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FOURTH EVALUATION ROUND

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

FIFTH *INTERIM* COMPLIANCE REPORT DENMARK

Adopted by GRECO at its 102nd Plenary Meeting
(Strasbourg, 23-27 March 2026)

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I. INTRODUCTION

1. The [Fourth Round Evaluation Report on Denmark](#) was adopted at GRECO's 63rd 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 71st 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 80th 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 84th 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 88th 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 93rd 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. In the [Fourth Interim Compliance Report](#) adopted by GRECO at its 98th plenary meeting (22 November 2024) and made public on 25 March 2025, it was concluded that the current very low level of compliance with the recommendations remained "globally unsatisfactory" within the meaning of Rule 31, paragraph 8.3 of its Rules of Procedure. In addition, in accordance with Rule 32, paragraph 2(ii) (c) GRECO invited 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. GRECO further 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 30 November 2025.

8. In addition, in accordance with Rule 32 revised, paragraph 2, subparagraph (iii), GRECO requested the authorities of Denmark to receive a high-level mission with a view to reinforcing the importance of complying with the relevant recommendations. The high-level mission took place on 7 April 2025 (see [press release](#)). The GRECO delegation deeply regretted that no additional measures were foreseen to address the recommendations regarding members of Parliament, as this was contrary to Denmark's commitment as a member of GRECO to effectively prevent corruption. The delegation therefore urged the Danish Parliament to strengthen integrity measures for parliamentarians as a matter of priority.
9. On 1 December 2025, 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 Fifth Interim Compliance Report.
10. 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 Fifth Interim Compliance Report.

II. ANALYSIS

Corruption prevention in respect of members of parliament

11. 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

12. *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.*

13. It is recalled that in the Fourth 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 had not reported anything new in respect of the implementation of those recommendations.
14. 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.
15. 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

16. In light 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).
17. More specifically, recommendations i, iii and iv remain partly implemented and recommendation ii remains not implemented.
18. GRECO deeply regrets that, 12 years after the adoption of the Fourth Round Evaluation Report, none of the recommendations addressed to members of parliament have been fully met. It is essential that a Code of Conduct for members of parliament is issued and coupled with counselling, awareness-raising, and supervision measures. A requirement of *ad hoc* disclosure for members of parliament when a conflict of interest may emerge should be introduced. The public registration system of occupations and financial interests of MPs needs to be further developed.
19. GRECO further notes that there is little prospect of progress on the outstanding matters referred to above. Denmark has taken no action to implement the four outstanding recommendations since 2020, despite GRECO's high-level mission, which aimed to generate momentum and advance reforms, offering an opportunity to discuss how best to achieve the recommended legislative and policy changes. The Danish Parliament's explicit refusal to pursue implementation of these recommendations is a setback, particularly in light of Denmark's previous commitment and strong performance within GRECO.
20. In view of the situation described above, having resorted to the measures provided for in Rule 32, paragraph 2 (i), (ii) and (iii), GRECO decides to terminate the compliance procedure in respect of Denmark and to cease the application of Rule 32, while noting with deep regret that Denmark is not in sufficient compliance with the recommendations issued under the Fourth Evaluation Round, in particular those concerning members of parliament. While GRECO refrains from issuing a public declaration of non-compliance, a measure provided for in Rule 32, paragraph 2 (iv), GRECO nevertheless makes clear its dissatisfaction with this state of affairs, which is contrary to Denmark's commitment, as a member of GRECO, to effectively prevent corruption.

21. Accordingly, the adoption of this Fifth Interim Compliance Report terminates the Fourth Round compliance procedure with respect to Denmark. The Danish authorities are invited to keep GRECO informed of further developments concerning the implementation of recommendations i-iv, which remains incomplete at the time of the adoption of the present report.
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.