



FOLKETINGETS  
OMBUDSMAND



The Danish Parliamentary Ombudsman has been elected by Parliament. His task is to help ensure that administrative authorities act in accordance with the law and good administrative practice, thus protecting citizens' rights vis-à-vis the authorities. The Ombudsman investigates complaints, opens cases on his own initiative and carries out monitoring visits.

# Annual Report 2025

**The Danish Parliamentary Ombudsman**

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## About this international edition of the 2025 Annual Report of the Danish Parliamentary Ombudsman

In accordance with the Ombudsman Act, the Danish Parliamentary Ombudsman submits an annual report on his work to the Danish Parliament. This international edition of the 2025 Annual Report of the Danish Parliamentary Ombudsman seeks to share information and experiences internationally with colleagues and others with a special interest in ombudsman work. It contains our entire Danish report, and due to the great diversity of ombudsman institutions around the world, we have included an appendix which will enable readers with a special interest to get a deeper understanding of the Danish Ombudsman institution.

Enjoy the read!

Copenhagen, 7 April 2026

A handwritten signature in blue ink, consisting of a large, stylized 'C' followed by a series of loops and a long horizontal stroke.

Christian Britten Lundblad  
Parliamentary Ombudsman

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# 2025 at the Ombudsman Office

By Christian Britten Lundblad,  
Parliamentary Ombudsman

On 1 May 2025, I took office as new Parliamentary Ombudsman – and from the very first day, it has been a great pleasure to become a part of this exceptional workplace, which is characterised by a high degree of professional expertise and integrity. I have stepped into an institution that is focused on ensuring citizens' legal rights in their encounters with administrative authorities and at the same time contributing to the development of good case processing.

I took over the position from High Court Judge Henrik Bloch Andersen, who in the period from October 2024 until the end of April 2025 was acting Ombudsman after Niels Fenger took up a position as judge at the Court of Justice of the European Union.

I owe them both a great thank you for having introduced me to the position in the best way possible and for the great work they have both done to leave behind a well-run institution.

## Invaluable knowledge from monitoring activities

Ever since I started, I have been very engaged with how the institution can be of best use to the citizens.

I find it particularly important that we at the Ombudsman Office notice and are interested in the most vulnerable citizens; those that for various reasons have difficulty taking care of their own interests.

I feel very strongly that the Ombudsman should be there for – and accessible to – precisely them.

In that connection, especially our monitoring activities play a central role as our monitoring visits allow us to get out in the field and in direct dialogue with citizens who often find themselves in difficult and stressful situations. These may be children and young people placed outside the home in institutions, prison inmates, remand prisoners or patients in departments of forensic psychiatry.

The monitoring visits provide us with direct information about the living conditions for these people, which is quite invaluable.

I have myself participated in monitoring visits in 2025 to an institution for children in care, to a local prison and to a department of forensic psychiatry, and in all of those places it has made a great impression on me to talk with the institutionalised people and the staff and to see the conditions with my own eyes.

You can read about our monitoring activities on pages 32-43.

### **Closer to municipalities and citizen advisors**

Another element in my efforts to reach out to all parts of our society is my goal to visit all our municipalities and their citizen advisors.

In 2025, I had the pleasure of visiting 10 municipalities, and I expect to be visiting about 20 municipalities in each of the coming years. The visits allow me to enter a dialogue with the branches of the administration that are in closest contact with the citizens, and I have also used the occasion to establish a contact committee with the municipal citizen advisors. After all, it is precisely the citizen advisors who meet the citizens locally.

You can read more about the purpose and the benefit of my visits to the municipalities and the dialogue with the citizen advisors in the article 'The Ombudsman on tour', pages 48-52.

To this I will just add that I have supplemented the visits to the municipalities with an extended contact with legal aid institutions and other organisations that have direct contact with vulnerable citizens. In 2025, I visited, among others, Stenbroens Jurister, Gadejuristen, Mændenes Hjem, Reden and Joannahuset.

And in closing this theme, let me mention that I have in 2025 also been involved in establishing a closer cooperation with my colleagues in the Faroe Islands and Greenland about, among other things, exchange of staff and joint course and training activities.

### **New mission, vision and values**

2025 was a busy year here at the Ombudsman Office. We received a record number of complaints – namely about 7,100 against about 6,000 in 2024, which at the time was the highest number so far. This corresponds to an increase of about 18 per cent. And it must be expected – based on the experience of my Nordic colleagues, among other things – that the number of complaints will continue to rise in the coming years.

In the light of, among other things, this expected development – and thereby the need for being able to free resources for essential priorities – I have, together with my excellent staff, spent quite some time on setting a course for the coming years. One of our initiatives has been to establish an adjusted mission and vision for the Ombudsman Office and to formulate the values that are the foundation of the institution and that briefly describe the staff that I have been given the pleasure of working with:

- We stand for a high degree of professional expertise, independence and integrity.
- We are ambitious and thinking along new lines in order to make an even greater difference.
- We are receptive, fair and conscientious both in the internal and the external sphere of contact.
- We have a learning work environment with mutual recognition, trust and cooperation across the institution.

The adjusted mission for the institution is thus as follows:

'With the Constitutional Act as a starting point, the Parliamentary Ombudsman safeguards legal rights and a democratic society based on the rule of law. By ensuring that the administrative

authorities act in accordance with the law and follow good administrative behaviour, we protect the citizens' rights in their encounters with the authorities.'

The mission is supplemented by three general visions or guiding principles for us to be relevant and visible and to invest in development.

### Significant statements and trends

Some general trends characterised a number of my statements in 2025, including in particular the issue of long case processing times.

A number of authorities have received statements with criticism of protracted case processing times – both the directly responsible authority and appeals bodies.

It is my opinion that long case processing times are generally a problem for the citizens' trust in the authorities – it is a globally acknowledged principle that 'justice delayed is justice denied'. I have a special focus on this issue, not least when it comes to cases with a major impact on the individual citizen's immediate welfare.

On pages 28-31, you can read about some of the year's statements on case processing times.

Citizens' access to contacting public authorities is also a focus point for me – as is expressed in, among others, my statement from December 2025 to the tax authorities regarding accessibility on the telephone (the case FOB 2025-19, also mentioned on page 24). Much trust can be created through dialogue – and many mistakes can be rectified directly. In step with the increased digitalisation of the case processing, the citizens' access to contact only becomes even more

important, and such access can be established in various ways.

In that respect, I have started an investigation of the Danish Property Assessment Agency's decisions on property assessments – for also here, it is important for the trust in the taxation system that citizens understand and perhaps can get a detailed explanation for a specific assessment. And the investigation will undoubtedly have an influence on part of our work in 2026. Read about my investigations of the property assessment field on page 26.

Lastly, I would like to highlight a statement from August 2025 in which I recommended that free legal aid was granted in a case on access to indictments connected to the case that the media refer to as the Defence Intelligence Service (FE) case. Our democratic legal society is founded on openness, in particular in cases before the courts of law. And as the issue was already being tried by the courts, I found it most appropriate that this complaint regarding access to files was also tried as part of the case. My investigation of the case must be seen in the light of the joint legal thinking that is necessary in the courts and in the Ombudsman Office (the case FOB 2025-11, also mentioned on page 16).

I hope that you enjoy reading the Annual Report! There will undoubtedly be many new things to keep track of in the coming years, so keep up to date via the news stories on our website [www.en.ombudsmanden.dk](http://www.en.ombudsmanden.dk). You may also want to visit our Danish website, [www.ombudsmanden.dk](http://www.ombudsmanden.dk), where you will find, among other things, the Guide for Authorities and a link to subscribe to our newsletters.



# **About the cases**



**Complaint  
cases**



**Own-initiative  
investigations**



**Monitoring  
activities**



### Cases opened in 2025<sup>1</sup>

# 7,358

Own-initiative investigations

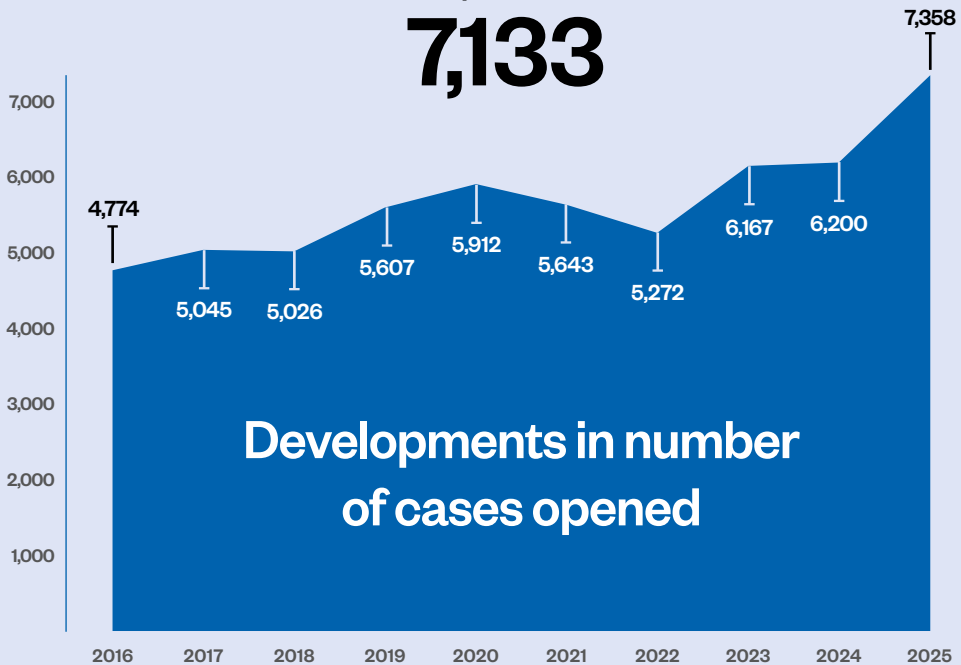
## 164

Monitoring cases

## 61

Complaint cases

## 7,133



1) Administrative cases are not included. In addition, cases selected for collective review in connection with general own-initiative investigations are not normally included.



# **Complaint cases**

**Who:** In principle, anybody can complain to the Ombudsman, and it is not necessary to be a party to a case to lodge a complaint with the Ombudsman. A complainant cannot be anonymous.

**What:** The Ombudsman considers complaints about all parts of the public administration and in a limited number of situations also about private institutions, an example being complaints about conditions for children in private institutions.

The Ombudsman does not consider complaints about courts, nor about tribunals which make decisions on disputes between private parties.

**When:** The Ombudsman's task is to ensure that the authorities have observed the applicable rules. For this reason, the Ombudsman cannot consider cases before the authorities; he can consider a complaint only if the case has been considered by the relevant authority – and by any appeals bodies.

There is a deadline of one year for complaints to the Ombudsman.

**How:** When the Ombudsman receives a complaint, he first determines whether it offers sufficient cause for investigation. In some cases, the Ombudsman is unable under the Ombudsman Act to consider a complaint – for instance if the one-year deadline for complaints has been exceeded or if the case has not been considered by the relevant appeals body. In other cases, the Ombudsman chooses not to open an investigation, for instance because he would not be able to help the citizen achieve a better outcome.

In a large proportion of complaint cases, the Ombudsman helps the citizen by providing guidance or by forwarding the complaint to the relevant authority, for instance in order that the authority will be able to consider the complaint or give the citizen more details of the grounds for a decision which it has made.

In a number of cases, the Ombudsman discontinues his investigation because the authority chooses to reopen the case, for instance after being asked for a statement on the matter by the Ombudsman.

In some complaint cases, the Ombudsman carries out a full investigation, in which, among other things, he asks the authority to send him a statement on the matter. The investigation may result in the Ombudsman criticising the authority and recommending that it make a new decision.

## What are the complaints about?

### Issues relating to children

Complaints concerning issues relating to children and young people are lodged particularly by parents or by other relatives or caregivers. Many complaints are about various forms of measures in relation to and support for children and young people. The Ombudsman also receives complaints about, for instance, schools, daycare institutions and family law matters. A number of complaints are about the case processing by authorities or their case processing times.

### Social services

The majority of complaints involve municipalities, Udbetaling Danmark (an authority responsible for a number of public benefits), Labour Market Insurance or the National Social Appeals Board and are about, for instance, occupational injuries, pensions, home help, cash benefit, accompaniment or technical aids.

### Environment and building

Many of these complaints are made by a dissatisfied neighbour. Complaints are about, for instance, loss of privacy due to overlooking from a building or about noise. Other complaints are about wind turbines or solar panel installations. The complaints typically concern issues relating to compliance with rules on environmental protection or building and planning legislation.

### Taxation

Complaints are received from both citizens and businesses, including professional representatives of complainants, such as practising lawyers specialised in tax law or accountants. Examples of the subject matter of complaints include tax assessments, debt collection, property assessments and long processing times.

### Institutions for adults

The institutions complained about include prisons, departments of psychiatry and institutions for adults with disabilities. As residents and inmates typically spend 24 hours a day in the

institutions, the complaints cover all aspects of life – for instance relations with staff, feelings of unsafety with other residents/inmates or contact with relatives and friends.

### Access to public records under the Access to Public Administration Files Act, the Environmental Information Act etc.

Complaints are primarily about refusals by authorities to give access to information or documents or about processing times. A large proportion of the complaints are against the central government.

### Criminal cases and police etc.

Many of these complaints are made by citizens who are discontented because the police have dismissed a report or stopped an investigation. The Ombudsman also receives complaints about police handling of other types of cases or police conduct.

### Business and energy

Several complaints concern energy subsidy schemes. In 2025, some of the complaints were about refusals of applications for subsidies for home energy improvements from the 'Bygningspuljen' scheme. The Ombudsman also received a number of complaints about repayment of COVID-19 subsidy in 2025.

### The health sector

Complaints are received from, among others, citizens who are dissatisfied with treatment they have received in the healthcare system, including the psychiatric healthcare system. Another common theme for complaints is long processing times, for instance in complaint or licensing cases.

### Foreign nationals

A number of complaints are about authorities' processing times. In addition, the Ombudsman receives complaints about, among other things, refusals of family reunification, visas and permanent residence permits.

### Transport, communication and roads

Many of these complaints concern public roads or private communal roads. They arise from, for instance, disputes between neighbours or dissatisfaction with an order by a municipality to maintain or provide access to a private communal road. Other complaints are from citizens who have problems with public digital self-service solutions.

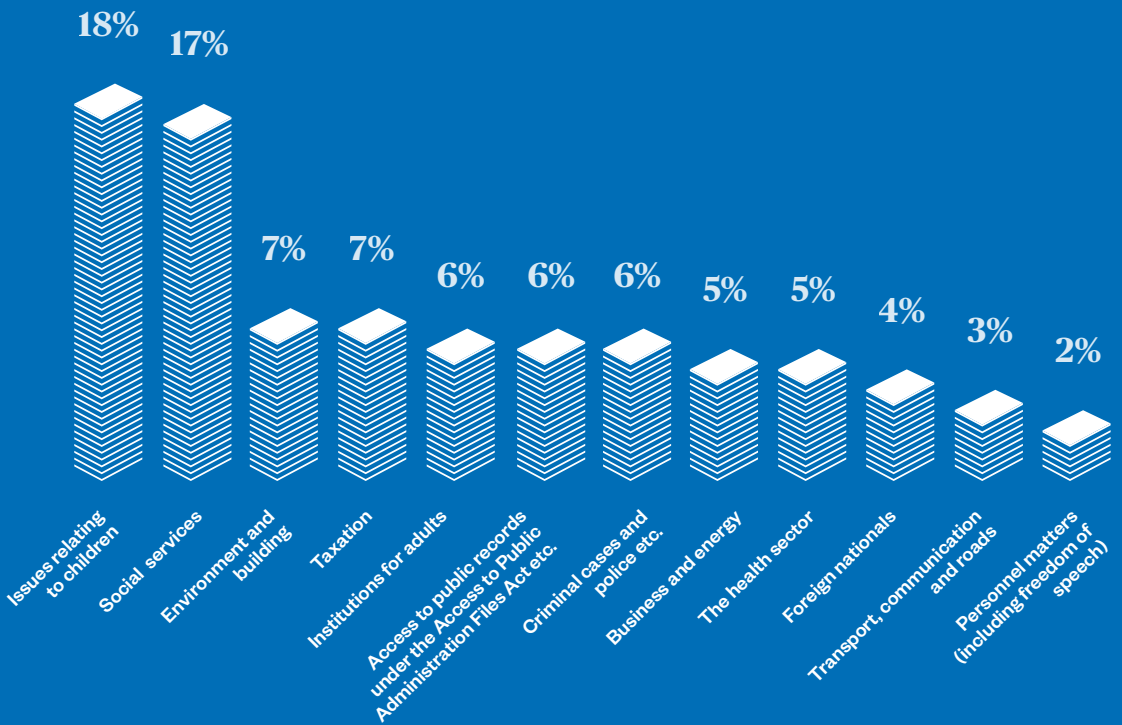
### Personnel matters (including freedom of speech)

The subject matter of these complaints is dissatisfaction on the part of public employees with a negative reaction from their employer – such as dismissal, a warning or a reprimand. Other complaints concern public employees' freedom of speech.



## Complaint cases

Selected subject areas of complaints as percentages of all complaints received by the Ombudsman in 2025



## Free legal aid in case on access to files

The Prosecution Service refused to give a journalist full access to files regarding the indictment against a former head of the Danish Defence Intelligence Service and a former Minister for Defence. In support of his request for access, the journalist had referred to two Supreme Court decisions in which the Court had stated that the indictment files could be read aloud in open court during the trial hearing of the criminal cases. The grounds for the refusal were partly that the indictments in the two cases had been withdrawn and the charges revoked, partly that the Supreme Court's decisions did not imply that full extended openness should be given.

In the Ombudsman's opinion, the issue of the journalist's potential right to full disclosure of the indictments should be resolved by the courts of law. This should be seen in the context that, among other things, the courts of law had processed other cases on access to files in the set of related cases and that the Appeals Permission Board had

granted permission to the Supreme Court to consider one more case. The Ombudsman therefore recommended that the journalist be granted free legal aid to bring the rejection of access before the courts if he wished to do so.

The journalist asked for and was granted free legal aid.

*News item 21 August: The Ombudsman to recommend free legal aid in case on access to indictments against former head of Defence Intelligence Service and former Minister for Defence (published at [www.en.ombudsmanden.dk](http://www.en.ombudsmanden.dk))*

› **In the Ombudsman's opinion, the issue of disclosure of the indictments should be resolved by the courts of law.**

## An inmate's fine was revoked following a letter from the Ombudsman

In some cases, the Ombudsman can help citizens with their case by for instance asking the authority to look at new information or objections from the citizen or to enlarge upon the grounds for a decision. This happened for instance in a case where an inmate complained to the Ombudsman about a fine that the inmate had been given as a disciplinary punishment for being in a room in the prison that the prison did not think he was allowed to be in.

