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CREDIBILITY IN ADMINISTRATIVE LAW

Abstract

Addressing the issue of credibility in administrative law in this article stems from the aspirations of the theory and practice of administration to obtain 'good' administration, characterised by legality of actions taken, correct assessment of the facts when issuing decisions, efficiency, cost-effectiveness and reliability. The purpose of this article is to present the issue of credibility in administrative law. The subject of the article includes, amongst others, the characterisation and systematisation of the notion of credibility in light of administrative law and an analysis, in this context, of the legal status and the hitherto scientific output addressing the issue of the legal foundations of administrative functioning and lawmaking & application of administrative law. The result of the considerations carried out within the framework of this article is the identification of the legal factors determining the achievement of credibility as a desirable feature in the activities of public administration and other entities whose rights and obligations are regulated by administrative law.

Keywords: *credibility, trust, law, administration*

Introduction

Credibility applies to many areas of human activity. It is usually understood as a quality of someone or something which is unquestionable and one that we can trust. Due to its interdisciplinary nature, the feature of credibility of entities, objects of processes and phenomena constitutes a research plane of the exact sciences and natural sciences as well as the social sciences, including

law, economics and finance, management and quality sciences, sociological sciences, and security studies.

In legal and administrative sciences, the attribute of credibility can be studied in different approaches and aspects. Indeed, the attribute of credibility can be considered in terms of methodological and actual, subject and object, and also systemic, substantive or procedural aspects. Credibility can also be used as an evaluation criterion or as one of the desirable characteristics in the process of making or applying administrative law.

Addressing the issue of credibility in administrative law in this article stems from the aspirations of the theory and practice of administration to obtain 'good' administration, characterised by legality of actions taken, correct assessment of the facts when issuing decisions, efficiency, cost-effectiveness and reliability. The purpose of this article is to present the issue of credibility in administrative law. The subject of the article includes, amongst others, the characterisation and systematisation of the notion of credibility in light of administrative law and an analysis, in this context, of the legal status and the hitherto scientific output addressing the issue of the legal foundations of administrative functioning and lawmaking & application of administrative law. The result of the considerations carried out within the framework of this article is the identification of the legal factors determining the achievement of credibility as a desirable feature in the activities of public administration and other entities whose rights and obligations are regulated by administrative law.

The notion of credibility

The notion of credibility relating to trust and the absence of doubt can be considered in subjective and objective terms. In subjective terms, the attribute of credibility (or lack thereof) refers to natural persons as well as legal entities, businesses, state authorities and other formalised organisations. In objective terms, credibility can characterise specific activities, processes and tangible or intangible things. Credibility is one of the evaluation criteria. Indeed, as I. Irwin points out, "an evaluation can be understood as any statement in which a given fragment of reality is assigned a certain value (positive or negative)"

(M. Lewandowski, 1965, pp. 55-56. Evaluation is usually understood as an expression of a judgment about the reality that is being described. Sometimes the evaluation is narrowed down to certain aspects. T. Kotarbiński, for example, does not refer to arbitrary evaluation, but the so-called practical evaluations, which include "evaluations that do not express feelings or emotions, but speak about the usefulness or uselessness of a given factor involved in an action, i.e. the perpetrator, the tool, etc." (T. Kotarbiński, 1975, p. 345). Credibility meets the above-mentioned prerequisites of "practical evaluations". For example, the credibility criterion can be used to evaluate the results of research and analyses, testimonies and explanations, management or security systems, financial standing and creditworthiness, information, documents, accounting books and financial statements, as well as organizational, legal and financial preparation for the proper conduct of certain types of economic activity. Credibility is also related to authenticity and truthfulness (M.Miszczak, 2020, p.54). Therefore, it is of great importance for any activity, the effectiveness of which is determined by correct determination of the actual state or planning.

