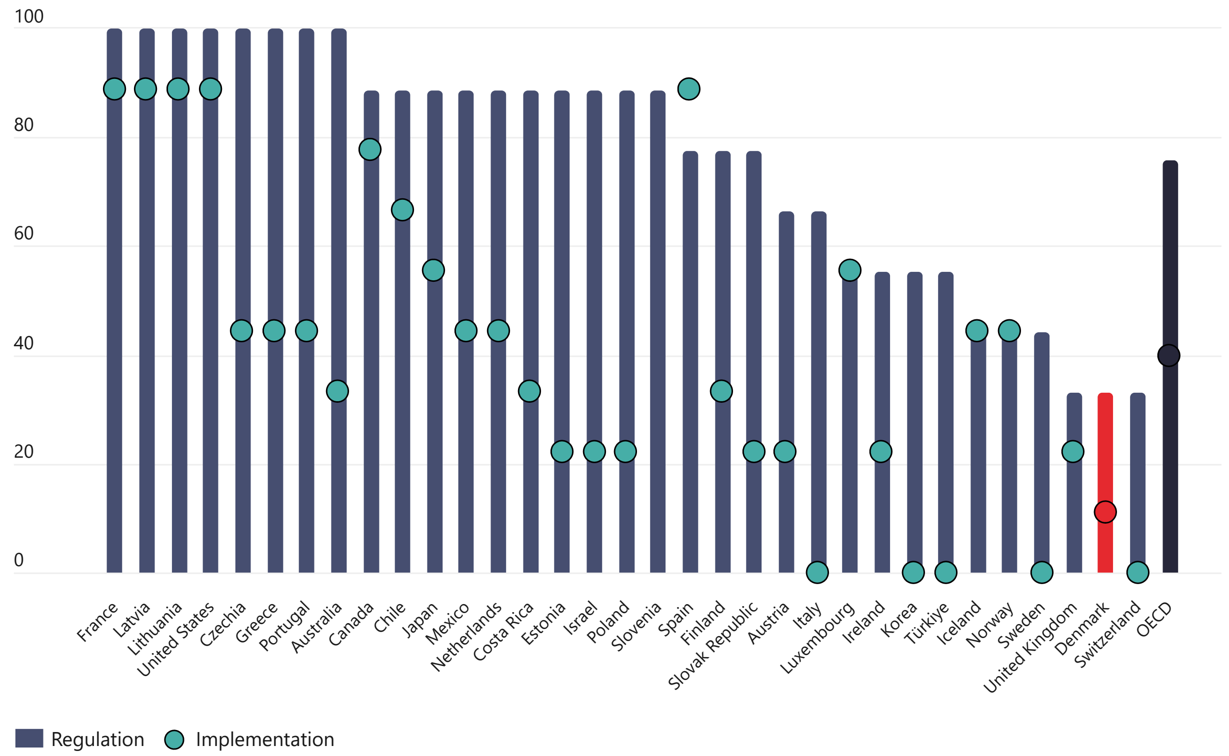
As measured against OECD standards on lobbying, Denmark fulfils 0% of the criteria for regulations and 11% for practice, compared to the OECD average of 38% and 35%, respectively.

While Denmark has a register of beneficial ownership of corporate entities, lobbying activities are not regulated by law. This means that there is no definition of lobbying activities, no mandatory cooling-off period for public officials or lobbyists, and no supervisory function in central government that oversees transparency of lobbying activities. Moreover, there is no publicly accessible lobbying register that discloses information on who is lobbying, how they are lobbying, and what they are lobbying about. This limits the amount of transparency in the policy making process.