The Ombudsman asked the authority to explain among other things which rules the inmate had failed to observe and whether the inmate had been informed of the rules. Following a new review of the case, the Danish Prison Service reached the conclusion that the inmate could not be given a disciplinary punishment and therefore withdrew the fine.

## Forwarding to authorities helped citizens in social services cases

In 2025, the Ombudsman received over one thousand complaints regarding social services. Some of the cases were solved by the Ombudsman forwarding the cases to the authorities and asking them to look at their decisions again.

### Had resigned from full-time job

A municipality granted a citizen compensation for loss of earnings for the part-time job of 20 hours a week that the citizen had before she resigned in order to take care of her child, who had a functional disability. Initially, the National Social Appeals Board upheld the municipality's decision.

In her complaint to the Ombudsman, the complainant cited that she had previously had a full-time job, which she had resigned in favour of a part-time job in order to take care of her child. The citizen was therefore of the opinion that she should really be compensated for the loss of her full-time job.

The Ombudsman forwarded the complaint to the National Social Appeals Board and asked the Board to consider the citizen's arguments. The National Social Appeals Board re-assessed the case and granted the citizen compensation for loss of earnings for the full-time job.

### Son was removed as party representative

A son complained that a municipality, without giving any detailed reason, had withdrawn his right to act as a party representative for his mother in connection with the decision in a case regarding granting support for an electric vehicle, even though the son had represented the mother in the dialogue with the municipality throughout the processing of the case and acted as interpreter.

The municipality's withdrawal meant that the municipality's decision in the case was not sent to the son. And when he appealed the decision, the municipality rejected the appeal on the grounds that it had been submitted too late.

With basis in the Ombudsman's forwarding of the case, the National Social Appeals Board found it to be an error that the Board had not considered the municipality's decision to withdraw the son's right to act as a party representative for his mother without giving any detailed reason. The National Social Appeals Board found that the son had been a party representative during the municipality's processing of the case and that the appeal deadline had been observed. As a consequence, the municipality had to look again at the case on a grant for support on the basis of the son's appeal.

› **The municipality's withdrawal meant that the municipality's decision in the case was not sent to the son. And when he appealed the decision, the municipality rejected the appeal as submitted too late.**

## Power supply company included in the Ombudsman's jurisdiction

The Ombudsman received a complaint from a citizen about a partial refusal of a request for access to files from Hillerød Forsyning, a power supply company partly owned by Hillerød Municipality. This gave the Ombudsman cause to determine that Hillerød Forsyning and its subsidiary Hillerød Service are included under his jurisdiction to the same extent that they are included under the rules of the Access to Public Administration Files Act.

It is common practice that the Ombudsman determines that publicly owned companies included under Section 4(1) of the Access to Public Administration Files Act are included under his jurisdiction. There is legal authority to do so in Section 7(4) of the Parliamentary Ombudsman Act.

## Ministry made several errors in case on access to environmental information

The Ministry of Environment and Gender Equality had stated to a daily newspaper that some of Denmark's neighbouring countries allowed larger mixing zones than Denmark did. Mixing zones are aquatic areas where the level of waste water is allowed to exceed the environmental standards. A lawyer for an NGO asked for access to the Ministry's documentation for the so-called neighbour check-up that the statement was based on.

In the Ombudsman's opinion, the Ministry's delimitation of the request for access to solely include one single file with anonymised data was too narrow. The Ministry should have ensured that it had understood the request correctly or clearly have described its delimitation in the decision.

In addition, the Ministry had refused to disclose information obtained from the neighbouring countries with reference to Section 13(1)(ii) of the Access to Public Administration Files Act of 1985 on protection of essential regards for Denmark's foreign policy interests. The Ministry had done so without examining whether the information was already in the public domain or accessible via access to files requests in the country they originated in and without obtaining a statement from the relevant country. The Ombudsman did not find that there were grounds for deviating from these general conditions for exempting information according to the provision. Overall, he was of the opinion that the Ministry's processing of the case was criticisable.

› **The Ministry should have ensured that it had understood the request correctly or clearly have described its delimitation.**

## The Ministry of Foreign Affairs delimited request for access too narrowly

A journalist had asked the Ministry of Foreign Affairs for access to 'the final internal documents (not drafts) concerning the notification in case C 1965'. The Ministry of Foreign Affairs delimited the request to only include final internal documents to which significance had been attributed in the decision to create the relevant case, C 1965, on suspicion of misuse of financial support in Ukraine.

The Ombudsman was of the opinion that the Ministry of Foreign Affairs had adopted a too narrow

understanding of the journalist's request, and that this resulted in the Ministry not having considered a number of documents that had to be considered as included in the request. The Ombudsman recommended that the Ministry of Foreign Affairs reopen the case. In connection with its renewed processing of the case, the Ministry identified an additional number of documents that the Ministry now believed to be included in the request for access to files. This applied to, among others, some documents that the Ombudsman had pointed out to the Ministry.

## Children's contact with the Children's Division

The Ombudsman's Children's Division is regularly contacted by children who need help or are in a situation they find difficult to deal with. In cases like that, the Children's Division will contact the relevant authorities and ensure that the authorities become aware of the children's situation.

### Move to another unit

A 16-year-old boy was placed in a secure residential institution where he was afraid of the other young people, who he stated threatened him and wanted him to keep drugs for them, among other things. He was too afraid to tell the staff about the threats. He said that – if he was to remain in the institution – it was important that he be moved to another unit in the institution. The Children's Division contacted the municipality, and the boy was moved to another unit in the institution with young people in the same target group as the boy.

### New home for 17-year-old girl

A 17-year-old girl complained to the Ombudsman about the municipality's case processing time. The girl had been placed at a boarding school

where she would finish the 10th grade one and a half months later, after which she could not remain at the boarding school. The girl was worried about where she was to live when she finished boarding school. The Children's Division contacted the municipality that was working on finding a new place for the girl to stay. The municipality subsequently informed the Children's Division that a new home had been found for the girl and that she was happy with the solution.

### Where to stay?

A 15-year-old girl contacted the Children's Division and told the case officers that she was to be placed outside the home but that the municipality had not found a place for her to stay. At the time, the girl was staying with a friend's family. The Children's Division contacted the municipality and was informed that the girl had been placed with the friend's family as a temporary solution and that the municipality was aware that the girl was in an urgent situation. Within two weeks, the municipality had found a place for the girl to stay.

## Forwarding complaints led to more access

In a number of cases, the Ombudsman's forwarding of complaints to the authorities has helped citizens and journalists achieve a better result in cases concerning access to files.

### Access to files on test centre

The Ombudsman received two complaints from, respectively, a journalist and another citizen who had received rejections to their requests for access to files on establishment of a test centre for large wind turbines. The rejections were made according to the Environmental Information Act, and the grounds were that the files were part of a case concerning legislation.

However, the Environmental Information Act contains a rule that obligates authorities to make a concrete balancing of the public's interest in getting access against the interests safeguarded by refusing to disclose the information.

The Ombudsman forwarded the complaints to the Ministry of Urban, Rural and Ecclesiastical Affairs so the Ministry could have the opportunity to elaborate on its balancing of interests. The Ministry referred both cases back to the Planning and Rural Districts Authority, which subsequently gave access to a large number of documents and a large amount of information.

### Would only process requests for access biannually

The Patient Safety Authority decided to compile a citizen's continuous requests for access and only process them biannually. As grounds for its decision, the Authority referred to, among other things, an overview in the Guide for Authorities on the Ombudsman's website about authorities' possibility of restricting contact with an individual citizen.

After the Ombudsman entered the case, the Authority decided to change its decision and from then on process citizens' requests for access when they are received. The Ombudsman concluded his investigation of the case but made the Authority aware that the practice described in the

overview in the Guide for Authorities does not include cases on access to files and that the Access to Public Administration Files Act does not allow restricting contact with a citizen in such cases.

### Extended openness in Afghanistan and Iraq documents

The Prime Minister's Office gave a citizen a partial rejection of access to a number of documents on Iraq and Afghanistan with reference to, among other things, the ministerial advice and assistance provision in the Access to Public Administration Files Act. The documents concerned, among other things, speech points for the Prime Minister, background information and diplomatic briefings from the 2000s in particular.

In the complaint to the Ombudsman, the citizen pointed out that the documents were historic and had no connection to existing political administrations or current matters of security or foreign policy.

The Ombudsman asked the Prime Minister's Office for a statement, and, in that connection, particularly asked the Office to account for its deliberations on giving access according to the principle of extended openness, considering the time that had passed since the political decision process – which the ministerial advice and assistance provision aims to protect – had been concluded. The Prime Minister's Office then decided to reopen the case and disclose additional material pursuant to the principle of extended openness.

### Changed long-running practice

The Region of Southern Denmark rejected a citizen's request for access to information about himself – so-called own-access – in his girlfriend's patient record. The Region referred to it not having legal authority to look up in the girlfriend's record without her consent. The Ombudsman forwarded the complaint to the Region, which changed its conception of law and formally processed the case. The Region then changed its general practice in the field.

## The Ministry of Justice disclosed more information after being asked for a statement

A journalist complained to the Ombudsman that he had received a partial refusal for access to documents regarding two bills on property assessment. The Ombudsman asked the Ministry of Justice to indicate whether some of the exempted documents contained information on final internal expert assessments that were comprised by the extraction duty pursuant to Section 29 of the Access to Public Administration Files Act.

After dialogue with the Ministry of Taxation, the Ministry of Justice decided to reopen the case and subsequently made a new decision, where a number of documents were disclosed to the journalist in accordance with Section 29 of the Access to Public Administration Files Act. In addition, the Ministry disclosed some information pursuant to the principle of extended openness, with reference, among other things, to the age of the information.



# **Own-initiative investigations**

**What:** Opening investigations on his own initiative is a high priority for the Ombudsman.

The Ombudsman may open the following types of investigation on his own initiative:

- investigations of specific cases
- general investigations of an authority's processing of cases

The Ombudsman mainly opens own-initiative investigations of themes and within areas with one or more of the following characteristics:

- There is an aspect of fundamental public importance.
- Serious or significant errors may have been made.
- They concern matters which raise special issues in relation to citizens' legal rights or which are otherwise of great significance to citizens.

**Why:** A main objective is to identify recurring errors made by authorities. This can have a great impact on authorities' case processing, thus helping a large number of citizens at once.

The focus is not only on errors that the authority may already have made – but also on preventing errors being made in the first place.

In addition, the Ombudsman opens investigations on his own initiative of specific cases of a more one-off nature.

**From where:** Specific complaint cases or monitoring visits may give rise to suspicion of recurring errors etc. and be the launch pad for an own-initiative investigation. Media coverage of a case may also cause the Ombudsman to open an investigation on his own initiative. The Ombudsman monitors both local and national media.

Further, external parties – such as professional committees for practising lawyers or accountants or interest groups – can be useful sources of knowledge about recurring errors etc.

In addition, the Ombudsman chooses some general themes each year for the institution's monitoring activities in relation to adults and children and for its Taxation Division.

**How:** Own-initiative investigations have the common denominator that the focus is usually expanded beyond specific problems to a more general level, with emphasis on any general and recurring errors or problems and on how the authorities involved can handle and rectify them.

In some own-initiative investigations, the Ombudsman reviews a number of specific cases from an authority. In others, the Ombudsman asks an authority for a statement about, for instance, its administration, its interpretation of the law, its practice or its processing times within a specific area.

The Ombudsman is working on an ongoing basis on a variety of own-initiative investigations where he considers, based on, for instance, specific complaint cases, legislative changes or media coverage, whether there is a basis for further investigation.

In some cases, the Ombudsman's own investigation leads to the assessment that there is no cause to contact the authorities involved, and the case is closed without a full Ombudsman investigation. The Ombudsman may also decide to close a case without a full investigation after contacting the authorities.

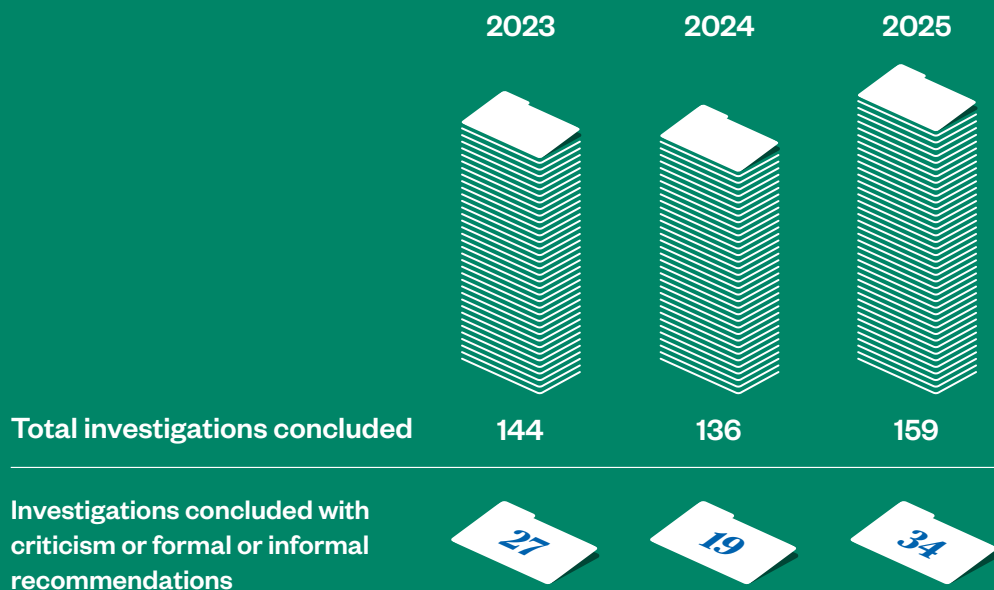
## Tax authorities should be available on the telephone

Every year when the Tax Agency opens for access to the tax assessment notices, the phone lines in the Customs and Tax Administration are busy. The Ombudsman investigated the Tax Agency's, the Property Assessment Agency's and the Debt Collection Agency's telephone service during the period surrounding the opening of access to the tax assessment notices in 2025. Specifications from the Agencies showed a very considerable number of cancelled calls – a total of around 1.8 million calls – where citizens neither came through on the phone nor got in a call queue.

The many cancelled telephone calls caused the Ombudsman to state that the Agencies should still focus on arranging matters so as to be available for telephone calls – also in periods of peak demand when many citizens are in need of guidance. Not least out of consideration for citizens who find it difficult to use the Agencies' digital guidance solutions.

*News item 16 December: Tax authorities should still focus on being available on the telephone (published at [www.en.ombudsmanden.dk](http://www.en.ombudsmanden.dk))*

### Own-initiative investigations



## Too long waiting time for transfer to treatment

As a rule, convicted sexual offenders must initially serve their sentence in Herstedvester Prison's assessment and observation unit because it is to be determined there if the convicted person needs – and is motivated for – sexological treatment, for example.

However, the Ombudsman's investigation of the waiting time for transfer to the assessment and observation unit showed that the waiting time was long and that many of the convicted persons had served a relatively large part of their sentence before they came to the assessment unit. This could mean that the purpose of the assessment programme was lost because then the inmates did not have time to be offered treatment or to benefit from the treatment. The long waiting time could also have a bearing on the convicted persons' leave plans and in the end their possibility for conditional parole.

Furthermore, the Ombudsman found that it was only in connection with the Ombudsman's investigation that the Danish Prison Service took action to ensure that records were made which allowed the Service to follow the development in the waiting time on an ongoing basis.

On that basis, the Ombudsman criticised the Danish Prison Service in the case and, at the same time, asked to be notified of the result of the Danish Prison Service's deliberations about initiatives that could reduce the waiting time.

*News item 1 July: Convicted sexual offenders must wait too long for treatment (published at [www.en.ombudsmanden.dk](http://www.en.ombudsmanden.dk))*

## Digitalisation: Robotic solution in Property Assessment Agency led to errors

The Property Assessment Agency had used a robot that had erroneously removed assessments or income years from the so-called repayment scheme (*tilbagebetalingsordning*) for property owners. This had happened automatically and thus without manual case processing.

In the Ombudsman's opinion, it was unfortunate that the problem had not been uncovered – either during the initial analysis of the case steps that were being automated or at the later quality control of the robot.

The Ombudsman also expressed some general reflections on the importance of the authorities, in their work with digitalisation, having an overview of the information that is to form the basis of an IT system. This is especially the case with automated case processing, where the system directly depends on, for instance, the system's input data being sufficient and of the required quality.

## The new property assessments led to several investigations

In 2025, the Ombudsman carried out a number of general own-initiative investigations of issues with the new property assessments. The investigations were started based on, among other things, media coverage, received complaints or overviews of transitional problems with the new property assessments which the Ombudsman asked the Property Assessment Agency to draw up and send to him.

### Investigation on tax increase loans

At the end of 2024, for example, there was a lot of media coverage about the letters that the Property Assessment Agency sent to property owners about the so-called tax increase loans (*tillægslån*), which were given as a result of problems with calculating the new property tax rebates. The Ombudsman decided to look into the guidance from the Property Assessment Agency, which informed the Ombudsman of its deliberations on the timing and the contents of the letters sent out.

In connection with the investigation, the Ombudsman also asked the Property Assessment Agency for an overview of known problems with the transition to the new property assessment system which could affect property owners. An overview that formed the basis of several Ombudsman investigations.

### Lack of correct basis of taxation

Two investigations in 2025 concerned property owners who could not pay property taxes because the Property Assessment Agency could not create the correct basis of taxation for the owners' properties. In one of the cases, there were no values for the so-called tax stop (*skattestop*) and tax ceiling (*skatteloft*), which are necessary in order to calculate the tax rebate. In the other case, no preliminary property assessments could be made for 2022.

The Ombudsman asked about the Property Assessment Agency's deliberations on the consequences for the affected property owners. In both cases, the Ombudsman asked the Property Assessment Agency to return with new information in the spring of 2026.

### Explanation of property assessments

In the autumn of 2025, the Ombudsman started another investigation of the assessment of residential properties. Based on media coverage and a specific complaint case, he started an investigation of the property owners' possibility of getting an explanation of their property assessment. The Ombudsman asked the Property Assessment Agency to state, among other things, whether the Agency would generally for the public property assessments be able to explain the underlying calculations etc. for the individual property.