In light of the above considerations, it can be assumed that credibility, as a feature relating to entities, objects or activities, may constitute the research plane of administration science and administration law. This is because the notion of credibility can be applied to the actions or properties of administrative bodies, entities and processes or phenomena occurring in public administration. First, credibility in administrative law can be seen in the context of the constitutional prerequisites conditioning the functioning of public administration in a way that inspires confidence in this sphere of public authority. Secondly, it is possible to speak of credibility in terms of the impact of the legislative process on the quality of administrative law. Credibility is also a desired feature in the course of administrative proceedings concluded by an administrative decision.

Constitutional determinants of a credible public administration

The role and constitutional position of public administration means that its credibility is equated with compliance with the law, the rule of law, timeliness and impartiality, correct assessment of the facts when issuing decisions, efficiency, cost-effectiveness and reliability, and a high level of training of civil servants. The administration should also carry out the tasks assigned to it and apply the law in a way that inspires confidence among citizens. This objective can be achieved in a democratic state governed by the rule of law by creating the conditions for the administration to perform its assigned functions legally and efficiently, as well as ensuring that the public interest and the individual interest are respected in the activities of public authorities. The standards for credible administration, so understood, are primarily set out in specific provisions of the basic law. The idea of a democratic state of law, implementing the principles of social justice, referred to in art. 2 of the Constitution of the Republic of Poland of 2nd April, 1997, clearly indicates the constitutional function of the state performing tasks for the benefit of citizens in accordance with the public and individual interests and with respect for the law established by democratically elected representatives of the people (Z. Witkowski, J. Glaster, B. Gronowska, A. Bień-Kacała, W. Szyszkowski, 2000, pp. 71-72). Article 30 of the *Constitution* imposes on public authorities the obligation to respect and protect human and civil rights (Mamiński, 2022, 30-36), and a limitation of the use of these constitutional rights, pursuant to Art. 31, may only take place in exceptional situations statutorily specified and to the extent necessary to ensure public safety or public order – without violating the essence of freedoms and rights (B. Banaszek, A. Preisner, 1996, p. 113, B. Gronowska, 2000, p. 132). Moreover, formulated in Art. 32 of the *Constitution*, the principle of equality of citizens before the law and the obligation to treat citizens equally in comparable cases by state authorities require, when issuing decisions by these authorities that produce legal or factual effects for recipients, the correct application of the applicable legal regulations by the authorities, reliable conduct of explanatory proceedings and detailed justification of decisions, especially those not in line with the expectations of their recipients

(J. Buczkowski, 1999, p. 43). The juxtaposition of these provisions with Art. 7 of the *Constitution* expressing the principle of the rule of law will therefore be a determinant of a credible administration. These provisions indicate the obligation to carry out the actions of the state's objectives on the basis and within the limits of the law, in a manner that inspires confidence in the public authorities, while preserving civil liberties and the servant role of the public administration towards the public (Z. Witkowski, 2000, p. 73).

It should be emphasized that the obligation of administration to act on the basis of law eliminates the freedom of actions of state bodies, and also standardizes the performance of tasks by adapting this activity to the requirements specified by the legislator. The types of these standards are referred to primarily in Art. 87 of the *Constitution*, and Art. 93, sections 1 and 2, divide them into norms applicable in external relations of public bodies and internal norms. The first group of standards constitutes the basis for issuing decisions towards entities outside the administration, and thus determines the credibility of the administration in external relations. The second group of standards, which includes acts of an internal nature, such as regulations, guidelines, instructions, determines credibility through formal and legal standardization within the public administration system, especially at the office level (K. Eckhardt, 1999, pp. 27-34).

Other constitutional determinants of administrative credibility are related to a number of obligations of public authority, such as ensuring openness and transparency of operations and organizing open access to public service. The constitutional rights of citizens affecting the credibility of the administration include the right to appeal against decisions of administrative bodies, submit petitions and applications, and the right to be paid compensation for damage caused by actions of public authorities (B. Gronowska,2000, pp. 129-131).