Conflict of interest

Figure 5. Conflict of interest

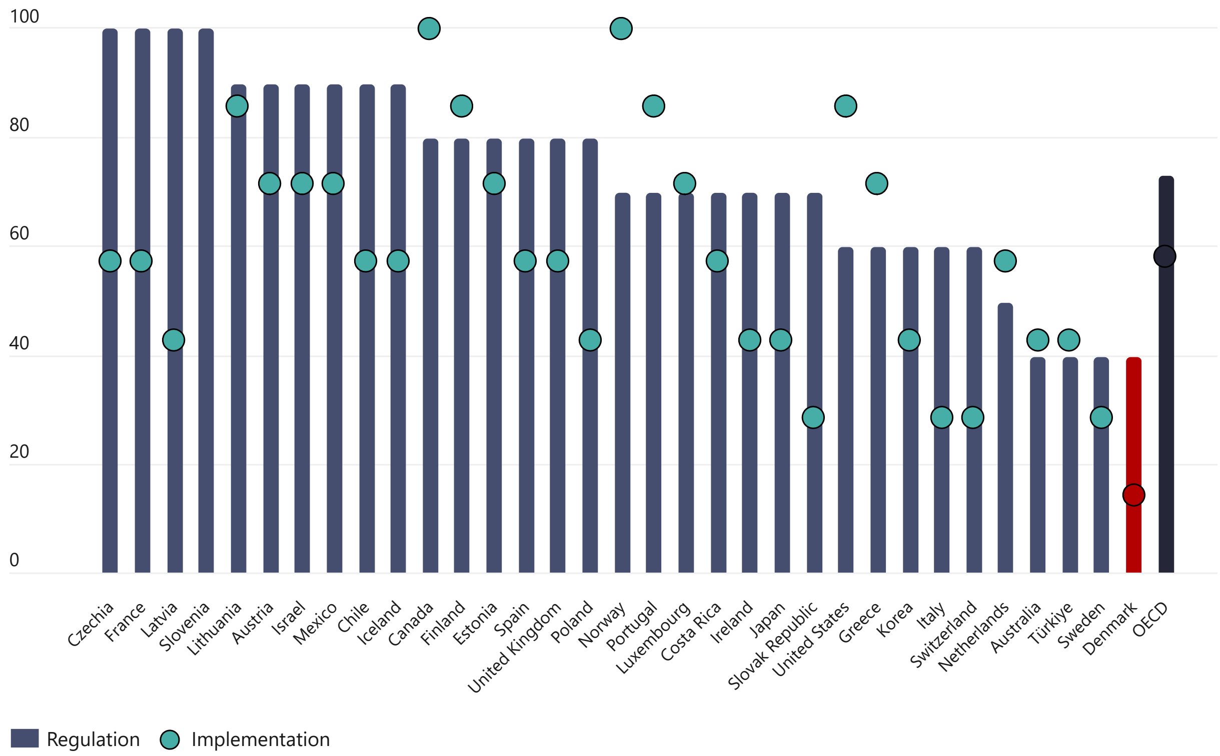


As measured against OECD standards on conflict of interest, Denmark fulfils 33% of criteria for regulations and 11% for practice, compared to the OECD average of 76% and 40%, respectively.

The regulatory framework defines circumstances and relationships that can lead to conflict-of interest situations for public officials. While all members of parliament must submit an interest declaration, this is not the case for members of the highest bodies of the judiciary, public employees in a high-risk position, or top-tier civil servants of the executive branch, in contrast to more than half of OECD countries. All declarations are submitted electronically, but declarations are not selected for verification according to a risk-based approach and there is no central data on the number of interest declarations verified by the responsible authority.