The Ombudsman also asked the Property Assessment Agency for an overview of known transitional problems for the assessment of commercial properties etc. Based on that overview, the Ombudsman started an investigation in the autumn concerning assessments of shared areas – an issue that was also subject to media coverage in 2025. The Ombudsman asked the Agency for a status update on the Agency's work with quality-assuring and changing preliminary assessments of shared areas etc.

*News item 6 October: The Ombudsman looks at the Property Assessment Agency's possibilities for explaining calculations behind property assessments (published at [www.en.ombudsmanden.dk](http://www.en.ombudsmanden.dk))*

## The Ombudsman focuses on healthcare staff's freedom of speech

After a violent episode at Amager and Hvidovre Hospital, a manager wrote in an e-mail to the staff in the hospital unit that management would like the staff to refer to the ward management if journalists asked about the case.

The Ombudsman started a case about this with the Capital Region of Denmark and agreed with the Region's subsequent regret that the wording could be construed as a ban on making statements to the press or an order to present any criticism to management before making a statement to the press. The Region stated that, in future, the hospital would pay attention to the wording of guidelines on help in connection with press contact.

### **Guide could be construed as a restriction**

The Ombudsman started a case on the Capital Region of Denmark's Psychiatry Service's guide 'Good to know about social media', which was aimed at the staff. The Capital Region of Denmark regretted to the Ombudsman that wordings

in the guide could be construed as a restriction of the staff's freedom of speech with reference to a duty of loyalty between the staff and the Capital Region of Denmark's Psychiatry Service as an employer.

The Ombudsman agreed with the Region's regret of the wordings about loyalty. The Region subsequently decided to remove the guide.

The Capital Region of Denmark also checked whether other units in the Region had similar guides on staff's use of social media with wordings that could be construed as a restriction of the staff's freedom of speech. The Region stated that another two guides had this kind of wording and that they would be revised. In future, the Region would make sure that no more guides would be made with wording that restricts or could be construed as a restriction of staff's freedom of speech.

## Investigations of case processing times

### Criticism of the Psychiatric Patients' Complaints Board's processing times in cases about force

An investigation of the Psychiatric Patients' Complaints Board's case processing times showed, among other things, that the Board in 2024 and the first quarter of 2025 had only concluded less than five per cent of its complaint cases about for instance forced admission within the deadline of two weeks within which such cases are normally required to have been concluded according to the explanatory notes to the Mental Health Act.

The right to complain to the Board must be used before the patient can bring the lawfulness of the deprivation of liberty before the courts. For this

reason too, the case processing time is of great importance to the patient.

The Ombudsman expressed criticism of the Board and found it concerning that the Ministry of the Interior and Health was not able to say when the case processing times could be expected to be reduced to a satisfactory level.

*News item 17 November: The Psychiatric Patients' Complaints Board has criticisable processing times in cases about force (published at [www.en.ombudsmanden.dk](http://www.en.ombudsmanden.dk))*

### The Supervisory Board of Psychological Practice's processing times in authorisation cases

In 2025, the Ombudsman followed up on a previous investigation of the Supervisory Board of Psychological Practice's processing times in authorisation cases. At the follow-up, the Ombudsman found that it was positive that the Board had implemented several initiatives in order to reduce the case processing times and had made decisions in far more cases in 2024 than in 2023. The number of pending cases was still high, but the Board had also received significantly more applications, and the average case processing time in concluded cases had been reduced. In addition, it had been decided that the Supervisory Board of Psychological Practice would be closed down in 2026.

Overall, the Ombudsman did not find grounds for taking further action in relation to the Board, but he indicated that he would continue to stay informed of the development in the field.

➤ **The Board had implemented several initiatives in order to reduce the case processing times.**

## Still long waiting times for victims of crime

In December 2024, the Ombudsman stated that the case processing times of the Criminal Injuries Compensation Board in general were far too long, and he therefore asked the Ministry of Justice and the Department of Civil Affairs for additional information about the case processing times after six months.

After the authorities had informed the Ombudsman of the status, he found that there was still reason to look at the case processing times with great severity.

Based on the information from the Ministry of Justice that various initiatives had been launched in order to simplify and facilitate the case processing in the area, the Ombudsman found that the initiatives alone were not going to solve the problems with the long case processing times. On the

contrary, there were no grounds on the present basis to assume that the case processing times could be reduced – but rather that they would increase – towards the time when a new model in the victim compensation area can be implemented.

This was concerning in the Ombudsman's opinion. And therefore, the Ombudsman announced that, in the beginning of 2026, he would ask the authorities to give an account of the development of the case processing times and the number of pending cases in all of 2025.

› **The initiatives alone were not going to solve the problems with the long case processing times.**

## The Agency of Family Law's processing times in guardianship cases

After having received several complaints about the Agency of Family Law's processing times in specific cases on guardianship, the Parliamentary Ombudsman initiated an investigation of the processing times in guardianship cases. The investigation led to the Ombudsman stating that, in his opinion, there was reason to look with great severity at the development in the Agency of Family Law's processing times in guardianship cases.

The Agency of Family Law had implemented various initiatives in order to reduce the processing times in guardianship cases. In addition, a legislative bill with a number of amendments to the

Guardianship Act with the purpose of reducing the Agency of Family Law's case processing times came into force in July 2025.

On that basis, the Ombudsman asked the Ministry of Social Affairs and Housing to send him a new account of the development in the Agency of Family Law's processing times in all guardianship cases in March 2026 at the latest.

2025

## Excessively long processing times in visa appeal cases

On the basis of several complaints, the Ombudsman initiated a general investigation of the Immigration Service's processing times in the visa cases that the Service processes as an appeals body.

The investigation showed that the average case processing time had increased from approx. nine months in the beginning of 2024 to 15-16 months in the first half of 2025.

It was the Ombudsman's opinion that a processing time of one year or more in visa appeal cases

generally was to be considered excessively long, considering the applications' purpose and the nature of the cases, among other things.

The Ombudsman expects to ask the Immigration Service for a new status update after the close of the first half of 2026.

› **The average case processing time had increased from approx. nine to 15-16 months.**

## Criticisable to suspend weapons cases for almost three years

Having processed several cases about the processing times of the Administrative Centre of the Police in weapons cases, the Ombudsman initiated a general investigation of the police's processing times regarding weapons cases.

The weapons cases had been suspended while the authorities considered whether they could retrieve information from a special database in order to process the cases.

It did not give the Ombudsman cause for comments that the authorities suspended the processing of weapons cases for a period in order to assess questions about including relevant information from the database. But the Ombudsman found it criticisable that the weapons cases were suspended for almost three years. The long period of suspension was first and foremost because the National Police had not sufficiently prioritised the clarifying of the case processing.

## Cases about debt cancellation are taking too long

In February 2025, the Ombudsman initiated a general investigation of the Debt Collection Agency's processing times in cases about cancellation of debt to the public sector.

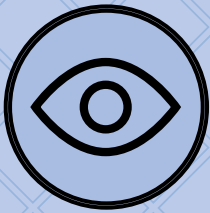
Cancellation is a possibility for debtors who have no real prospect of being able to pay their debt to achieve a lasting financial improvement and be able to move on.

The figures from the Debt Collection Agency showed that the average case processing time in 2024 had been reduced to approx. eight months, which, however, was still too long according to the

Agency. The Debt Collection Agency informed of several implemented initiatives in the area, for instance injection of resources and strengthened guidance efforts. The Agency said that it was working on reducing the case processing times further.

The Ombudsman agreed with the Debt Collection Agency that the case processing times in 2024 were too long. He emphasised the cases' personal and financial importance for the individual.

The Ombudsman asked the Debt Collection Agency for new figures in the beginning of 2026.



# Monitoring activities

**Where:** The Ombudsman carries out monitoring visits to places where there is a special need to ensure that citizens are treated with dignity and consideration and in accordance with their rights by the authorities – for instance because the citizens are deprived of their liberty or otherwise in a vulnerable position.

Monitoring visits are made to a number of public and private institutions etc., such as

- Institutions under the Danish Prison Service
- departments of psychiatry
- social residential facilities
- residential institutions for children and young people

In addition, the Ombudsman monitors

- forced deportations of foreign nationals
- forced deportations organised by other EU member states at the request of the European Border and Coast Guard Agency, Frontex

Finally, the Ombudsman monitors the physical accessibility of public buildings, such as educational establishments or health institutions, to persons with disabilities.

**Why:** The Ombudsman's monitoring obligations follow from the Ombudsman Act and from the rules governing the special responsibilities which the Ombudsman has been assigned:

- The Ombudsman carries out monitoring visits in accordance with Section 18 of the Ombudsman Act, especially to institutions where people are deprived of their liberty.
- The Ombudsman has been designated 'National Preventive Mechanism' (NPM) under the Optional Protocol to the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT). The task is carried out in collaboration with DIGNITY – Danish Institute Against Torture and the Danish Institute for Human Rights (IMR), which contribute with medical and human rights expertise.
- The Ombudsman has a special responsibility to protect the rights of children under the UN Convention on the Rights of the Child etc.

- The Ombudsman has been appointed to monitor forced deportations.
- The Ombudsman monitors developments regarding equal treatment of persons with disabilities at the request of Parliament.

**How:** Each year, the Ombudsman chooses one or more themes for the year's monitoring visits to institutions etc. for adults and children, respectively. A large proportion of the monitoring visits carried out during the year are to institutions etc. where one of the themes is relevant.

Monitoring visits to institutions etc. are physical visits by a visiting team, who speak with residents, inmates, patients etc., staff and the management and look at the physical environment.

The monitoring of a forced deportation involves a member of the Ombudsman's staff being present during the whole or part of the deportation. In addition, the Ombudsman's monitoring of forced deportations includes a review of the case files of a number of the deportation cases concluded during the preceding year.

The Ombudsman may make recommendations to the institutions etc. visited and to the responsible authorities. Issues from the visits may also be discussed with the responsible authorities or dealt with in own-initiative investigations, and every year, the Ombudsman publishes a separate report on the visits relating to each of the themes chosen for visits carried out during the preceding year to institutions etc. for adults and children, respectively.

**Who:** Monitoring visits are carried out by Ombudsman staff, in many cases with participation of external collaborative partners or consultants. Depending on the type of monitoring visit, the Ombudsman collaborates with

- medical doctors from DIGNITY – Danish Institute Against Torture
- human rights experts from the Danish Institute for Human Rights
- two accessibility consultants who both have a disability

## Where did we go in 2025?



### Monitoring visits – adults



10 institutions under the Danish Prison Service, of which 5 in Greenland



9 police authorities, of which 6 in Greenland



9 psychiatric departments, of which 8 departments of forensic psychiatry

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4 visits to institutions for adults and 1 visit to an institution for children were unannounced.

> Read about all visits at [www.en.ombudsmanden.dk/visits\\_adults](http://www.en.ombudsmanden.dk/visits_adults)



## Monitoring visits – children



9 institutions under the  
Danish Prison Service



1 secure residential  
institution

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> Read about all visits at  
[www.en.ombudsmanden.dk/visits\\_children](http://www.en.ombudsmanden.dk/visits_children)

## The Ombudsman's monitoring visits in Greenland

The Parliamentary Ombudsman monitors conditions for people who are deprived of their liberty in correctional institutions and detention facilities in Greenland. On that background, the Ombudsman visited several correctional institutions and detention facilities in August and September 2025. The last time the Ombudsman carried out monitoring visits in Greenland was in 2021.

Three of the Ombudsman's visits in 2025 concerned municipal bailiffs. Municipal bailiffs are civilians without police training who have been appointed to help the police in settlements where there is no police station. In some cases, municipal bailiffs have the power to detain citizens in a detention facility in the settlement.

The monitoring visits took place in

- The Correctional Institution in Ilulissat
- The Correctional Institution in Nuuk
- The Correctional Institution in Tasiilaq
- The Correctional Institution in Qaqortoq
- The Correctional Institution in Aasiaat
- The police station in Ilulissat (with detention facility)
- The police station in Tasiilaq (with detention facility)
- The police station in Nuuk (with detention facility)
- The municipal bailiff in Oqaatsut (without detention facility)
- The municipal bailiff in Kuummiit (with detention facility)
- The municipal bailiff in Kulusuk (with detention facility)

The institutions are spread out at great distances along the Greenlandic coast, and therefore two of the visits – the visits to the correctional institutions in Qaqortoq and Aasiaat – were carried out virtually. The visit to the municipal bailiff in Oqaatsut had to be carried out over the telephone as it was not possible for the visiting team to reach the settlement.

During the visits, the Ombudsman focused on use of force and other interventions and restrictions, relations, health-related conditions and – in the correctional institutions – occupation, education and leisure time. In the detention facilities, the Ombudsman also looked at the safety of detainees. In addition, there was focus on overcrowding and the consequences thereof.

During the visits, the visiting team spoke with the institutions' local management, staff and inmates and also looked at the police's detention cells and at the physical environment in three of the correctional institutions. The visiting teams spoke with a total of 29 inmates and 21 staff members. Lastly, a meeting was held with the Headquarters of Greenland's Prison and Probation Service and the Commissioner of Police in Greenland, respectively.

The monitoring visits were carried out in cooperation with the Danish Institute for Human Rights and DIGNITY – Danish Institute Against Torture.

The Ombudsman's closing letters in all monitoring cases can be read (in Danish) on the Ombudsman's website.



## Themes

### Theme in 2025 – adults

#### The forensic psychiatric sector

The theme for the Ombudsman's monitoring visits (adults) in 2025 was the forensic psychiatric sector.

As part of the theme, the Ombudsman visited selected bed units in all of Denmark's eight departments of forensic psychiatry. During the visits, the Ombudsman especially focused on patients with treatment orders and placement orders and on the use of forced immobilisation.

#### Focus areas

During the thematic visits in 2025, the visiting teams focused, among other things, on the following in relation to people with treatment orders and placement orders in departments of forensic psychiatry:

- treatment plans
- temporary leave
- discharge agreements and coordination plans
- cooperation with the municipalities upon discharge
- the duration of the hospitalisations

In addition to the departments of forensic psychiatry's work on generally preventing and reducing the use of force, the visiting teams focused, among other things, on the following in connection with forced immobilisations:

- completion of protocols on use of force
- the permanent guards' records
- belt inspections
- the duration of the forced immobilisations
- follow-up interviews

#### Examples of recommendations

In February 2026, the Ombudsman published a thematic report on the thematic visits in 2025. The thematic report summarises the main conclusions of the thematic visits and contains the Ombudsman's general recommendations based on the monitoring visits. The report can be found on the Ombudsman's website.

The Ombudsman generally recommended that departments of forensic psychiatry

- ensure that treatment plans, discharge agreements and coordination plans contain the information required under the applicable rules
- have increased focus on ensuring quick, smooth and solution-oriented dialogue with the municipalities in connection with discharge of patients
- ensure that the patient record contains comprehensive documentation that the grounds for a forced immobilisation are present for the duration of the immobilisation period
- ensure that use of force protocols are completed in accordance with the rules, including that the rules on the permanent guards' duty to keep records and on belt inspections are observed

#### Follow-up

The thematic report will be discussed with the Ministry of the Interior and Health and the Ministry of Justice, among others.

## Theme in 2025 – children

### Young people in the Danish Prison Service

The theme for the Ombudsman's monitoring visits (children) in 2025 was young people in the Danish Prison Service.

As part of the theme, the Ombudsman visited three state prisons and six local prisons, including the two institutions under the Danish Prison Service that are particularly aimed at young people.

### Focus areas

During the thematic visits in 2025, the visiting teams focused on

- use of force and observation and security cells
- solitary confinement and exclusion from association
- placement, association and other relations
- information about rights etc.
- education, occupation, leisure time and sector cooperation
- healthcare-related conditions

### Examples of recommendations

In connection with the visits, recommendations were given to the state and local prisons – for instance, the Ombudsman recommended that the institutions

- ensure that uniformed staff in the unit for young offenders know the rules that apply

to the treatment of young people placed in institutions under the Danish Prison Service

- organise the case processing so that both underage inmates and custodial parents can exercise the rights of a party, and in this connection ensure that custodial parents are informed and guided in a way that enables them to handle the underage person's interests and needs as legal party representatives
- ensure that on arrival of young inmates, a special treatment plan is drawn up as soon as possible, for example in the form of education and activation programmes for the young person in question
- ensure that records are made about permissions for young inmates' association with adults without the presence of staff, and that the records show the reasons why the association is deemed to be in accordance with the young person's interests

### Follow-up

In the course of 2026, a thematic report will be published, which summarises the main conclusions of the thematic visits. In addition, the thematic report will contain the Ombudsman's general recommendations based on the monitoring visits.

The thematic report will be discussed with relevant authorities in the sector.

> Read about themes at [www.en.ombudsmanden.dk/themes](http://www.en.ombudsmanden.dk/themes)

## Two cases opened after monitoring visit to Egely at ‘Socialcenter Lillebælt’

The Children’s Division carried out a monitoring visit to Egely at ‘Socialcenter Lillebælt’, a secure residential institution with a special secure unit. The monitoring visit led the Ombudsman to subsequently open two own-initiative cases.

One case concerns the special education programme at Egely. The case was opened because during the monitoring visit, the visiting team was informed, among other things, that education at Egely had been reduced for a period of time.

The other case concerns the staff situation at Egely and the consequences thereof in relation to the professional quality and pedagogical approach. The case was opened because the visiting team found out, among other things, that Egely used temporary staff extensively, and that the rules were not observed uniformly. The visiting team was also informed of a high number of physical force episodes, that some members of staff did not have sufficient knowledge of the rules on use of physical force, and that there was a lack of activities for the children and young people staying there.

## Nyborg Prison’s use of toilet cubicles for temporary confinement of inmates against their will

In connection with the Children’s Division’s monitoring visit to Nyborg Prison, the visiting team became aware of a practice where inmates were confined temporarily to a toilet cubicle. The confinement took place if the need for an emergency or risk-based cell search arose and no other places were available.

During the monitoring visit, the visiting team asked Nyborg Prison’s management about this practice.

Management replied that the practice described would not be used in future, and that instructions on this had now been given to the entire prison.

## The visiting conditions at Western Prison

In continuation of an unannounced monitoring visit to Western Prison, the Ombudsman opened an own-initiative investigation of the visiting conditions at the institution.

The Danish Prison Administration said that the Administration did not know if the inmates at Western Prison received the visits they were entitled to according to the rules. The lack of knowledge was because the Danish Prison Service did not have a sufficient data basis at their disposal to make this assessment.