Public awareness of the actual actions of public administration is an important element in evaluating its credibility. Thus, the granting in the *Constitution* of the right to obtain information on the activities of public authority bodies, as well as persons performing public functions and carrying out public tasks and managing state property (Article 61) allows the public to monitor the level of efficiency and lawfulness of the implementation of administrative tasks and to limit the possibility of corrupt actions by entities of public authority

(Journal of Laws of 1997, no 78, item 483. The public in a democratic system should be aware of how, for what purpose and by whom decisions affecting social and individual interests are made. Citizens' access to public information, including processed information, makes it possible, in addition to assessing legality, to gain knowledge of the public administration's actions that may directly or indirectly affect the legal or financial situation of citizens in the future.

The credibility of the administration is determined on the one hand by the transparency of its operation and on the other hand by its protection against undue abuse. The *Constitution* sets the standard in this matter, stipulating in Article 51 that only to the extent necessary in a democratic state under the rule of law may public authorities obtain, collect and make available information on citizens. This standard reinforces citizens' trust in public authorities and thus affects the credibility of the administration, especially as it grants citizens the right to request the verification and deletion of data that is inaccurate, incomplete or collected unlawfully (Journal of Laws of 1997, no 78, item 483, M. Jackowski, 2004).

Citizens' trust in public authorities is also influenced by the possibility for citizens to actively participate in the planning and execution of public tasks, which is expressed in the *Constitution* by granting citizens the right to participate in referendums, especially local referendums (Article 170) and open access to the public service – article 60. (B. Banaszek, A. Preisner, 1996, p. 113, M.Kijowski, 1999, p.88). The possibility of directly influencing decisions affecting a community through participation in a local referendum is an important element of the external quality of the administration, as citizens can express and realise their needs and expectations of specific actions of the administration in this form. In turn, open access to civil servants underlines the requirement of impartiality of the executive in carrying out the tasks of the state and determines the need for clear and transparent rules for recruitment to the public service.

The credibility of the administration further depends on the legal and constitutional means of securing the rights granted to citizens. Authors B. Banaszek and A. Preisner distinguish two forms of protection of fundamental rights – repressive and preventive ((B. Banaszek, A. Preisner, 1996, p. 113).

The measures of this protection can be divided into procedural and institutional measures. The first group includes the right referred to in Article 63 of the *Constitution* to submit petitions, requests and complaints to the organs of public authority or organs performing tasks commissioned in the field of public administration, about actions contrary to the public or individual interest, and the right referred to in Article 78 of the *Constitution* to appeal against decisions issued in the first instance, as well as the right under Article 79 to submit a complaint to the Constitutional Tribunal regarding the compliance with the Constitution of a statute or any other normative act, on the basis of which the public administration body has made a decision (B. Wierzbowski, 1991, Z. Czeszejko-Sochacki, 1998). Thanks to these provisions, citizens have not only the possibility of signalling administrative actions that violate their interests, but also a real opportunity to change decisions that are contrary to the rule of law and incompatible with their expectations.

Such measures should also include the right of citizens to be compensated for damage caused by the unlawful actions of public authorities. Without referring to the actual possibilities of enforcing such compensation from public authorities, in addition to the right of citizens to seek redress for the damage caused to them, this right obliges civil servants, due to the financial implications, to handle citizens' cases fairly and to apply the applicable legal norms correctly (M. Babiak, 2002).

The group of institutional measures that shape the credibility of the administration includes institutions whose task is to protect citizens' rights and to ensure that the actions of public authorities do not raise doubts in terms of compliance with the law. This group should include the Constitutional Tribunal, the Ombudsman, the administrative judiciary and the Supreme Audit Office (A. Sylwestrzak, 2001, p. 7 ff.) It should be noted that the rulings of the Constitutional Tribunal regarding non-compliance with the *Constitution* or other normative act of final administrative decisions permit their amendment (pursuant to Article 190 sec. 4 these rulings constitute grounds for reopening the proceedings, revoking a decision or taking other resolution). The role of the Ombudsman is, in turn, to protect human rights and freedoms and to provide assistance to citizens in the event of violations of these rights by public authorities – article 80 of the *Constitution* (S. Geberhner, 1986, A.