Political finance

Figure 6. Political finance

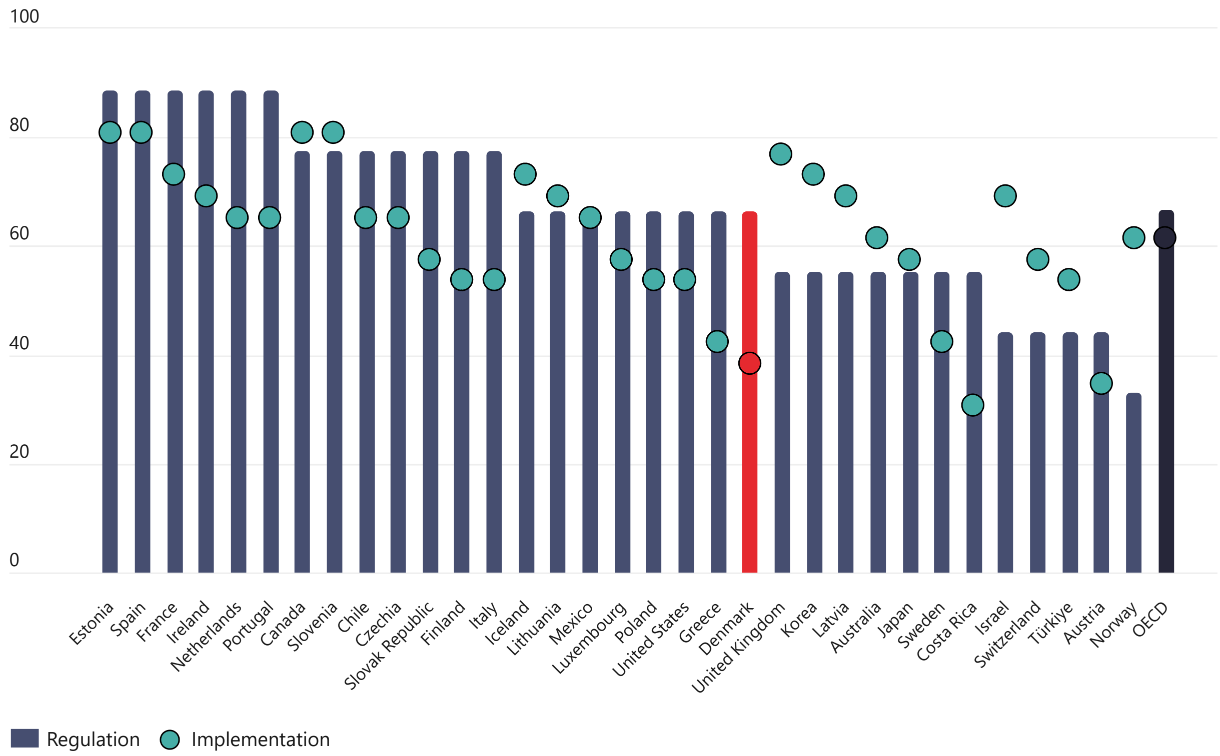


As measured against OECD standards on political finance, Denmark fulfils 40% of criteria for regulations but only 14% for practice, compared to the OECD average of 73% and 58%, respectively.

Denmark's Political Parties Funding Act defines sanctions for breaches of political finance and election campaign regulations and specifies that electoral candidates can be held personally liable for breaches and be sanctioned. Moreover, political parties are required to make financial reports public. However, there are no bans on anonymous donations below DKK 23 600 (3166 €), contributions from foreign states or enterprises, or publicly owned enterprises. Additionally, political parties are not required to report their finances during electoral campaigns.

Transparency of public information

Figure 7. Transparency of public information



As measured against OECD standards on public information, which include access to information and open data, Denmark fulfils 67% of criteria for regulations and 38% for practice, compared to the OECD average of 67% and 62%, respectively.

Denmark's regulatory framework for access to information and open data– the Act on Openness in Administration – ensures the universal entitlement of all individuals, irrespective of citizenship or legal status, to access information across various modalities. Access restrictions are listed by law and in line with the Tromso Convention. Statutory deadlines are in place for processing information requests, and requesters are not required to provide justification for their requests. Furthermore, a safeguard is established ensuring the right to appeal to an impartial external body or court in instances of refusal or administrative inactivity.

Many key datasets necessary to ensure integrity are publicly available in Denmark, including the state budget, election results, public tenders and their results, the business and land registries, and salaries of top-level civil servants. However, it is worth noting that several other key datasets are not published. Laws are not published in their consolidated forms, and agendas of ministers and cabinet sessions, asset and interest declarations, and aggregated data on access to information requests are also not published.

Denmark shows a relatively high trust in parliament, exceeding OECD average. More than half of the population trust their parliament (51%) compared to the OECD average of 41%.