Taking into consideration the number of inmates and the Danish Prison Service's staffing problems plus complaints from the inmates' spokespersons and relatives, there was however, according to the Administration, an indication that there were problems with ensuring regular visits for the inmates at Western Prison.

The Ombudsman found that the concern was justified. Among other things, it was therefore the Ombudsman's opinion that the Danish Prison Service should obtain a greater data basis so that it could be assessed if the rules about inmates' right to receive visits were being observed.

The Ombudsman also recommended that the Administration consider speeding up its follow-up on the previous work of a working group on visits from lawyers and relatives. The working group had recommended that the Danish Prison Service's data basis be optimised so that it would be possible to determine, among other things, the number of requests for visits and the reasons for cancellations.

Furthermore, the Ombudsman noted that Western Prison in the beginning of March 2025 implemented a new visiting model that allowed an additional 64 visits from relatives per month.

*News item 3 June: The Prison and Probation Service should obtain greater knowledge of inmates' access to visits at Western Prison (published at [www.en.ombudsmanden.dk](http://www.en.ombudsmanden.dk))*

› **A greater data basis should be obtained so that it could be assessed if the rules about inmates' right to receive visits were being observed.**

## Lack of activities in the evenings and on weekends at Western Prison

When the Children's Division was on a monitoring visit to Western Prison, the visiting team was informed that young inmates under 18 were alone in their cells from approx. 16:30, when dinner was served, until the next morning. On weekends, there were no activities for young inmates. The young inmates with whom the visiting team spoke during the visit said that they needed someone to talk to, among other things.

The Ombudsman recommended that Western Prison endeavour to ensure activities for young people or contact with the staff in the evenings during the week and generally on weekends.



## Monitoring visits to investigate accessibility for persons with disabilities

The Ombudsman monitors the accessibility of public buildings and their outside areas etc. for persons with disabilities.

During monitoring visits to investigate accessibility, the Ombudsman focuses on whether the requirements of the building regulations on accessibility for persons with disabilities have been met. The Ombudsman is assisted during the visits by two accessibility consultants who both have a disability.

### Theme

In 2025, the Ombudsman decided that in 2025 and the coming years, the theme for monitoring visits to investigate accessibility was to be the accessibility of citizen service centres. Focal points during the visits are the parking facilities and access areas for persons with disabilities, the design of toilets for persons with disabilities, information and signposting, and access to website information about the accessibility of the centres for persons with disabilities.

### Monitoring visits in 2025

In 2025, the Ombudsman carried out monitoring visits to three municipal citizen service centres: in Elsinore, Svendborg and Holbæk.

All three visits gave rise to several recommendations in relation to the Ombudsman's focal points. For instance, the Ombudsman recommended improvements to the parking facilities

for persons with disabilities of all three citizen service centres. In addition, several recommendations regarding the access areas or the design of toilets for persons with disabilities were given to the centres. For example, the Ombudsman recommended that the citizen service centre of Elsinore Municipality place markings on glass doors and other glass areas to ensure greater clarity for persons with poor eyesight and that the citizen service centre see that the doors to the toilet for persons with disabilities can be closed by wheelchair users without assistance. The Ombudsman's letters with all recommendations (in Danish) can be read on the Ombudsman's website.

The Ombudsman will continue the theme in 2026.

### Other cases

The Ombudsman was alerted by press coverage to a case concerning the access conditions to Lyngby Town Hall. The town hall had been renovated, and in this connection, Lyngby-Taarbæk Municipality had granted itself a dispensation from the requirements of the building regulations on accessibility for persons with disabilities. This had resulted, among other things, in challenges for wheelchair users wishing to access the town hall. After the Ombudsman took up the case concerning the dispensation, the Municipality reopened the case, and the municipal council subsequently allocated funds for upgrading lifts in the town hall to comply with the building regulations.

› Read more at

[www.en.ombudsmanden.dk/equal\\_treatment\\_of\\_persons\\_with\\_disabilities](http://www.en.ombudsmanden.dk/equal_treatment_of_persons_with_disabilities)



## Monitoring of forced deportations

### Participation in forced deportations

The Ombudsman monitors forced deportations of foreign nationals, among other things by Ombudsman staff being present during the whole or part of a number of deportations. In 2025, a member of the Ombudsman's staff was present at ten deportations carried out by the Danish authorities and at two Frontex operations.

The Ombudsman generally found that the foreign nationals were treated with respect and in accordance with their fundamental rights. The Ombudsman expressed no criticism in any of the cases where a member of the Ombudsman's staff was present at the deportation.

### Annual review of concluded cases

In addition to a member of the Ombudsman's staff being present during the whole or part of a number of deportations, the Ombudsman's monitoring of forced deportations includes a review of the case files of some of the deportation cases concluded during the preceding year.

In 2025, the Ombudsman reviewed the case files of 30 deportation cases which had been concluded by the authorities in 2024 – three cases involving use of force and 27 cases where no force was used. None of the 30 cases reviewed gave the Ombudsman cause for criticism.

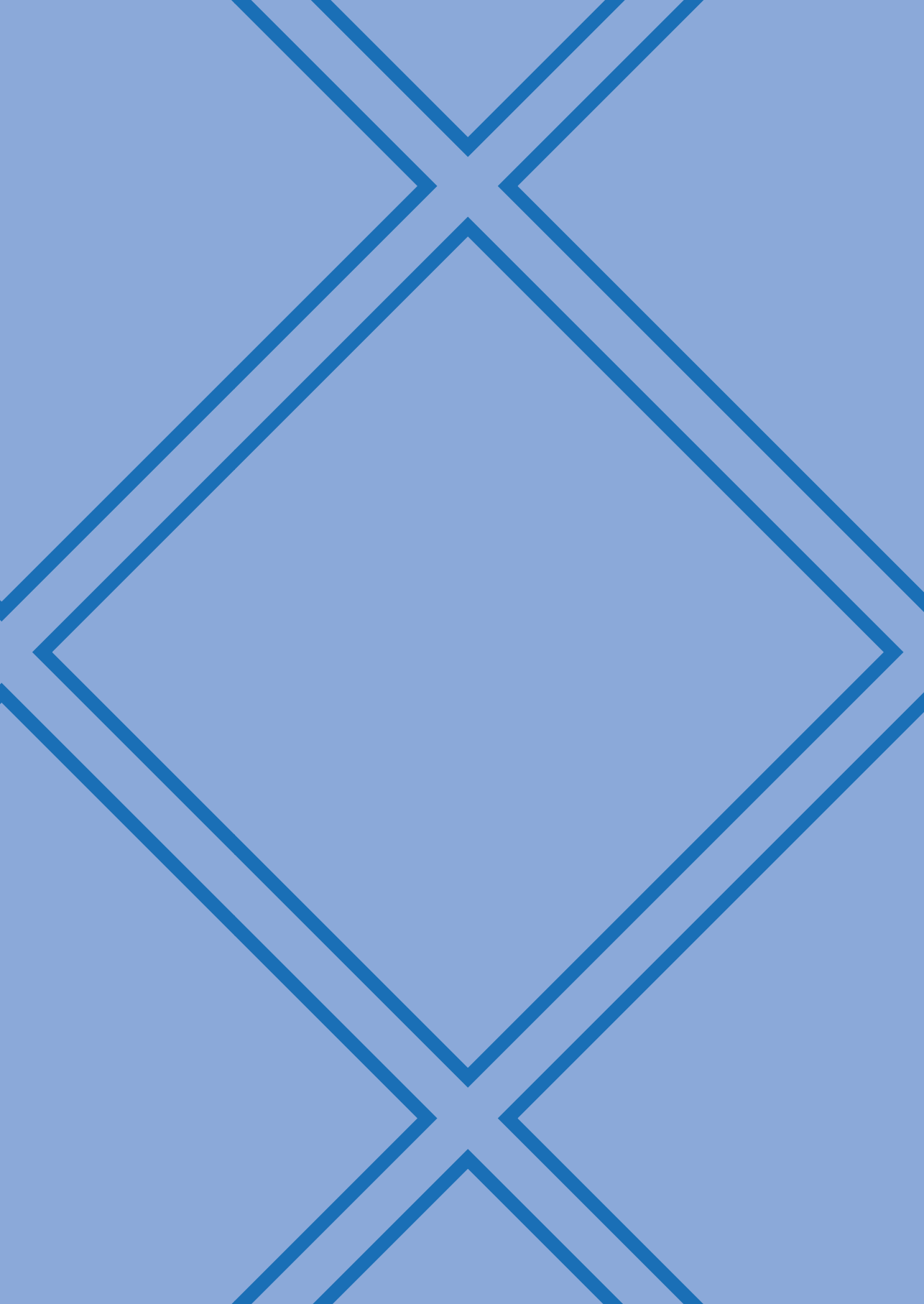
> Read more at [www.en.ombudsmanden.dk/forced\\_deportations](http://www.en.ombudsmanden.dk/forced_deportations)








# Articles



# The Ombudsman on tour

**By touring Denmark's municipalities and visiting organisations that are working for society's most vulnerable, Christian Britten Lundblad aims at making the Ombudsman Office more visible and accessible to citizens all over the country.**



Marie Nyborg Kvist, Legal Advisor  
Mai Emilie Gori, Head of Unit



The Ombudsman must be part of ensuring the legal rights of citizens in their encounter with the authorities. Among other things, he does so by processing complaints, conducting monitoring visits and initiating cases that can have great impact in relation to the authorities' case processing.

In order for the Ombudsman to live up to his purpose, the citizens around the country must know that he exists. Just as important is it that the Ombudsman hears and knows about the challenges that may arise in the encounter between citizens and the public administration.

This is the reason that Christian Britten Lundblad, since his accession in May 2025, has frequently left his office at Gammeltorv in central Copenhagen and travelled around the country to spread knowledge of the Ombudsman Office's work. In that way, he seeks out actors within the public administration and NGOs with a broad and direct contact with citizens in order to get inspiration and learn how he can best make a difference.

### **Intends to visit all 98 municipalities**

For the vast majority of citizens, the municipality is the first and most frequent entry to the public administration. The municipalities' decision-making activities and case processing are therefore essential for citizens' legal rights. This was one of the reasons that Christian Britten Lundblad at his accession announced that he was going to initiate a tour of Denmark's municipalities. In 2025, he visited 10 municipalities. He expects to visit another 20 in 2026, and the objective is to visit all 98 municipalities within the coming years.

The purpose of the visits is to meet the municipal officials that represent the administrative branches closest to the citizens, thereby learning more about the types of cases and problems that the Ombudsman should be more aware of – not least in relation to vulnerable citizens.

In his dialogue with the municipalities, Christian Britten Lundblad is also interested in suggestions as to how the Ombudsman Office can contribute to the prevention of errors in the municipalities' case processing, for instance through

A dark blue silhouette of Denmark is centered on a lighter blue background with a subtle diamond-patterned grid. Ten white checkmarks are placed on the map, each with a corresponding label for a municipality. The municipalities are: Frederikshavn (north), Læsø (east coast), Fredericia (west coast), Middelfart (west coast), Assens (southwest), Odense (south), Albertslund (east coast), Glostrup (east coast), Gentofte (east coast), and Frederiksberg (east coast).

Frederikshavn

Læsø

Fredericia  
Middelfart

Assens

Odense

Albertslund  
Glostrup

Gentofte  
Frederiksberg

In 2025, the  
Ombudsman  
visited ten  
municipalities.

the Ombudsman's Guide for Authorities, which contains guidance to the municipal administration, among others. In connection with the visits up till now, several good suggestions have already been made. The various inputs from the municipalities that are brought back to Gammeltorv are to help target the Ombudsman Office's efforts to the areas with the biggest need, thus strengthening citizens' legal rights.

In addition, the dialogue with the municipalities can provide the Ombudsman with information that can make it possible to identify systemic errors and patterns in the challenges that arise in the authorities' practice and that are not necessarily caught via the written complaint case processing.

### Contact committee with municipal citizen advisors

When meeting the municipalities, Christian Britten Lundblad encourages the municipal citizen advisors to participate in the dialogue since they are in close contact with the citizens via their local anchoring and therefore can contribute with knowledge that is relevant to the Ombudsman's activities.

In addition, the Ombudsman has found occasion to establish a contact committee with municipal citizen advisors. At the contact committee's meetings, the municipal citizen advisors and the Ombudsman Office can exchange experiences

and discuss problems of common interest. The dialogue will also give the Ombudsman an opportunity to see patterns in the problems that the municipal citizen advisors work with nationwide.

### Input from NGOs

Besides the tour of the municipalities, Christian Britten Lundblad prioritises an ongoing dialogue with civil society's organisations. Not least the ones close to some of society's most vulnerable citizens (for example legal aid organisations), which can therefore qualify as well as forward complaints to the Ombudsman.

The organisations are up to speed in relation to the challenges that may arise in the encounter between vulnerable citizens and the public administration. Among other things, they can therefore contribute to elucidating more systemic problems in relation to the authorities' processing of cases, for example social services cases.

In 2025, the Ombudsman had meetings with, for instance, the Muscular Dystrophy Foundation, was on the streets with Stenbroens Jurister – Street lawyers in Copenhagen and with Gadejuristen (The Street Lawyers), visited Mændenes Hjem (support organisation), Reden (support organisation for women) and Joannahuset (crisis centre for children and young people under the age of 18), and he was in contact with SAND (organisation for homeless people) and with the Disabled People's Organisations Denmark.

### Meeting with Stenbroens Jurister – Street lawyers in Copenhagen

After the meeting with the Ombudsman, Stenbroens Jurister – Street lawyers in Copenhagen have submitted two complaints about cash benefits for homeless people, among other things. In both instances, the Ombudsman has given the authorities the opportunity to elaborate on the legal basis of their decision or case processing. One of the cases concerns whether the municipality had the necessary basis for cessation of cash benefits for the homeless person on the grounds that he was not staying in the municipality.

### Future approach

In the coming years, Christian Britten Lundblad will continue his tour of Denmark's municipalities and the dialogue with organisations that work to benefit society's vulnerable citizens. The purpose is not to give criticism but to gain insight into common practice, share experiences and get input which can be used to ensure that the Ombudsman's efforts stay relevant and targeted towards citizens' legal rights.

### Meeting with the Muscular Dystrophy Foundation

At the meeting with the Muscular Dystrophy Foundation, the Foundation explained some general views on the National Social Appeals Board's case processing, including the Board's use of statistical information in cases about covering extra costs for disability cars. The Ombudsman subsequently reviewed three specific complaints about this from the Muscular Dystrophy Foundation, which he found that the National Social Appeals Board should have the opportunity to reconsider.





# When the municipality is disqualified

If a municipality has a conflict of interest in the outcome of an issue it is processing, there may be a case of so-called administrative disqualification. But when is a municipality disqualified? And if it is, what should the municipality do?

Klaus Tranbjerg Toftgaard,  
Special Legal Advisor  
Pernille Bjørnholk,  
Deputy Head of Division



The Public Administration Act contains rules on personal disqualification, but an authority as such can also be disqualified. This is because there is an unwritten principle of law regarding so-called administrative disqualification.

In both instances, the aim is to limit the risk that the decision in a case is influenced by unreasonable or non-relevant considerations and to prevent the development of mistrust in the authorities.

If an authority is disqualified, it can normally not process a case. Instead, the case must be transferred to another authority by so-called substitution. However, there can be instances where substitution is not possible and where the authority must process the case after all, even though it is disqualified. This can be the case in relation to municipalities, where there is generally no possibility of transferring a case from one municipal council to another (with a different voter base etc.).

Also when substitution is not possible, it is crucial to check whether there is an issue of administrative disqualification in the case, because if so, the authority must take this into account in its case processing.

### When is a municipality disqualified?

If a municipality has a conflict of interest in the outcome of an issue it is processing, it may constitute administrative disqualification.

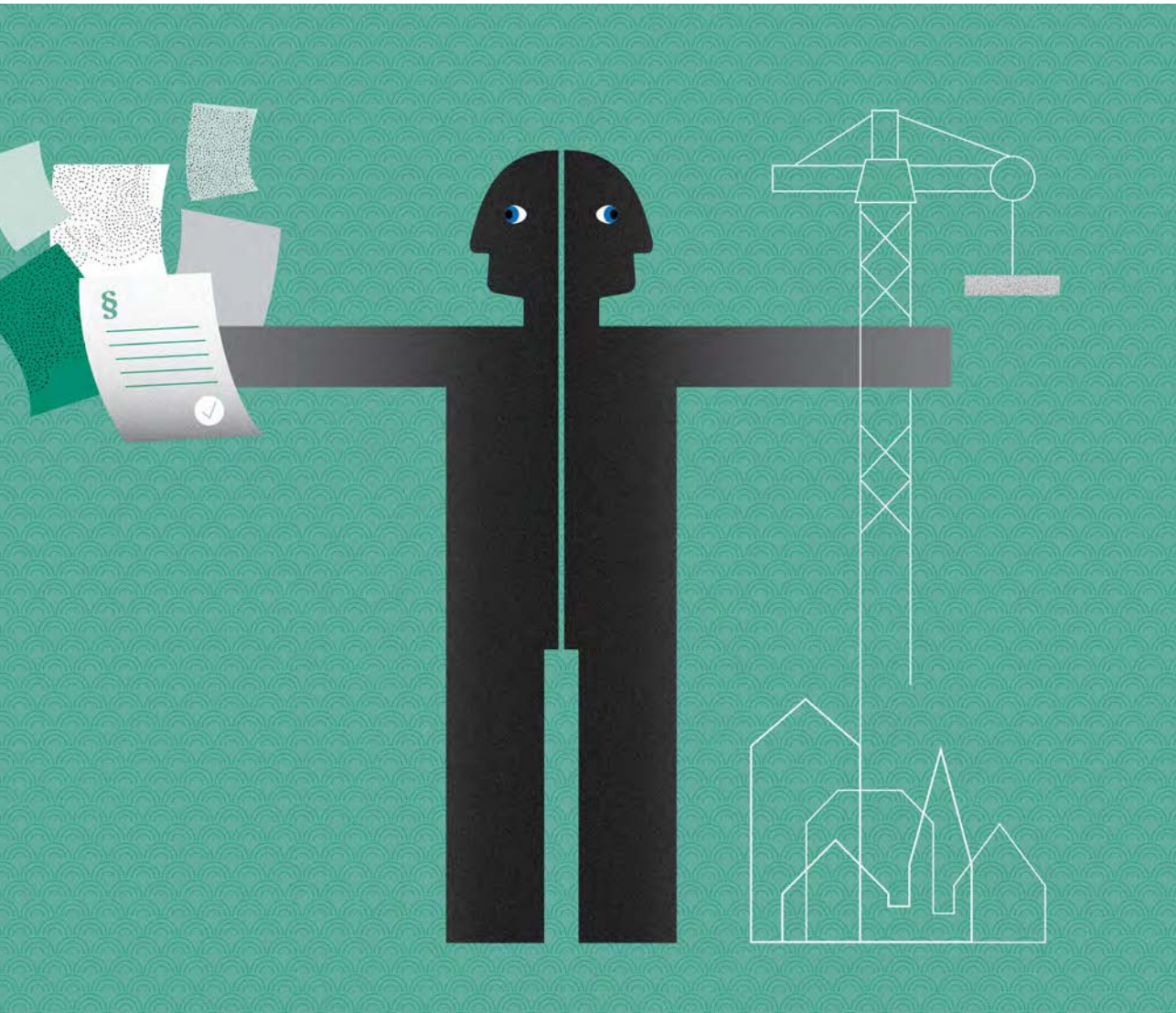
Administrative disqualification may be present particularly when a municipality is a party in a case. This situation occurs regularly as a result of the municipalities' various tasks, for instance when a new school is to be built or a day care institution is to be restructured. In such instances, the municipality can be the developer on the one hand, and thereby responsible for applying for the required permissions etc., and it can on the other hand be the authority that makes decisions on granting those permissions in the case. Examples of this sort of situation include the case FOB 1997.150 on layout of an after-school care facility and the case FOB 2007.459 on establishment of a day care institution.