Karnicka, 1987). Referred to in Art. 184 of the *Constitution* the powers of administrative courts consisting of judicial review of the legality of public administration activities, and resulting from Art. 203 of the *Constitution* powers of the Supreme Audit Office to control the legality, purposefulness, cost-effectiveness and reliability of the activities of the administration and bodies performing public tasks, determine the bodies of this administration to perform tasks for the benefit of citizens not only in accordance with the law, but also efficiently, economically and rationally (J.Jagielski, 1999, pp. 43-44).

Legislative conditions for the credibility of administrative law

Credibility can also be considered in the context of the impact of the legislative process on the quality of administrative law. As the lawmaking process is defined in the science of administration as the process of making state-legislative decisions concerning the selection of a pattern of conduct to become binding and the observance of which is guaranteed by state coercion, the issue of legislation in qualitative terms is related to the principles of lawmaking, including the planning and forecasting of lawmaking activity, the scope of the legislation to be made, and the mutual relationship between the legislative activity of the administration and the laws enacted by the legislature (H. Groszyk, A. Korybski, 1992, p. 58, S.Zawadzki, 1979, pp. 6-7).

The legality and efficiency of public administration and, thus, its credibility, is determined in particular by the quality of the regulations that formalize its system and organization. This mainly applies to designing public administration structures and the executive activities of public administration. The proper preparation of statutory and regulatory acts and the coordination of activities of various authorities in the preparation of an act constitutes a necessary element of obtaining the quality of constitutional provisions formalising the structure of the individual bodies and the links between them, as well as rules of procedure and administrative law. The quality of these provisions in turn affects the correct application of the law by public administration (M.Sitek, 2017, p.154).

The law-making process should be subordinated to the principles of law-making, which are directives binding on participants in legislative proceedings and forecasting these proceedings. J. Bafia includes these principles in the general group of legal principles (J.Bafia, 1980, p.82). Due to the fact that the principles of law-making take the form of legal norms or postulates formulated by science and practice, the obligation to comply with these principles should be defined broadly. The principles of law-making which are of particular importance for the formalization of administration include the principles of rational law-making (J.Łukasiewicz, 1990, pp.190-191).

In broad terms, the principles of rational law-making take into account the socio-political system and directives of legislative technique. In the literature on the subject, these principles are classified. According to H. Rot and J. Grzegorczyk, the following groups of general principles of law-making can be distinguished: systemic principles, axiological principles, principles of mutual relations of law-making acts and the principle of organization of law-making works (H. Rot, J. Grzegorczyk, 1984, pp. 150-155). The influence of the systemic principles on the formalization of the organization of administration, which include the principles of planning, the rule of law and direct democracy, is expressed by rationalizing the law-making process, designating, in accordance with the adopted systems of values, the directions of law-making, counteracting the over-formalisation of administrative organisation and the participation of the public in lawmaking (J.Łukasiewicz, 1990, p. 192). The content of these principles indicates that they can be used to achieve the quality of organizational solutions. Interference of the public in the formation of law-making processes is in turn conditioned by the state of the economy, social structures, organisational arrangements of the state, and the culture of a given society (H. Groszyk, A. Korybski, 1992, p. 58). The axiological principles defined by J. Wróblewski as the directives of the permanence of a normative act include the minimization of changes in the legal system. According to this principle, the legal provisions in the making should be flexible and permit, by leaving some "space", to reduce the formalization of the administration organization (J.Wróblewski, 1978, p. 13 ff). The above principle also corresponds to the principle of the mutual relationship of legislative acts, in particular, the principle of coercion of the act and

law-making competence, which determines the increase in the organizational flexibility of administration and rationalizes the law-making process ((H. Rot, J. Grzegorczyk, 1984, p 159, (J.Łukasiewicz, 1990, p. 193). The last group of the aforementioned principles suggests a systemic approach to law-making. The principle of organization of law-making works refers to legislative work as a cycle of organized action taking into account planning, the participation of social, environmental and professional actors in the law-making process.

