Fra:	Carlotta Alloero
Til:	Kirsten Skov
Cc:	Jeannette Woellenstein
Emne:	RE: Follow up on request for a statement from ISS
Dato:	28. september 2026 13:01:27
Vedhæftede filer:	image001.jpg image.png

[EKSTERN E-MAIL] Denne e-mail er sendt fra en ekstern afsender.
Vær opmærksom på, at den kan indeholde links og vedhæftede filer, som ikke er sikre.

Dear Ms Skov,

Thank you for consulting ISS and for the opportunity to provide our position following our discussion on 21 September. Please accept our apologies for the delay in replying: we wished to discuss the matter carefully within ISS before providing our position.

Having considered the request and the nature and content of the document concerned, ISS respectfully objects to the disclosure of the April 2026 "Search for Origins – India" factsheet.

In preparing this response, ISS has taken into account the provisions of the Danish Access to Public Administration Files Act (Offentlighedsloven) that appear relevant to the request, in particular section 33(5), concerning other private and public interests where confidentiality is required by the special nature of the matter; section 33(4), concerning original ideas and unpublished research; and section 30(2), concerning information on the operational or business matters of the organisation concerned.

Our concerns are not based simply on ISS's status as the author of the document. They relate in particular to the confidential nature of a significant part of the information; the purpose for which the factsheet was prepared; the fact that it was produced as part of a paid professional service provided by ISS; the protection of the relationships through which ISS obtains information, and the potential consequences of disclosure for the future provision of professional technical assistance.

1. Purpose and professional nature of the factsheet

The factsheet was prepared by the ISS/International Reference Centre for the rights of children deprived of their families (ISS/IRC) as part of its technical support to Central Authorities and other professionals working on search for origins.

It was prepared as a professional working document, reflecting information and assessments available to ISS at the time of its preparation. It was not intended as a publication for the general public or as guidance for individuals undertaking a search for origins independently.

In particular, the document should be understood in its professional context and together with the methodology, qualifications and limitations underlying the information collected by ISS.

2. Information obtained through professional and confidential exchanges

A substantial and clearly identifiable part of the factsheet derives from the ISS 2026 mission in India and from information provided by ISS local contacts.

During the mission, ISS met with child protection authorities, specialised adoption agencies, legal professionals, NGOs and other stakeholders. These exchanges took place in the context of professional cooperation and were essential to enabling ISS to understand how search for origins operates in practice.

The factsheet expressly distinguishes such findings from information derived from legislation and publicly available sources. For example, the sections concerning illicit practices, willingness to acknowledge past irregularities, access to records, response times, counselling, and general challenges contain findings and observations arising from the 2026 mission and/or ISS local

contacts.

Disclosure of this material outside its intended professional context could undermine the trust on which such exchanges depend and could make authorities, professionals and other local contacts less willing to share information with ISS in the future. This would directly affect ISS's ability to obtain reliable and current information and, consequently, its ability to provide technical assistance to Central Authorities, including the Danish authorities.

ISS therefore asks the Board to take these considerations into account when assessing whether disclosure would engage the relevant exceptions to the right of access, including those concerning protected public interests and confidential information.

3. Sensitive information concerning search for origins

The subject matter of the factsheet is inherently sensitive. Search for origins may involve adopted persons, birth parents and other members of birth families, including circumstances surrounding relinquishment, anonymity, access to records and possible irregularities in past adoption practices.

The factsheet contains observations concerning, among other matters, the protection of the privacy of birth parents, the difficulties in tracing birth families, the availability and preservation of records, and possible illicit practices.

ISS's concern is not that information concerning search for origins should never be made available. Rather, disclosure of this particular professional document should be assessed in light of the sensitivity of the information and the context in which it was obtained and analysed.

4. Risk of misleading disclosure or selective use

ISS is also concerned about the risk that the factsheet, or individual passages from it, could be circulated or relied upon without the professional context in which they were prepared.

The document combines legislation and publicly available material with information obtained through ISS's 2026 mission and local contacts, as well as ISS's professional assessment of the information available to it at that time.

This is particularly relevant to the sections concerning illicit practices and the findings of the 2026 mission. Selective disclosure of individual passages could give a materially different impression from that conveyed by the document as a whole and could lead to conclusions about the situation in India, individual actors, or ISS's own work that the factsheet itself does not purport to establish.

ISS would therefore ask the Board to consider, where relevant, the provisions of the Offentlighedsloven concerning the protection of public and private interests and the disclosure of documents where partial disclosure could result in clearly misleading information.

5. Professional use and intellectual property

The factsheet is an original work produced by ISS/IRC and reflects specialised expertise and analysis developed through ISS's work in the field of search for origins. Unless otherwise indicated, the factsheet and the original ISS/IRC content it contains are protected by copyright and remain the intellectual property of ISS/IRC (© ISS/IRC).

While ISS recognises that intellectual property considerations do not, in themselves, determine the application of the Danish access rules, they further support the importance of preserving the professional context and controlled use of the document.

6. ISS's request

In light of the above, ISS respectfully requests that the Board decline the request for access to the factsheet.

ISS considers that these considerations apply to the document as a whole, in particular because the document combines publicly available material with information and assessments derived from

professional exchanges and the 2026 ISS mission. Removing or disclosing only selected passages could also deprive the document of its necessary context.

This does not prevent the Danish authorities from drawing on the information contained in the factsheet to inform the requester, in general terms, about search for origins procedures in India. ISS would, however, ask that the authorities refrain from quoting or reproducing concrete extracts from the document.

Should the Board nevertheless consider that access must be granted to all or part of the document, ISS respectfully asks that the Board:

- carefully assess whether the information derived from the 2026 ISS mission and ISS local contacts can be disclosed;
- consider whether partial or extract-based disclosure would result in a clearly misleading presentation of the information;
- provide the factsheet in its entirety rather than as selected extracts, if disclosure is nevertheless considered legally required;
- clearly indicate that the document reflects information available to ISS as of April 2026, was prepared for professional use, and does not constitute legal advice or individual search-for-origins guidance; and
- inform ISS of the Board's final decision before any disclosure takes place.

ISS remains available to provide any further information the Board may require in assessing the confidentiality and professional context of the document.

Yours sincerely,

(on behalf of the ISS) Carlotta

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De: Kirsten Skov <ksko@ast.dk>
Envoyé: Jeudi 24 septembre 2026 12:42
À: Carlotta Alloero <Carlotta.Alloero@iss-ssi.org>
Objet: Follow up on request for a statement from ISS

Dear Carlotta

Thank you again for a very good meeting last Monday. I hope you are doing well.

I imagine you are very busy, but I just wanted to follow up and ask if you have had a chance to consider the request?

I look forward to hearing from you.

Kind regards

Kirsten Skov
Special adviser

The National Social Appeals Board
Intercountry Adoption
Central Authority of Denmark

Phone: + 45 41 99 18 08
Mail: ksko@ast.dk

Fra: Kirsten Skov
Sendt: 13. august 2026 18:16
Til: 'Carlotta.Alloero@iss-ssi.org' <Carlotta.Alloero@iss-ssi.org>
Emne: Request for a statement from ISS

Dear Ms Alloero

I hope this e-mail finds you well.

As I have just written to you, we once again need your feedback. I would therefore be grateful if you could get back to me at your earliest convenience.

Please find the attached files for your review and further action. Kindly let me know if you require any additional information or clarification.

I greatly appreciate our collaboration on this matter.

Kind regards

Kirsten Skov
Special adviser

The National Social Appeals Board
Intercountry Adoption
Central Authority of Denmark

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