A municipality may also be a party in cases regarding dispensation from the rules in for instance the fields of environment and planning. Examples include the case FOB 2023-31, where a municipality needed dispensation from the legislative requirement of distance to the urban zone in order to be able to use an area for cattle

grazing, and the case MAD 2004.95 V on dispensation pursuant to the Protection of Nature Act for building within the woodland building line.

In all the mentioned cases, the authority was considered to be disqualified.

The assessment of whether or not there is administrative disqualification is objective and general. Therefore, the decisive point is whether there is an (non-relevant) interest in the case that must be considered grounds for disqualification – and not whether there is a concrete risk



that the municipality will make a wrong decision. It is also unimportant whether the outcome of the decision follows directly from the rules or whether the rules allow the municipality to exercise discretion in its decision.

This means that there is nothing intrinsically wrong or reproachable in a municipality being disqualified. However, it is important that the municipality is then aware that it is disqualified and considers what to do in that connection.

### What must a municipality do in case of disqualification?

If a municipality ascertains that it is administratively disqualified, it has a duty to react, including to consider the possibility of substitution. As mentioned above, a municipality does not in general have a possibility of transferring the matter to another municipality. But if that is so, the municipality must take the conflict of interest into account in another way, and there are various measures that the municipality can take in that connection.

The municipality can consider whether the case can be dealt with in another part of the municipality (for instance in another administrative branch) or whether consideration for ensuring the relevant professional skills speaks against it. It would also be relevant to consider whether external assistance should be brought in, for instance in the form of a professional opinion from a specialist authority in the field or by including relevant specialist knowledge from private organisations.

Next, it can enter into the municipality's considerations whether the matter should be assessed less strictly for the citizen (and more strictly for the municipality) than according to usual practice. However, this presupposes that the less strict assessment does not have a negative

#### The case FOB 2023-31: Municipality was administratively disqualified when it granted itself dispensation

A municipality made a decision to grant dispensation for putting up fences and establishing cattle grazing on an area that belonged to the municipality. The application for dispensation was submitted by the municipality's Team Nature while the dispensation case was processed by the municipality's Team Agriculture. Both teams belonged under the same department.

The Ombudsman assessed that, as applicant, the municipality was a party in the dispensation case and thereby administratively disqualified. As the case could not be transferred to another authority, the municipality was allowed to make a decision in the case despite the administrative disqualification.

Based on the information in the case, the Ombudsman had to assume that the municipality had not been aware of being disqualified before it made the decision on dispensation and, consequently, had not considered any special measures in connection with the processing of the case. The Ombudsman therefore recommended the municipality to reopen the processing of the case.

impact on any other parties or on the public interest.

In addition, the municipality must take into consideration the conflict of interest when drawing up the decision. Consequently, the decision should state that there has been administrative disqualification, but that substitution has not been possible. Furthermore, the municipality should give particularly detailed grounds for the decision if it is to the municipality's advantage or if it adversely affects a party in the case.

In addition, if the decision is subsequently appealed to an appeals body, the appeals body can carry out a more intensive review of the decision.

In the above-mentioned case FOB 2023-31, the Ombudsman stated that the municipality should have considered whether special measures should have been taken. The municipality then made a new decision on dispensation. It appeared from this decision what considerations the municipality had had regarding the administrative disqualification and the consequences thereof. It also appeared that the municipality had made special provisions in connection with the new decision, among other things by making a certain division of the handling of the case.

### What if the municipality does not realise that it is disqualified?

If a municipality does not realise and take into account that it is disqualified, a worst-case scenario is that the municipality makes a wrong decision that is underpinned by non-objective considerations or where relevant counter-indicative considerations are not sufficiently included. And though the decision may be correct, the handling can weaken the trust in the municipality.

Ultimately, a lack of compliance with the rules on administrative disqualification may result in the municipality's decision in the case being invalid.

### A few points

A municipality as such can be disqualified. This follows from a general principle of law on administrative disqualification.

The assessment of whether or not there is administrative disqualification is objective and general. The decisive point is whether the municipality has a special and non-relevant interest in the case – not whether this in fact influences the decision.

If a municipality ascertains that it is administratively disqualified and cannot be substituted, it has a duty to act on this and consider taking special measures to alleviate the conflict of interest, for instance by obtaining external specialist assistance.

The municipality's decision should also state that there has been an issue of administrative disqualification, and the municipality should normally provide particularly detailed grounds for the decision. In addition, any appeals body can carry out a more intensive review of the decision.

If an authority has not realised and taken into account that it is disqualified, it can ultimately mean that the decision is invalid.

› The FOB cases mentioned in the article are published (in Danish) at [www.ombudsmanden.dk](http://www.ombudsmanden.dk)



# **‘A unique view at us from the outside’**

**It gives a new perspective on the daily tasks when the Ombudsman’s visiting team comes by, says Head of Unit Hanne Vilstrup from Søbysøgård Prison’s unit for young offenders**

Martin Østergaard-Nielsen,  
Special Communications Advisor



Oftentimes, many things are set in motion when the Ombudsman announces to an institution that his visiting team will be coming by. There are documents to write, statistics to prepare, information to provide. Frequently in cooperation between several staff members and departments. In order to prepare the monitoring visit in the best possible way, the Ombudsman often asks for a number of details and data about the institution's work before the visit itself is carried out.

However, Hanne Vilstrup does not mind. She is Head of Unit at Søbysøgård Prison, the only prison in Denmark with a closed unit for young people under 18. She says that, for her, there is a professional satisfaction in preparing the requested material.

'It is an important event for us when the Ombudsman comes to visit. And it is something that we take very seriously. We are proud of the work we do every day, and we would like to present it. Even though it takes time and effort to provide the information you request in the form of notices, documentation, statistics etc.'

### Spark reflections

In her role as Head of Unit, Hanne Vilstrup has experienced two monitoring visits from the Ombudsman's Children's Division in 2025, one to

Søbysøgård Prison, one to Assens Arrest (local prison), which are both part of Central Funen's state and local prisons.

And in her experience, the monitoring visits spark reflections among the prison's staff and management about how they handle some of the tasks that they quite routinely deal with every single day. Such as the involvement of the young people's custodial parents.

'This exact question was the subject of a longer dialogue with the Ombudsman's visiting team at the latest monitoring visit', says Hanne Vilstrup, 'because how do you do that? That is a quite special task that we need to solve – also with due consideration for the young people. And I thought that it was beneficial to speak with you because you had been in contact with the custodial parents of some of the young people that are here at Søbysøgård before you visited us.'

In that way, you could convey their view of us. It was important knowledge that we might not have learned if we had called the parents ourselves. And it was immensely interesting to hear their feedback to you. Fortunately, it was for the most part positive. But they also gave us a new perspective on the routines and structures that we use in our work.'

**Hanne Vilstrup, Head of Unit at Søbysøgård Prison's closed unit for young offenders. Previous places of work: Møgelkær Prison and Enner Mark Prison. Has been employed with the Danish Prison Service (formerly the Prison and Probation Service) for 14 years.**

**Søbysøgård Prison is close to Nørre Søby on Funen. The Prison has a closed unit for young offenders with room for seven inmates aged between 15 and 17. The Prison also has an open unit for young offenders.**

**The Ombudsman carried out his monitoring visit in cooperation with the Danish Institute for Human Rights and DIGNITY – Danish Institute Against Torture.**

## Few visits

Hanne Vilstrup mentions the frequency of visits to the young inmates as another topic on which the prison got a renewed focus in connection with the Ombudsman's monitoring visit.

'You asked us to provide information about the prison's operations and activities in the last three years. And in that time perspective, one thing became clear, which we were in fact already conscious of, which is that the young people had received relatively few visits. It was not necessarily something we thought much about day to day. But now it made us ask ourselves: 'Is there something we can improve on here?' Not because we had refused many visits, because we hadn't. But it was still a clear issue. For that matter, it was also something you pointed out in connection with your observations during the visit.'

## Important with spoken dialogue

Hanne Vilstrup adds that she fundamentally considers it a strength of the Ombudsman's monitoring activities that the visit itself is largely structured around a spoken dialogue between the visiting team and representatives of the visited institution – starting off from the prepared material.

'I think that the dialogue-based way is educational in a different way than if it was all a written report', she says. 'We get to have some discussions around the table where we talk about in what way we can learn and what we can do better. And I must say that the visiting team from the Ombudsman's Children's Division have also shown receptiveness and have given us the opportunity to explain some things in depth. Not everything can be put down in the documents. So it goes both ways. We get some knowledge, but we also give some back.'

## In the engine room

In conclusion, Hanne Vilstrup mentions that she appreciates the Ombudsman's monitoring visits because they provide professional feedback to herself and the other staff at an institution like Søbysøgård, which is the only one of its kind in Denmark.

'We are the only prison that has an actual closed unit for young people under 18. This means that we deal with some issues that are unique in our field. It is therefore nice that someone like you comes by and spends so much time on the young people and their conditions. It gives some input to our work which we otherwise wouldn't get. You dive all the way down into the engine room, where no one normally goes besides us. And that gives us a unique view of ourselves from the outside.'

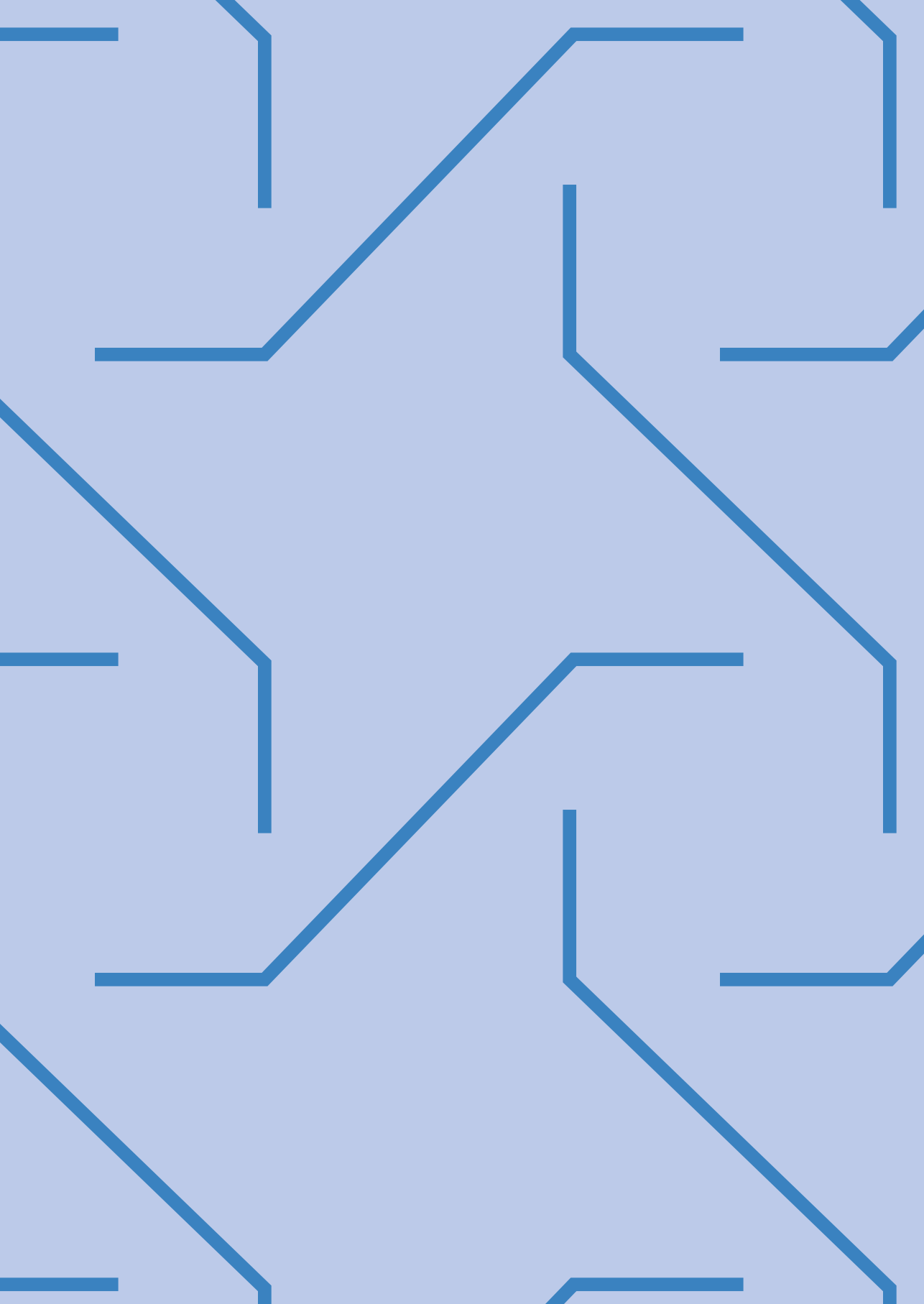






The background features several abstract, light blue geometric shapes composed of straight lines. These shapes are scattered across the page, some resembling stylized outlines of buildings or architectural elements. The lines are of a consistent thickness and color, creating a modern, minimalist aesthetic.

# **Brief overview of the year**



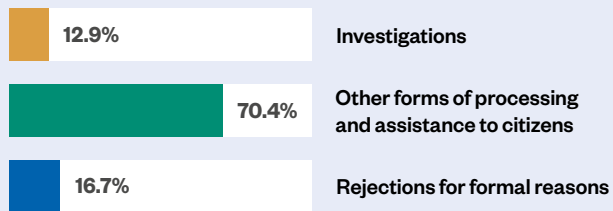
# The year in figures

The following pages contain key figures for the cases processed by the Ombudsman in 2025. More information about the Ombudsman's work and the rules governing the Ombudsman's activities can be found on [www.en.ombudsmanden.dk](http://www.en.ombudsmanden.dk).

## Concluded cases<sup>1</sup>

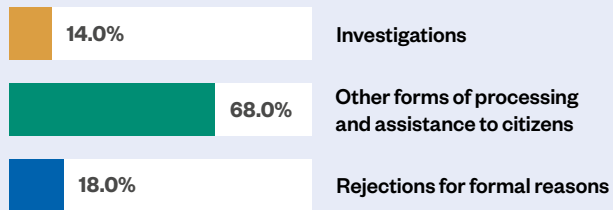
# 2025

7,125 cases



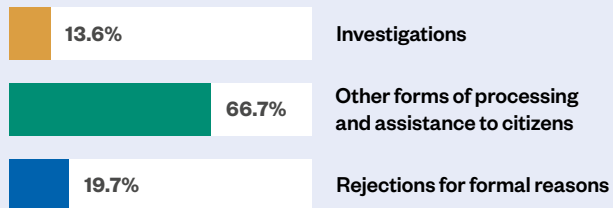
# 2024

6,439 cases



# 2023

6,064 cases



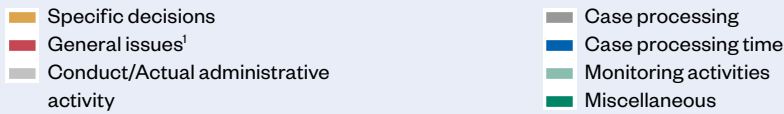
1) Administrative cases are not included. In addition, cases selected for collective review in connection with general own-initiative investigations are not normally included.

## What was the outcome of the cases?

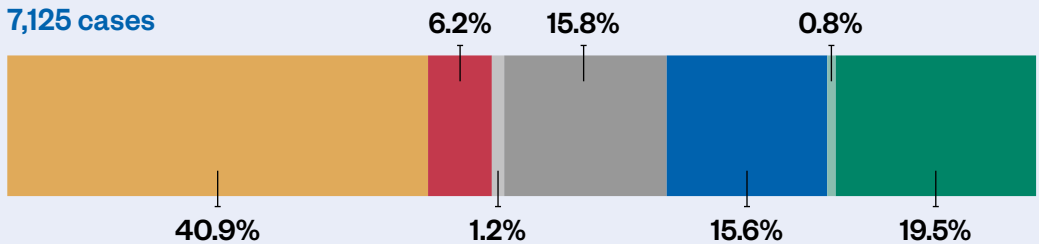
	Concluded cases
<b>1. Investigations</b>	
Full investigations	199
– of which cases with criticism, formal or informal recommendations etc.	98
Shortened investigations <sup>1</sup>	720
<b>Investigations, total</b>	<b>919</b>
<b>2. Other forms of processing and assistance to citizens</b>	
Various forms of intervention in cases where the avenues of processing by authorities had not been exhausted	2,513
– of which cases forwarded to authorities	920
Cases where the Ombudsman's review did not lead to further investigation	1,771
Answers to enquiries, guidance etc.	735
<b>Other forms of processing and assistance to citizens, total</b>	<b>5,019</b>
<b>3. Rejections for formal reasons</b>	
Complaints which were submitted too late to the Ombudsman	153
Cases where the complaint/appeal options to authorities had not been used – and could no longer be used	66
Cases which related to courts, judges or matters on which a court had made or could be expected to make a decision – and were thus outside the Ombudsman's jurisdiction	258
Cases which concerned matters relating to Parliament, including legislative issues, and were thus outside the Ombudsman's jurisdiction	91
Complaints which related to other matters outside the Ombudsman's jurisdiction, including private legal matters	253
Complaints which were not clarified sufficiently to be able to be processed and complaints which were withdrawn	240
Cases in which the Ombudsman declared himself disqualified	3
Anonymous approaches	123
<b>Rejections for formal reasons, total</b>	<b>1,187</b>
<b>Total (1-3)</b>	<b>7,125</b>

1) Shortened investigations comprise primarily cases in which the Ombudsman reviewed a complaint but decided not to obtain statements from the authorities because it was unlikely that a full investigation would result in criticism or recommendations. The category of shortened investigations also includes, among others, cases which were reopened by the authorities after the Ombudsman asked them for a statement (21 cases in 2025).