The principles of law-making in a narrower sense include the directives of law-making techniques. In the science of administration, there are factors resulting from the principles of rational law-making, which affect the effectiveness of the application of law by the administration. Among these factors, Z. Leoński includes three legislative technique directives: the directive of the clarity of the legislation made, the actual impact of the legislation and the application of the system of measures for the implementation of the legislation (Z. Leoński, 1999, p. 42). These factors are complemented by axiological considerations, whose interference in lawmaking amounts to taking socially accepted values into account in the legislative process (Z. Kmieciak, 1994, p. 114).

The above reflections on the role of legislation in shaping public administration indicate that the formalisation of administration based on rational law-making is a factor that determines the credibility of the administration's actions. Furthermore, the scope of this regulation and the way in which the law is made determines this credibility through the corresponding quality of administrative law, which will be measured by a high degree of public acceptance of legal norms.

Credibility in the administrative decision-making process

The issuing of administrative decisions is among the basic forms of administrative action, constituting the "product" of administration and an instrument for the performance of its functions (T.Kuta, 1992, p. 12). Administrative decisions also enable the implementation of the administration's agenda (J. Łętowski, S. Strachowski, J. Szreniawski, W. Taras, A. Wróbel, 1993, p. 50).

Therefore, the public assesses the credibility of the public administration through the administrative decisions themselves and the proceedings following which they are issued. The correctness of decisions in individual cases and their legality depends both on the degree of compliance with substantive law and procedural law and on the organisation of the administration, in particular, the training of administrative staff, the distribution and workload, the flow of information, and technical equipment. The above position is confirmed, amongst others, by the views of W. Dawidowicz, according to whom legal norms have an overriding character in influencing the decision-making process, which may be compatible or not inconsistent with these norms. In contrast, this author disagrees with the view that factors such as political directives, ethical norms, and 'work style' assumptions determine decision-making on a par with legal norms (W. Dawidowicz, 1984, p. 83). Other representatives of the doctrine – E. Knosala, L. Zacharko, and A. Matan – emphasise, following J. Borkowski, that the main factor conditioning the process of administrative decision-making is the norms of general administrative procedure (J. Borkowski, 1970, pp. 139-141, E. Knosala, L. Zacharko, A. Matan, 2000, p. 39.). It can therefore be concluded that the credibility of the administration when issuing administrative decisions is primarily determined by legal factors, which can include compliance with the rules of administrative procedure, as well as other provisions governing administrative procedure (Z.Leoński, 1999, pp. 21-45).

The principles of administrative procedure, the requirement to comply with which has a direct impact on the credibility of the administration when issuing decisions, include the following principles: the rule of law and objective truth – Article 7 of the Act of 14 June 1960 *Code of Administrative Procedure* (Journal of Laws of 2021, item 735), resolving doubts to the advantage of the party (Article 7a), cooperating to the extent necessary to clarify accurately the factual and legal state of the case, taking into account the public interest and the legitimate interest of citizens and the efficiency of the proceedings (Article 7b), conducting cases in such a way as to inspire confidence of its participants in public authority (Article 8 sec. 1), not deviating from the established practice of settling cases (Article 8 sec. 2), openness of the proceedings (Article 9), active participation of the party (Article 10), simplicity and speed (Article 12), striving, as far as legally possible, for an amicable

settlement of disputed issues (Article 13), permitting the parties to assess the performance of the offices managed by these authorities, including the staff of these offices (Article 14a). The general principle of balancing the public interest rationale and the legitimate interests of the individual is essential to achieving credibility. This principle becomes particularly important in cases in which an administrative authority decides on the rights or obligations of a party by exercising the freedom of choice to decide on matters provided by administrative discretion (Judgment of the Supreme Administrative Court of 11 June 1981 SA 820/81, ONSA 1981 No. 1, item 57).

These provisions are not mere postulates, but have the same rank and character as other procedural provisions. This is clearly emphasised by the case law of the Supreme Administrative Court treating a breach of these principles as grounds for annulling the contested decisions (Judgment of the Supreme Administrative Court of 4 June 1982, I SA 258/82, ONSA 1982 No 1, item 54).