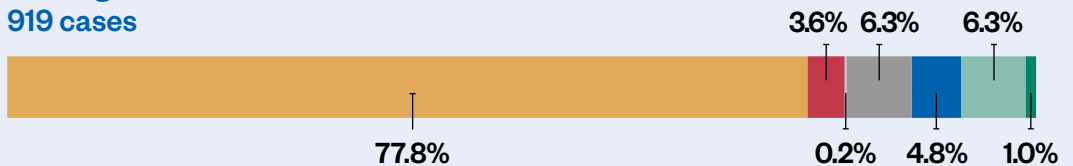
## What did the cases concern?



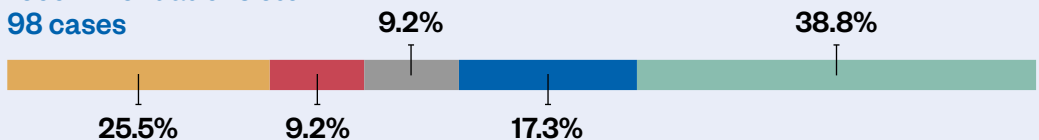
### All concluded cases 7,125 cases



### Investigations 919 cases



### Cases with criticism, formal or informal recommendations etc. 98 cases



1) The category 'General issues' comprises, for instance, the overall conditions in an institution or questions such as whether an act provides authority for an executive order or whether an authority's general practice within a specific area is acceptable.

## Which authorities etc. were involved?

### Cases concluded in 2025 – by authority etc.

	Investigations		Other forms of processing and assistance to citizens	Rejections for formal reasons	Total cases
	With criticism, formal or informal recommendations etc.	Without criticism, formal or informal recommendations etc.			
<b>A. Ministries and authorities etc. under them<sup>1</sup></b>					
Ministry of Employment	0	10	64	10	84
Ministry of Urban, Rural and Ecclesiastical Affairs	1	2	27	1	31
Ministry of Children and Education	1	7	43	2	53
Ministry of Digital Affairs	0	5	13	2	20
Ministry of Industry, Business and Financial Affairs	4	53	105	21	183
Ministry of Finance	1	1	5	1	8
Ministry of Defence	1	16	47	2	66
Ministry of the Interior and Health	4	52	132	15	203
Ministry of Justice	28	188	636	87	939
Ministry of Climate, Energy and Utilities	0	8	15	3	26
Ministry of Culture	3	4	55	6	68
Ministry of Environment and Gender Equality	1	3	16	2	22
Ministry of Food, Agriculture and Fisheries	0	4	17	3	24
Ministry of Green Transition	0	6	19	2	27
Ministry of Resilience and Preparedness	0	1	7	0	8
Ministry of Taxation	14	79	344	43	480
Ministry of Social Affairs and Housing	7	208	588	131	934
Prime Minister's Office	0	6	11	1	18
Ministry of Transport	0	13	93	10	116
Ministry of Higher Education and Science	1	16	101	8	126
Ministry of Foreign Affairs	1	3	26	5	35
Ministry of Immigration and Integration	3	37	135	39	214
Ministry of Senior Citizens	0	0	2	0	2
<b>Total</b>	<b>70</b>	<b>722</b>	<b>2,501</b>	<b>394</b>	<b>3,687</b>

1) The cases have been classified under the ministries existing at the end of the year. Concluded cases relating to authorities which have been moved to another ministry, closed down or reorganised have as a general rule been classified under the ministries which had the remit for the relevant areas at the end of the year.

**Cases concluded in 2025 – by authority etc.**

	Investigations		Other forms of processing and assistance to citizens	Rejections for formal reasons	Total cases
	With criticism, formal or informal recommendations etc.	Without criticism, formal or informal recommendations etc.			
<b>B. Municipal and regional authorities etc.</b>					
Municipalities	11	81	1,483	193	1,768
Regions	13	6	97	12	128
Joint municipal or regional enterprises	0	0	12	2	14
Special municipal or regional entities	0	0	2	0	2
<b>Total</b>	<b>24</b>	<b>87</b>	<b>1,594</b>	<b>207</b>	<b>1,912</b>
<b>C. Other authorities etc. within the Ombudsman's jurisdiction<sup>2</sup></b>					
Other authorities etc. within the Ombudsman's jurisdiction	4	12	127	18	161
<b>Total</b>	<b>4</b>	<b>12</b>	<b>127</b>	<b>18</b>	<b>161</b>
<b>D. Authorities etc. within the Ombudsman's jurisdiction, total</b>					
Ministries and authorities etc. under them, total (A)	70	722	2,501	394	3,687
Municipal and regional authorities etc., total (B)	24	87	1,594	207	1,912
Other authorities etc. within the Ombudsman's jurisdiction, total (C)	4	12	127	18	161
<b>Total</b>	<b>98</b>	<b>821</b>	<b>4,222</b>	<b>619</b>	<b>5,760</b>
<b>E. Institutions etc. outside the Ombudsman's jurisdiction</b>					
Courts etc., cf. Section 7(2) of the Ombudsman Act	0	0	0	143	143
Dispute tribunals, cf. Section 7(3) of the Ombudsman Act	0	0	0	28	28
Other institutions, associations, enterprises and persons outside the Ombudsman's jurisdiction	0	0	0	293	293
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>464</b>	<b>464</b>
<b>F. Cases not relating to specific institutions etc.</b>					
	0	0	797	104	901
<b>Grand total (A-F total)</b>	<b>98</b>	<b>821</b>	<b>5,019</b>	<b>1,187</b>	<b>7,125</b>

2) The figures comprise cases involving private institutions which fall within the Ombudsman's jurisdiction in connection with OPCAT or in the children's sector and other institutions etc. which have been included under the Ombudsman's jurisdiction. In 2025, the Ombudsman decided in pursuance of section 7(4) of the Ombudsman Act that his jurisdiction was to extend to Hillerød Service A/S and Hillerød Forsyning Holding A/S to the extent to which the companies are subject to the provisions of the Access to Public Administration Files Act

# Processing times



Complaint cases and



own-initiative investigations<sup>1</sup>

Investigations

– of which cases about access to public records<sup>2</sup>

**360 days**  
Result: 98%  
(Target: 90%)

**180 days**  
Result: 92%  
(Target: 70%)



**40 working days**  
Result: 93%  
(Target: 90%)

**20 working days**  
Result: 77%  
(Target: 45%)



Average processing time

**87**  
days

**14**  
working days

- 1) Processing times for investigations and for cases which are concluded with other forms of processing and assistance to citizens or are rejected for formal reasons are calculated in calendar days from the date on which the case begins (in complaint cases the date of the Ombudsman's receipt of the complaint) until the Ombudsman concludes the case.
- 2) Complaint cases about access to public records under the Access to Public Administration Files Act, the Environmental Information Act, the Administration of Justice Act etc., except for cases about the right of a party to a case to obtain access to documents of the case. Processing times are stated in working days – as in the Access to Public Administration Files Act. The number of working days is calculated from the date on which the Ombudsman has received replies from the citizen and the authorities and the case is ready for final processing (the 'maturity date').



## Monitoring cases<sup>3</sup>

### Other forms of processing and assistance to citizens and rejections for formal reasons

**180 days**  
Result: 100%  
(Target: 98%)



**90 days**  
Result: 96%  
(Target: 90%)

**180 days**  
Result: 85%  
(Target: 80%)



3) Concluded cases concerning monitoring visits to institutions etc. for children and for adults, monitoring visits to investigate physical accessibility for persons with disabilities and monitoring of forced deportations of foreign nationals. The processing time for a monitoring case is calculated from the date of the monitoring visit or the deportation.

## Other facts

The Ombudsman declared himself disqualified in three cases in 2025. Parliament's Legal Affairs Committee assigned the processing of these cases to Olaf Tingleff, High Court Judge, as ad hoc ombudsman.

The Inatsisartut (the Parliament of Greenland) asked the Ombudsman to act as ad hoc ombudsman for the Ombudsman for Inatsisartut in one case in 2025.







# **Extracts from news items from the Ombudsman**

**of relevance for international  
readers**

**The following are extracts from news items from 2025 which were published on the Ombudsman's English website because they were considered to be of relevance for international readers. The news items can be read in full on [www.en.ombudsmanden.dk](http://www.en.ombudsmanden.dk).**

**23 January**

**The Ombudsman's Children's Division monitors young people's conditions in state and local prisons in 2025**

Every year, a number of young people aged 15-17 are imprisoned in state or local prisons.

During its 2025 monitoring visits, the Ombudsman's Children's Division will focus on the conditions and environment for the young people who are placed in Prison and Probation Service institutions in which there are primarily adults.

**28 January**

**The Ombudsman looks into conditions for patients in forensic psychiatric departments**

In 2025, the Ombudsman will visit the departments of forensic psychiatry where, among others, persons who have been sentenced to psychiatric detention or treatment are hospitalised.

'With our monitoring visits, we help to ensure that patients who are hospitalised in the psychiatric departments are treated with respect and consideration and in accordance with their rights', says the temporary Parliamentary Ombudsman, Henrik Bloch Andersen.

**29 January**

**The Ombudsman has looked into disabled access to a number of healthcare centres**

As part of his monitoring of the accessibility to public buildings for persons with disabilities, the Parliamentary Ombudsman has over a period of time focused on healthcare centres. He has carried out monitoring visits to six healthcare centres around the country.

**3 February**

**The Ombudsman looks into disabled access to citizen service centres**

Over the coming years, the Parliamentary Ombudsman will be monitoring accessibility for persons with disabilities to municipal citizen service centres.

This is part of the Ombudsman's task of investigating whether public buildings are accessible for persons with disabilities.

**27 February**

**The Ombudsman investigates visiting conditions at Western Prison**

The Parliamentary Ombudsman has decided to start an investigation of the possibilities for Western Prison inmates to have visitors.

...

The Ombudsman carries out his investigation following his unannounced monitoring visit to Western Prison in September 2024. One of the purposes of the monitoring visit was exactly to look into the inmates' possibilities of receiving visits from their relatives.

**13 March**

**Christian Britten Lundblad elected new Ombudsman**

Parliament has today elected Christian Britten Lundblad as new Ombudsman. He is succeeding Niels Fenger, who in October 2024 took up a position as judge at the Court of Justice of the European Union.

**3 June**

**The Prison and Probation Service should obtain greater knowledge of inmates' access to visits at Western Prison**

At present, the Department of Prisons and Probation does not know if the inmates at Western Prison get the visits they are entitled to according to the rules. This is because the Prison and Probation Service does not have the sufficient data basis to make this assessment.

The Department states this in a reply to the Parliamentary Ombudsman, who started an investigation of the visiting conditions at Western Prison after an unannounced monitoring visit to the prison. (...)

...

'Being able to have visits from your closest family members, for example, is of great significance to inmates as well as relatives. Therefore, it is also important that the Department obtains the necessary knowledge in order to shed light on the extent of the problem, thereby contributing to ensuring that the rules about inmates' right to get visits are observed', says Parliamentary Ombudsman Christian Britten Lundblad.

**13 June**

**2024 Annual Report available in English – including article on the Children's Division's talks with children during monitoring visits**

Every year, the Ombudsman's Children's Division carries out monitoring visits to some of the institutions and facilities where vulnerable children and young people reside and stay. This could be departments of child and adolescent psychiatry, secure residential institutions or private accommodation facilities for children and young people.

...

In the Parliamentary Ombudsman's Annual Report, which has just been published in English, one of the articles is about how the Children's Division conducts interviews with vulnerable children and young people in connection with monitoring visits. Including particularly how to build an informal and safe setting for a talk with a child or young person you have not met before.

**1 July**

**Convicted sexual offenders must wait too long for treatment**

Generally, a person convicted of certain sexual offences initially has to serve their sentence at Herstedvester Prison's assessment and observation unit. Here it is to be determined if the convicted person has a need for – and is motivated for – sexological treatment, for example.

However, the waiting time for transfer to the unit is long, and many of the convicted persons have served a relatively large part of their sentence before they come to the assessment unit. (...)

'A long waiting time for transfer of convicted sexual offenders to the assessment programme can mean that there are convicted sexual offenders that do not receive the relevant sexual or psychiatric treatment while they serve their sentences. Out of consideration for society as well as the individual inmate, there is reason to keep a great focus on reducing the waiting time', says Parliamentary Ombudsman Christian Britten Lundblad.

**18 August**

**The Ombudsman conducts monitoring of detention facilities and institutions in Greenland**

In the end of August and beginning of September, a monitoring team from the Danish Parliamentary Ombudsman is going to visit a number of institutions, police stations and municipal bailiffs in Greenland. The monitoring team will in the institutions investigate the conditions for those deprived of their liberty.

**21 August**

**The Ombudsman to recommend free legal aid in case on access to indictments against former head of Defence Intelligence Service and former Minister for Defence**

The Ombudsman is prepared to recommend free legal aid to have the courts review whether a journalist can get full access to the indictments against a former head of the Defence Intelligence Service and a former Minister for Defence.

**22 September**

### **Local prisons should increase focus on the nature of the cell work they offer inmates**

In his new thematic report, the Ombudsman focuses on inmates' access to visits and occupation in the Prison and Probation Service. Among other things, the Ombudsman has found that the inmates in certain local prisons are primarily offered work folding Christmas decorations that are often thrown out afterwards. This causes dissatisfaction with the inmates, who would like to produce items with actual utility value.

**25 September**

### **Partly closed residential institutions should ensure better knowledge of the special rules and legal safeguards that apply when using force**

Denmark's seven partly closed residential institutions for children and young people should do more to ensure that the institutions have sufficient knowledge of the special rules and legal safeguards that apply when force is used in these institutions.

This appears from the Ombudsman's new thematic report on institutions for children after carrying out monitoring visits to Denmark's seven partly closed residential institutions and partly closed wards in residential institutions.

**6 October**

### **The Ombudsman looks at the Property Assessment Agency's possibilities for explaining calculations behind property assessments**

In a recently started investigation, the Parliamentary Ombudsman asks the Property Assessment Agency if the Agency is able to explain to the property owners the underlying calculations etc. of their property assessments.

The Ombudsman's investigation stems from a specific case about a citizen who, according to himself, could not be informed how the assessment of his property had been calculated. (...)

**17 November**

### **The Psychiatric Patients' Complaints Board has criticisable processing times in cases about force**

When a decision is made about forced admission or forced detention of a patient in the psychiatric sector, the patient has (...) a special right to a simple, effective and speedy judicial review of the deprivation of liberty.

This access to judicial review applies when the patient has had his or her complaint processed in the Psychiatric Patients' Complaints Board. (...)

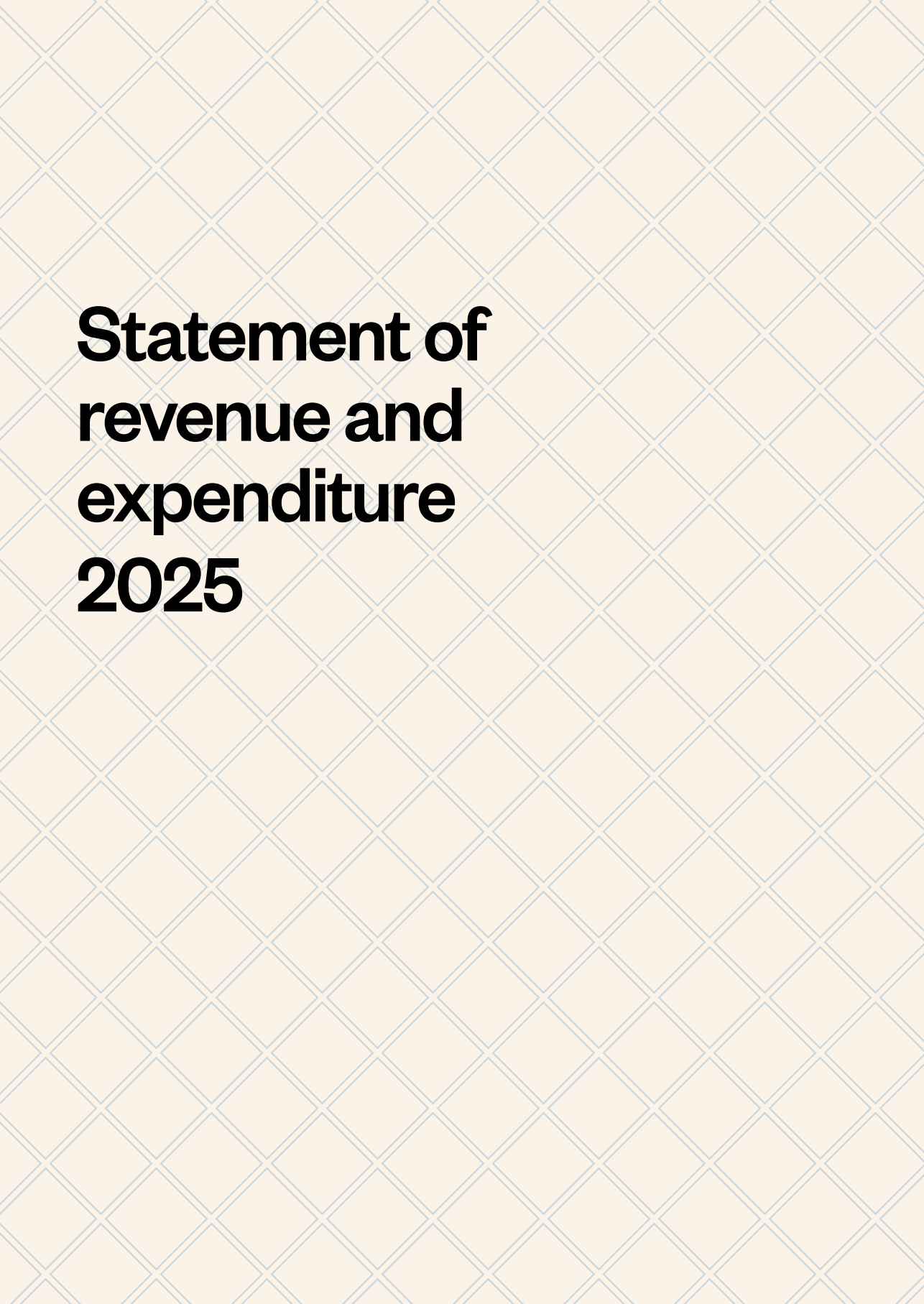
However, an investigation from the Parliamentary Ombudsman shows that the complaint cases concluded in the first quarter of 2025 had an average case processing time of 212.8 days (approx. seven months). (...)

**16 December**

### **Tax authorities should still focus on being available on the telephone**

In the time around the release of the tax assessment notices in the spring of 2025, the Danish Tax Agency answered a little over 430,000 calls, while about 1.7 million calls were cancelled without getting through or in a queue. And in the busiest week – week 13, when the tax assessment notices were released – the Tax Agency answered about 48,000 calls, while about 412,000 calls were cancelled.

This information appears in connection with a new investigation from the Parliamentary Ombudsman of the Tax Agency's telephone service during the period around the release of the tax assessment notices in 2025. The investigation also includes the Danish Property Assessment Agency's and the Danish Debt Collection Agency's telephone service between 1 March and 1 July 2025. (...)



# **Statement of revenue and expenditure 2025**

## The Ombudsman's ordinary activities

	DKK
<b>Revenue</b>	
Revenue	66,000
<b>Total revenue</b>	<b>66,000</b>
<b>Expenditure</b>	
Wages and salaries, pension costs	92,066,000
Rent	7,872,000
Staff and organisation, including staff welfare	995,000
Continuing training/education	777,000
Books and library	140,000
Specialist databases	1,843,000
Newspapers and journals	241,000
Communication	804,000
Computer systems – operations and development	3,469,000
Computer hardware	472,000
Telephony and internet	390,000
Premises – repairs and maintenance	621,000
Furniture, fixtures and fittings	340,000
Cleaning, laundry and refuse collection	474,000
Heating and electricity	697,000
Premises – other expenditure	283,000
Travel	747,000
Entertainment and meals	82,000
Contribution to financial support scheme for trainees; etc.	588,000
Stationery and office supplies	88,000
Other goods and services	1,488,000
<b>Total expenditure</b>	<b>114,478,000</b>
<b>Total expenditure (net)</b>	<b>114,411,000</b>
Appropriation	115,700,000
<b>Result for the year</b>	<b>1,289,000</b>

## Public service pensions

	DKK
Revenue	2,177,000
Expenditure	3,246,000
<b>Result for the year</b>	<b>-1,069,000</b>

## Collaboration agreement with Ministry of Foreign Affairs

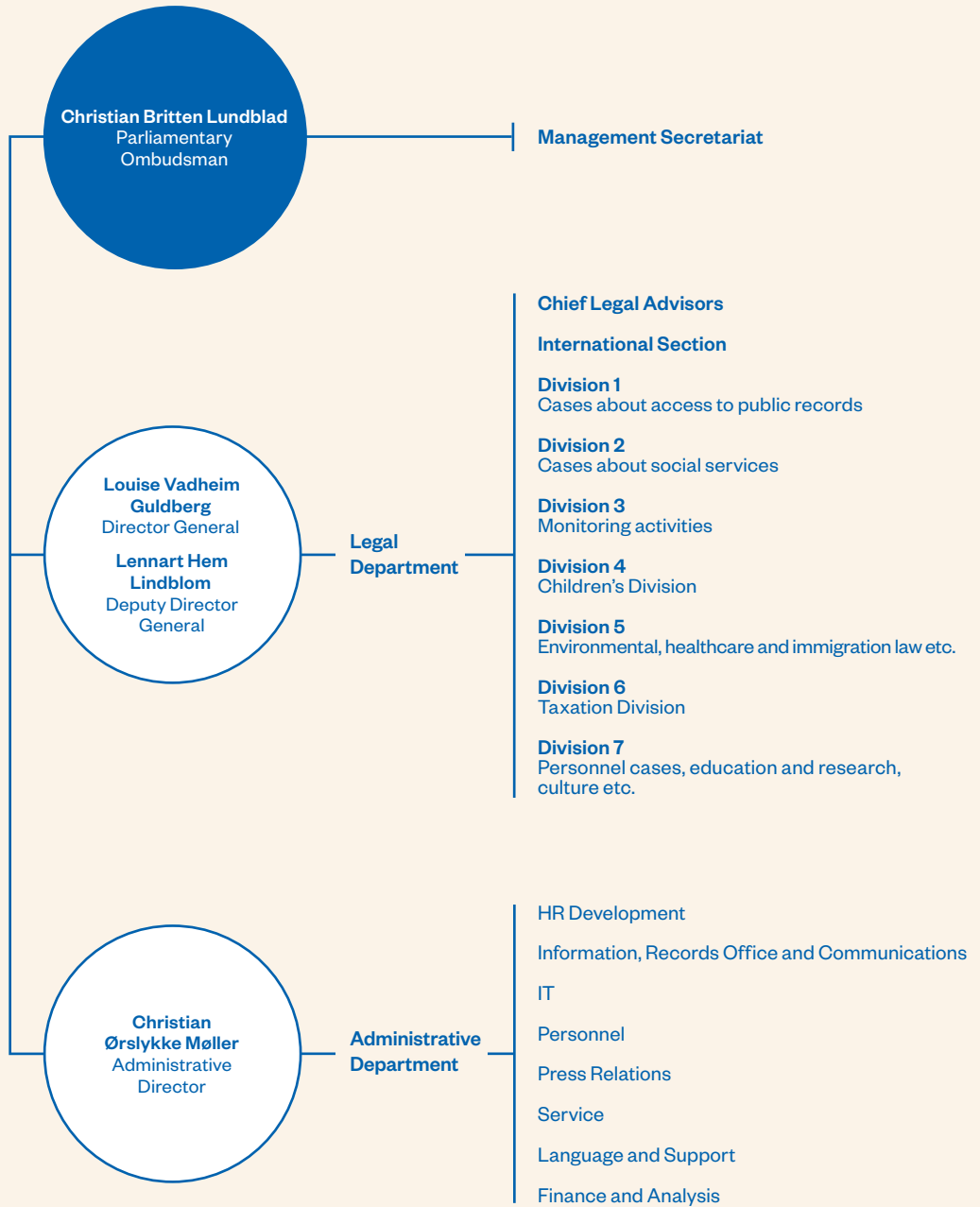
	DKK
Revenue	776,000
Expenditure	776,000
<b>Result for the year</b>	<b>0</b>

Note: Due to rounding, some totals may not correspond with the sum of the separate figures.



# **Organisation**

**As at 31 December 2025**







## Employees and core responsibilities as at 31 December 2025

### Management

Christian Britten Lundblad, Parliamentary Ombudsman  
 Louise Vadheim Guldborg, Director General  
 Lennart Hem Lindblom, Deputy Director General  
 Christian Ørslykke Møller, Administrative Director

### Management Secretariat

Mai Emilie Gori, Head of Unit  
 Marie Nyborg Kvist, Legal Advisor  
 Julie Gjerrild Jensen, Senior Communications Officer  
 Cathrine Klinthøj Larsen, Executive Secretary  
 Jannie Svendsen, Senior Administrative Officer

### Legal Department

#### Chief Legal Advisors

Morten Engberg, Chief Legal Advisor

#### International Section

Klavs Kinnerup Hede, Director of International Relations  
 Johan Stampe Müller, Legal Advisor

### Division 1

#### Cases about access to public records

Jacob Christian Gaardhøje, Senior Head of Division  
 Lise Bitsch, Deputy Head of Division  
 Marte Volckmar Kaasa, Deputy Head of Division  
 Michael Gasbjerg Thuesen, Senior Consultant  
 Helle Sidenius, Special Legal Advisor  
 Janne Lundin Vadmand, Special Legal Advisor  
 Marie Helqvist, Legal Advisor  
 Rikke Malkov-Hansen, Legal Advisor

#### Key subject areas of cases handled

- Cases about access to public records
  - The Access to Public Administration Files Act
  - The Environmental Information Act
  - The Radio and Television Broadcasting Act
  - Selected cases involving the Administration of Justice Act
  - Selected cases about press handling etc.

### Division 2

#### Cases about social services

Johannes Martin Fenger, Senior Head of Division  
 Kristine Holst Hedegaard, Deputy Head of Division  
 Mette Kildegaard Hansen, Deputy Head of Division  
 Sidsel Kathrine Møller, Senior Consultant

Anna Rechendorff Møller, Legal Advisor  
 Anna-Sophie Bager, Legal Advisor  
 Kirsten Broundal, Legal Advisor  
 Nikoline Marie Werner Isaksen, Legal Advisor  
 Stine Harkov Hansen, Legal Advisor  
 Sverre Dehnfeld Kjeldgaard, Legal Advisor  
 Tina Andersen, Legal Advisor  
 Nicholas Lundkvist Bundgaard, Legal Student Assistant

#### Key subject areas of cases handled

- Social security and labour market law

### Division 3

#### Monitoring activities

Adam Abdel Khalik, Senior Head of Division  
 Ann Thagård Gregersen, Deputy Head of Division  
 Christina Ladefoged, Deputy Head of Division  
 Anna-Sophie Kolding Saugmann-Vasi, Senior Consultant  
 Katarina Lundh Lichtenstein, Senior Consultant  
 Rikke Ipsen, Special Legal Advisor  
 Jakob Liebetrau, Legal Advisor  
 Laura Ulrich Østergaard, Legal Advisor  
 Lea Rosenlind Nielsen, Legal Advisor  
 Morten Bech Lorentzen, Legal Advisor  
 Jeanette Hansen, Senior Administrative Officer  
 Maya Krasilnikoff, Legal Student Assistant

#### The Division is in charge of the Ombudsman's monitoring activities in relation to adults, which involve in particular

- State prisons
- Local prisons
- Halfway houses
- Police detention facilities
- Departments of psychiatry
- Social and social psychiatric residential facilities
- Asylum centres
- Non-discrimination of persons with disabilities
- Forced deportations of foreign nationals

#### The Division especially handles specific cases involving

- Sentence enforcement and custody
- Psychiatric healthcare and conditions for psychiatric patients
- Social institutions

## **Division 4 Children's Division**

Louise Christophersen, Senior Head of Division  
 Anne Djurhuus, Deputy Head of Division  
 Stine Marum, Deputy Head of Division  
 Irene Rønn Lind, Psychologist and Special Advisor  
 on Children's Issues  
 Mette Ravn Jacobsen, Special Legal Advisor  
 Ulla Birgitte Frederiksen, Special Legal Advisor  
 Camilla Holst-Andersen, Legal Advisor  
 Hanne Nørgård, Legal Advisor  
 Maria Elisabeth Willert, Legal Advisor  
 Marianne Halkjær Ebbesen, Legal Advisor  
 Nina Redder, Legal Advisor  
 Yasaman Mesri, Legal Advisor  
 Emilie Bentien Andersen, Legal Student Assistant  
 Sigrid Roth, Legal Student Assistant

### **The Children's Division carries out monitoring visits to public institutions where children reside and to private institutions etc. which carry out tasks directly in relation to children, such as**

- Children's and young people's homes, including private accommodation facilities
- State and local prisons
- Child and adolescent departments in hospitals, including departments of psychiatry
- Foster families
- Asylum centres

### **The Children's Division especially handles specific cases involving**

- Support measures for children and young people
- Primary and lower secondary schools, continuation schools and private schools
- Institutions for children
- Other cases with a particular bearing on children's rights

## **Division 5 Environmental, healthcare and immigration law etc.**

Susanne Veiga, Senior Head of Division  
 Jørgen Hejstvig-Larsen, Deputy Head of Division

Pernille Bjørnholt, Deputy Head of Division  
 Lisbeth Adserballe, Senior Consultant  
 Klaus Tranbjerg Toftgaard, Special Legal Advisor  
 Sofie Hedegaard Larsen, Special Legal Advisor  
 Andrea Kjærulff Tønnesen, Legal Advisor  
 Helene Qvist Petersen, Legal Advisor  
 Lars Lyng Dahlgaard, Legal Advisor  
 Neel Muus Larsen, Legal Advisor  
 Sabine Heestermans Svendsen, Legal Advisor  
 Andrea Marie Thing-Christiansen, Legal Student Assistant  
 Nikita Risager Øbakke, Legal Student Assistant

### **Key subject areas of cases handled**

- Environment and planning
- Building and housing
- Energy
- Food and agriculture
- Municipalities and regions etc.
- The non-psychiatric healthcare sector
- Foreign nationals
- The Guide for Authorities on the Ombudsman's website

## **Division 6 Taxation Division**

Stephan Andreas Damgaard, Senior Head of Division  
 Camilla Bang, Deputy Head of Division  
 Martin Dyhl-Polk, Deputy Head of Division  
 Lise Puggaard, Senior Consultant  
 Eva Vindsebæk Sjøgren, Special Legal Advisor  
 Jeanett Dejgaard Stefansen, Special Legal Advisor  
 Franz Amdi Hansen, Legal Advisor  
 Linnea Eliassen, Legal Advisor  
 Mai Vestergaard, Legal Advisor  
 Rasmus Steensig Jensen, Legal Advisor  
 Signe Brehm Jensen, Legal Advisor  
 Mathilde Weber Leen Olsson, Legal Student Assistant  
 Nikoline Ervolder Svendsen, Legal Student Assistant

### **Key subject areas of cases handled**

- Direct taxes
- Indirect taxes, including value-added tax, etc.
- Levying and collection of taxes

## Division 7

### Personnel cases, education and research, culture etc.

Kirsten Talevski, Senior Head of Division  
Nanna Flindt, Deputy Head of Division  
Vibeke Lundmark, Deputy Head of Division  
Lise Brandi-Hansen, Senior Consultant  
Linette Granau Winther, Special Legal Advisor  
Camilla Ørskov Christiansen, Legal Advisor  
Mariam Moussa Rihani, Legal Advisor  
Marjanne Kalsbeek, Legal Advisor  
Pernille Helsted, Legal Advisor  
Emilie Kroer Ludvigsen, Legal Student Assistant  
Jakob Hulgaard, Legal Student Assistant

#### Key subject areas of cases handled

- Public employment law, including public employees' freedom of speech
- Education and research
- The Prosecution Service and criminal cases etc.
- Traffic, passports, weapons etc.
- Elections, registration of individuals etc.
- Ecclesiastical affairs and culture
- Trade and industry etc.
- Transport, communication and roads

## Administrative Department

Christian Ørslykke Møller, Administrative Director

### HR Development

Lisbeth Kongshaug, Head of Unit  
Mai Emilie Gori, Special Legal Advisor  
Marie Nyborg Kvist, Legal Advisor  
Jannie Svendsen, Senior HR and Development Administration Officer  
Neel Aggestrup, Senior HR and Development Administration Officer

### Information, Records Office and Communications

Karen Nedergaard, Head of Unit  
Anna Skov Fougat, Librarian  
Eva Jørgensen, Senior Communications Officer  
Denise Schärfe, Senior Records Officer  
Harriet Lindegaard Hansen, Senior Records Officer  
Charlotte Charboe Andersen, Senior Records Assistant

## IT

Seyit Ahmet Özkan, Head of Unit  
Kevin Pedersen, IT Systems Administrator  
Uffe Larsen, IT Officer  
Mads Richard Nielsen, IT Student Assistant  
Rasmus Alexander Christiansen, IT Student Assistant

### Personnel

Mette Vestentoft, Head of Unit  
Julie Roland, Senior Personnel Officer  
Lone Gundersen, Senior Personnel Officer  
Tine Marie Nielsen, Senior Personnel Officer

### Press Relations

Martin Østergaard-Nielsen, Special Communications Advisor

### Service

Jeanette Schultz, Head of Unit  
Elisabeth Olsen, Receptionist  
Amalie Herløv Nielsen, Service Assistant  
Annitta Lundahl, Service Assistant  
Charlotte Jørgensen, Service Assistant  
Flemming Wind Lystrup, Service Assistant  
Ghenet Teklemicael Tesfaslasie, Service Assistant  
Katarzyna Sztukowska-Thomsen, Service Assistant  
Kirsten Morell, Service Assistant  
Niels Clemmensen, Service Assistant  
Suphaporn Nielsen, Service Assistant

### Language and Support

Mette Vestentoft, Head of Unit  
Lisbeth Nielsen, Senior Language Officer  
Marianne Anora Kramath Jensen, Senior Language Officer  
Sara Krogsgaard-Hjorth, Senior Language Officer

### Finance and Analysis

Camilla Nexø Klitgaard, Head of Unit  
Jeanette Schultz, Senior Finance Officer



### **Whistleblowing system**

In accordance with the Act on Protection of Whistleblowers (Act No. 1436 of 29 June 2021, as amended by Act No. 666 of 11 June 2024), the Parliamentary Ombudsman has established a whistleblowing system. The whistleblowing system is internal to the Ombudsman Office. No concerns were reported to the whistleblowing unit of the Ombudsman Office in 2025.

Appendix

**General information  
about the Danish  
Parliamentary  
Ombudsman and  
about monitoring  
visits under the  
OPCAT mandate**

# 1

## General information about the Danish Parliamentary Ombudsman

### The task of the Parliamentary Ombudsman

The Danish Parliamentary Ombudsman was established in 1955 following a constitutional amendment in 1953. The general background to introducing a Parliamentary Ombudsman was a wish to improve the protection of citizens' legal rights vis-à-vis public authorities.

The primary task of the Parliamentary Ombudsman is to help ensure that administrative authorities act in accordance with the law and good administrative practice, thus protecting citizens' rights vis-à-vis the authorities. An additional function of the Ombudsman is to support and promote good administrative culture within the public administration.

The Parliamentary Ombudsman is not the National Human Rights Institution of Denmark. The Danish Institute for Human Rights carries out this mandate.

### Relationship to Parliament and jurisdiction

The Parliamentary Ombudsman is governed by the Ombudsman Act.

The Parliamentary Ombudsman is organisationally linked to the Danish Parliament. After each general election and whenever a vacancy occurs, Parliament elects an Ombudsman. Further, Parliament may dismiss the Ombudsman if the person holding the office no longer enjoys its confidence. However, the Ombudsman Act

stipulates that the Ombudsman is independent of Parliament in the discharge of his functions.

Under the Ombudsman Act, the jurisdiction of the Parliamentary Ombudsman extends to all parts of the public administration: the state, the regions, the municipalities and other public bodies.

Parliament – including its committees, the individual members of Parliament, the Administration of Parliament and other institutions under Parliament – is outside the Ombudsman's jurisdiction. Thus, the Ombudsman is generally precluded from considering complaints regarding the isolated effects of a statutory provision or its compliance with the Constitution and international law. However, if any deficiencies in existing statutes or administrative regulations come to the Ombudsman's attention in specific cases, the Ombudsman must notify Parliament and the responsible minister. Further, the Ombudsman Act states that the Ombudsman must monitor that existing statutes and administrative regulations are consistent with, in particular, Denmark's international obligations to ensure the rights of children, including the UN Convention on the Rights of the Child.

Courts of justice are outside the Ombudsman's jurisdiction, and the same applies to court-like bodies and tribunals that make decisions on disputes between private parties. With a few exceptions, the Ombudsman cannot consider complaints about private establishments either.

The Danish Parliamentary Ombudsman is located in Copenhagen and has no branch offices. The Faroe Islands and Greenland both have their own ombudsman, with jurisdiction in relation to issues falling under the remit of the

home rule administration in the case of the Faroe Islands and the self-government administration in Greenland's case. Issues relating to the Faroe Islands and Greenland which fall under the remit of central administrative authorities of the Realm of Denmark are within the jurisdiction of the Danish Parliamentary Ombudsman.

### Working methods

The Parliamentary Ombudsman investigates complaints, opens investigations on his own initiative and carries out monitoring activities. Investigating complaints from citizens is a core function of the Ombudsman.

#### Complaint cases

In principle, anybody can complain to the Ombudsman, also if they are not a party to a case. Complaining to the Ombudsman is free. A complainant cannot be anonymous.

The Ombudsman considers complaints about all parts of the public administration and in a limited number of situations also about private institutions, an example being complaints about conditions for children in private institutions.

The Ombudsman does not consider complaints about courts, nor about court-like bodies or tribunals which make decisions on disputes between private parties.

The Ombudsman's task is to ensure that the authorities have observed the applicable rules. For this reason, the Ombudsman cannot consider cases before the authorities; he can consider a complaint only if the case has been considered by the relevant authority – and by any appeals bodies.

There is a deadline of one year for complaints to the Ombudsman.

When the Ombudsman receives a complaint, he first determines whether it offers sufficient cause for investigation. In some cases, the Ombudsman is unable under the Ombudsman Act to consider a complaint – for instance if the one-year deadline for complaints has been exceeded or if the case has not been considered by the relevant appeals body. In other cases, the Ombudsman chooses not to open an investigation, for instance because he would not be able to help the citizen achieve a better outcome.

In a large proportion of complaint cases, the Ombudsman helps the citizen by providing guidance or by forwarding the complaint to the relevant authority, for instance in order that the authority will be able to consider the complaint or give the citizen more details of the grounds for a decision which it has made.

In a number of cases, the Ombudsman discontinues his investigation because the authority chooses to reopen the case, for instance after being asked for a statement on the matter by the Ombudsman.

In some complaint cases, the Ombudsman carries out a full investigation, in which, among other things, he asks the authority to send him a statement on the matter. The investigation may result in the Ombudsman criticising the authority and recommending that it make a new decision.

#### Own-initiative investigations

As mentioned above, investigating complaints from citizens is a core function of the Ombudsman. However, opening investigations on his own initiative is also a high priority for the Ombudsman.

The Ombudsman may open the following types of investigation on his own initiative:

- investigations of specific cases
- general investigations of an authority's processing of cases

An example of a topic for a general investigation could be whether an authority's interpretation and application of specific statutory provisions or its practice in a specific area is correct.

#### *Objectives of own-initiative investigations*

One of the main objectives of also giving high priority to own-initiative investigations is to identify recurring errors made by authorities. Investigations of this type can have a great impact on authorities' case processing, thus helping a large number of citizens at once.

In an own-initiative investigation, the focus is not only on errors that the authority may already have made – but also on preventing errors being made in the first place.

In addition, the Ombudsman opens investigations on his own initiative of specific cases of a more one-off nature if he finds cause to look further into a case.

#### *Backgrounds to opening own-initiative investigations*

In practice, the Ombudsman mainly opens own-initiative investigations of themes and within areas with one or more of the following characteristics:

- There is an aspect of fundamental public importance.
- Serious or significant errors may have been made.

- They concern matters which raise special issues in relation to citizens' legal rights or which are otherwise of great significance to citizens.

Specific complaint cases or monitoring visits may give rise to suspicion of recurring errors etc. and be the launch pad for an own-initiative investigation. When the Ombudsman is investigating a specific case, his focus is therefore, among other things, on problems which characterise not only that particular case.

Media coverage of a case may also cause the Ombudsman to open an investigation on his own initiative. The Ombudsman monitors both local and national media.

Further, external parties – such as professional committees for practising lawyers or accountants or interest groups – can be useful sources of knowledge about recurring errors etc. on the part of authorities.

In addition, the Ombudsman chooses some general themes each year for his monitoring activities in relation to adults and children and for the Taxation Division.

#### *What characterises the Ombudsman's work on own-initiative investigations?*

The Ombudsman's own-initiative investigations comprise a variety of activities with the common denominator that they are not centred on a complaint in a specific case as the focus is usually expanded beyond specific problems to a more general level, with emphasis on any general and recurring errors or problems.

Further, own-initiative investigations typically have a more forward-looking focus, centring on how the authorities involved can handle and rectify errors and problems.

In some own-initiative investigations, the Ombudsman reviews a number of specific cases from an authority.

In others, the Ombudsman asks an authority for a statement about, for instance, its administration, its interpretation of the law, its practice or its processing times within a specific area.

The Ombudsman is working on an ongoing basis on a variety of own-initiative investigations where he considers, based on, for instance, specific complaint cases, legislative changes or media coverage, whether there is a basis for further investigation. Thus, the Ombudsman decides and prioritises on an ongoing basis which issues or areas give cause for investigation.

In some cases, the Ombudsman's own investigation leads to the assessment that there is no cause to contact the authorities involved, and the case can be closed without a full Ombudsman investigation. The Ombudsman may also decide to close a case without a full investigation after contacting the authorities.

### Monitoring activities

The Ombudsman carries out monitoring visits to places where there is a special need to ensure that citizens are treated with dignity and consideration and in accordance with their rights by the authorities – for instance because the citizens are deprived of their liberty or otherwise in a vulnerable position.

Monitoring visits are made to a number of public and private institutions etc., such as

- Institutions under the Danish Prison Service
- departments of psychiatry
- social residential facilities
- residential institutions for children and young people

In addition, the Ombudsman monitors

- forced deportations of foreign nationals
- forced deportations arranged by other EU member states at the request of the European Border and Coast Guard Agency, Frontex

Finally, the Ombudsman monitors the physical accessibility of public buildings, such as educational establishments or health institutions, to persons with disabilities.

The Ombudsman's monitoring obligations follow from the Ombudsman Act and from the rules governing the special responsibilities which the Ombudsman has been assigned:

- The Ombudsman carries out monitoring visits in accordance with Section 18 of the Ombudsman Act, especially to institutions where people are deprived of their liberty.
- The Ombudsman has been designated 'National Preventive Mechanism' (NPM) under the Optional Protocol to the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT). The task is carried out in collaboration with DIGNITY – Danish Institute Against Torture and the Danish Institute for Human Rights (IMR), which contribute with medical and human rights expertise.
- The Ombudsman has a special responsibility to protect the rights of children under the UN Convention on the Rights of the Child etc.
- The Ombudsman has been appointed to monitor forced deportations of foreign nationals.
- The Ombudsman monitors developments regarding equal treatment of persons with disabilities at the request of Parliament.

Monitoring visits to institutions etc. are physical visits by a visiting team, who speak with residents, inmates, patients etc., staff and the management and look at the physical environment.

The monitoring of a forced deportation involves a member of the Ombudsman's staff being present during the whole or part of the deportation. In addition, the Ombudsman's monitoring of forced deportations includes a review of the case files of a number of the deportation cases concluded during the preceding year.

Monitoring visits are carried out by Ombudsman staff, in many cases with participation of external collaborative partners or consultants. Depending on the type of monitoring visit, the Ombudsman collaborates with

- medical doctors from DIGNITY – Danish Institute Against Torture
- human rights experts from the Danish Institute for Human Rights
- Two accessibility consultants who both have a disability

During monitoring visits, the Ombudsman often makes recommendations to the institutions. Recommendations are typically aimed at improving conditions for residents, inmates, patients etc. and in this connection also at bringing conditions into line with the rules. Recommendations may also be aimed at preventing, for instance, degrading treatment.

In addition, monitoring visits may cause the Ombudsman to open own-initiative investigations of general problems.

## Powers

### Tools of investigation

Under the Ombudsman Act, the Ombudsman has a set of tools at his disposal when carrying out investigations. Firstly, authorities etc. within the Ombudsman's jurisdiction are required to

furnish the Ombudsman with such information and to produce such documents etc. as he may demand. Secondly, the Ombudsman may demand written statements from authorities etc. within his jurisdiction. Thirdly, the Ombudsman may inspect authorities etc. within his jurisdiction and must be given access to all their premises.

### Assessment and reaction

The Ombudsman's assessment of a case is a legal assessment. In connection with monitoring activities, however, the Ombudsman may also include universal human and humanitarian considerations in his assessment. The Ombudsman only considers the legal aspects of cases and not matters which require other specialist knowledge, such as medical matters. Further, the object of the Ombudsman's investigations is the acts or omissions of public authorities, not the acts or omissions of individual public servants.

Under the Ombudsman Act, the Ombudsman may express criticism, make recommendations and otherwise state his views of a case, typically by criticising a decision or recommending that the authority change or review its decision. The authorities are not legally obliged to comply with the Ombudsman's recommendations, but in practice, they follow his recommendations.

The Ombudsman may recommend that a complainant be granted free legal aid in connection with any matter within his jurisdiction.

If the Ombudsman's investigation of a case reveals that the public administration must be presumed to have committed errors or derelictions of major importance, he must notify Parliament's Legal Affairs Committee and the relevant minister or municipal or regional council.

## Organisation

Under the Ombudsman Act, the Ombudsman engages and dismisses his own staff. The Ombudsman employed 128 people as at 31 December 2025, 62.5 per cent of them law graduates.

The management of the Ombudsman Office consists of the Ombudsman, the Director General, the Deputy Director General and the Administrative Director. A management secretariat and an international section support the management.

The Ombudsman Office has two departments, a legal department and an administrative department, which are further divided into a number of divisions and units, respectively.

The Ombudsman's annual budget is approximately EUR 15.5 million.

## 2 General information about monitoring visits under the OPCAT mandate

In 2009, the Danish Parliament passed an amendment to the Ombudsman Act enabling the Ombudsman to act as National Preventive Mechanism (NPM) under the Optional Protocol to the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT). In the same year, the Ombudsman started carrying out the functions of the NPM.

### Is the NPM independent?

The functions of the NPM are carried out as an integral part of the Ombudsman's work. The Ombudsman is independent of the executive power and is appointed by the Danish Parliament. The Ombudsman is independent of Parliament in the discharge of his functions.

### Does the NPM have the necessary professional expertise?

The members of the Ombudsman's staff primarily have legal expertise. However, the Ombudsman's psychologist and special advisor on children's issues participates in monitoring visits to institutions etc. for children. The Danish Institute for Human Rights contributes with human rights expertise, and DIGNITY – Danish Institute Against Torture contributes with medical expertise.

### Does the NPM have the necessary financial resources?

The costs of exercising the functions of the NPM are financed via the overall appropriation for the Ombudsman.

### Are monitoring visits carried out on a regular basis?

Approximately 30 monitoring visits to institutions for adults and 10 to 12 visits to institutions etc. for children are carried out per year.

### What types of institutions are monitored?

**The Ombudsman monitors, among others, the following types of institutions where adults may be deprived of their liberty:**

*State prisons* are run by the Danish Prison Service and receive convicted persons who are to serve a sentence. State prisons may be closed or open. Closed prisons are characterised by a high degree of security and control, whereas inmates in open prisons may be able to work or take part in training or education outside the prison. However, there are also clear limits to inmates' freedom of action in open prisons.

*Local prisons* are run by the Danish Prison Service and receive arrestees, remand prisoners and in certain cases convicted persons who are to serve a sentence. Local prisons are characterised by a high degree of security and control.

*Halfway houses* are run by the Danish Prison Service and are used especially for the rehabilitation of convicted persons who are serving the last part of their sentence. Compared to prisons, halfway houses may have a high degree of freedom.

*Immigration detention centres* are run by the Danish Prison Service and receive foreign nationals who are to be detained, as a general rule not for a criminal offence but for reasons relating to the Aliens Act.

*Departure centres* are run by the Danish Prison Service and receive rejected asylum seekers, persons sentenced to deportation and persons with tolerated residence status. The residents are not under detention and are therefore free to come and go. As a general rule, however, they are required to reside at the centre, including to spend the nights there.

*Asylum centres* are run by municipalities and the Danish Red Cross and comprise, among others, reception centres, where asylum seekers stay the first weeks after arrival, and residential centres, where they stay while the authorities are considering their application for asylum.

*Police detention facilities* are used to detain persons who are unable to take care of themselves, for instance due to intoxication.

*Police holding cells* are used for detentions of very short duration without overnight stays.

*Departments of psychiatry* are run by regions and receive psychiatric patients. Departments may be open (with unlocked outer doors), closed (with locked outer doors) or integrated (with

outer doors or doors to certain sections being locked according to patients' needs). There are also departments of forensic psychiatry, which receive, among others, patients with an order for placement or treatment in a department of psychiatry.

*Social residential facilities* are run by regions, municipalities or private parties and receive persons with impaired cognitive or physical function. In addition, they receive persons with an order for placement in a social residential facility. Outer doors are unlocked, except in secure wards.

*Care homes* are run by municipalities or private parties and receive persons with an extensive need for personal care, healthcare and extra support in their daily lives.

**The Ombudsman monitors, among others, the following types of institutions etc. where children and young people may be placed:**

*Open residential institutions* are run by municipalities or regions and receive children and young people belonging to the target group for which the institution has been approved. The target group may be defined in terms of age but may also be defined in terms of needs, diagnoses or disabilities.

*Partly closed residential institutions and partly closed wards in residential institutions* are run by municipalities or regions and receive children and young people with criminal behaviour, substance abuse or other behavioural problems. In these institutions and wards, residents may be detained by periodic locking of windows and outer doors.

*Secure residential institutions and high secure wards in residential institutions* are run by municipalities or regions and receive children and young people in order to prevent them harming themselves or others or for observation or treatment. These institutions and wards may also receive, among others, young people to be remanded in non-prison custody during investigation of their case or convicted young people who are to serve a sentence. Windows and outer doors may be constantly locked, and placements of short duration in a solitary confinement room are permitted.

*Accommodation facilities* are run by private parties, such as foundations or enterprises, and receive children and young people belonging to the target group for which the facility has been approved.

*Foster families* are either general, reinforced, specialised or network foster families. A foster family may foster children and young people belonging to the target group for which it has been approved. Reinforced foster families may foster children and young people with moderate to high support needs, whereas specialised foster families may foster children and young people with high support needs.

*Inpatient units of departments of child and adolescent psychiatry* are run by regions and receive children and young people for examination or treatment of psychiatric disorders.

*Asylum centres for unaccompanied underage asylum seekers* are run by municipalities and the Danish Red Cross and are residential centres where unaccompanied underage asylum seekers stay while the authorities are considering their application for asylum.

## How are monitoring visits carried out?

A monitoring visit is a physical visit. Before or following the visit, the Ombudsman will ask for various information, for instance reports of incidents involving use of force, records of statements taken prior to the sanction of placement in a disciplinary cell being imposed, or information from parents or other relatives. During the visit, the Ombudsman's visiting team will speak with residents, inmates, patients etc., staff and the management.

The Ombudsman has designated the following general focus areas for his monitoring visits:

- use of force or coercion and other interventions and restrictions
- relations
- occupation, education and leisure time
- healthcare-related conditions
- safety for the residents, inmates, patients etc.
- sector transfers

The prioritisation of the individual focus areas depends on the institutions etc. visited. During specific monitoring visits, the Ombudsman may also focus on other issues, for instance buildings in a poor state of repair.

In most cases, recommendations are made to the management of the institution already during the monitoring visit.

Following the visit, the visiting team will prepare a memorandum of the visit, and the Ombudsman will subsequently send a closing letter to the institution and the responsible authorities with his recommendations.

DIGNITY – Danish Institute Against Torture and the Danish Institute for Human Rights normally take part in preparing, carrying out and following up on monitoring visits.

Each year, the Ombudsman chooses, together with DIGNITY – Danish Institute Against Torture and the Danish Institute for Human Rights, one or more themes for the year’s monitoring visits to institutions etc. for adults and children, respectively. A large proportion of the monitoring visits carried out during the year will be to institutions etc. where one of the themes is relevant. A theme could be, for instance, disciplinary cells or younger children placed in social care.

After the year’s monitoring visits have been carried out, the Ombudsman prepares a separate report on the year’s work in relation to each of the themes for the Ombudsman’s monitoring visits to institutions etc. for adults and children. The reports summarise and present the most important results in relation to the themes. Results may be general recommendations to the responsible authorities, for instance a recommendation to see that institutions draw up policies on prevention of violence and threats among residents. The reports are also used as a starting point for discussions with key authorities about general problems.

Monitoring visits may cause the Ombudsman to open cases on his own initiative, with, among others, the authorities which have the remit for the relevant areas. This may be the case, for instance, with general problems which affect not only the specific institution visited. An example of such a case opened on the Ombudsman’s own initiative was an investigation of whether it was permitted to initiate various types of interventions in relation to psychiatric patients without statutory authority.

### **Does the Ombudsman submit proposals and observations regarding existing legislation or drafts for legislation?**

The Ombudsman monitors that the authorities observe the conventions within the framework of Danish legislation.

The more politico-legal and advisory tasks in relation to the legislature are carried out by other bodies, such as the Ombudsman’s collaborative partners in the discharge of his functions as NPM (i.e. the Danish Institute for Human Rights and DIGNITY – Danish Institute Against Torture). According to an established practice, the Ombudsman does not submit consultation responses on bills, with the exception of bills affecting matters which relate to the Ombudsman Office itself.

The Ombudsman can notify the responsible minister and Parliament if a statute or the state of the law in a specific area is not consistent with Denmark’s international obligations and a legislative change may therefore be required.