The content of these principles therefore clearly determines the credibility of the administration. For example, it follows from the principle of the rule of law that an administrative authority in administrative proceedings must not take actions or require the parties to perform obligations other than those stipulated by law. The principle of enhancing citizens' confidence in administrative authorities requires that proceedings be conducted in such a way as to inspire confidence in public authority on the part of those involved (J. Chmielewski, 2018, pp. 160-199). The principle of objective truth, on the other hand, requires authorities to thoroughly and comprehensively analyse the facts on the basis of which they issue their decisions. The right of a party to participate actively at all stages of the proceedings is another standard of quality of action, imposing an obligation on administrative authorities to enable a party to exercise this right, for example, by having the right to see and respond to the evidence gathered in a given case. This principle is closely linked to the principle of openness, since ensuring that the parties are informed about the legal and factual circumstances that may affect their rights and obligations, and notifying the parties of the possibility of harm arising from ignorance of the law, is an important determinant, the fulfilment of which confirms the attention of the administrative authorities to the proper handling of citizens' cases.

The principle of speed and simplicity of proceedings affects the credibility of the administration, because, on the one hand, it implies an obligation to comply with deadlines for dealing with citizens' cases, with a reliable establishment of the facts on the basis of transparent evidence procedures. On the other hand, it determines the limitation of the formalisation of the proceedings to the limits of its effectiveness.

The principles of documenting the course of the proceedings and permitting the parties to assess the performance of the offices managed by these authorities, including the staff of these offices, are particularly important for building the administration's credibility in the course of handling of cases. This is because it guarantees to the parties the certainty of the legal events taking place and makes it possible to inspect the actions taken in the course of the proceedings, in terms of legality and fairness (L. Żukowski, R. Sawuła, 2004, pp. 51-66).

The other provisions of the general administrative procedure affecting the credibility of the administration include the norms designed to ensure impartiality and objectivity in the issuance of decisions through obligatory or optional exclusion of the authority (Articles 24-27 of the Code of Administrative Procedure), provisions specifying the time limits for handling cases (Articles 35-36 of the Code of Administrative Procedure), the rights of the parties in the event of protraction or inaction of the administration (Article 37) and the liability of an employee of an administrative authority on this account (Article 38 of the Code of Administrative Procedure). Standards of a technical nature, e.g. service, or the requirement to keep written or electronic case records in the case file, also affect the credibility of the administration's actions in the course of administrative proceedings. The latter requirement in particular permits the parties to the proceedings to assess the credibility of the administration and to individualise responsibility for possible irregularities in the issuing of decisions. In fact, pursuant to Article 66a sec. 2 of the Code of Administrative Procedure, the contents of the case record indicate all persons who participated in taking actions in the administrative proceedings and specifies all actions taken by those persons, together with a relevant reference to the documents preserved in written or electronic form specifying those actions. Credibility is also determined by the provisions on the investigation procedure, including the rules on the proceedings to take evidence (chapter 5 of the Code of Administrative Procedure).

The legal requirements relating to the external form of the decision and its content are of particular importance for assessing the credibility of an administrative body in the decision-making process. Practically each of the obligatory elements of a decision listed in Article 107 of the Code of Administrative Procedure, such as the designation of the authority issuing the decision, the date of the decision, the designation of the party or parties, the citation of the legal basis, the decision, the factual and legal grounds of it, the instruction, the information on the right and procedure for lodging an appeal and the signature of the person authorised to issue the decision (name and surname, official position) constitutes a standard necessary to achieve credibility by respecting the interests of entities in their relations with administrative authorities.

An element that allows the parties to the proceedings to assess the credibility of the administration's actions is undoubtedly the grounds for a decision, especially one issued to the disadvantage of a party. The grounds for the decision should, in principle, leave the party in no doubt as to the factual and legal basis for the decision taken by the authority. Therefore, the Code of Administrative Procedure requires that the facts and evidence constituting the basis for the decision and the legal reasoning, citing specific provisions, be indicated in the grounds for the decision. In order to fulfil the postulate of credibility, the grounds for a decision should first and foremost allow a party to the proceedings to assess the legality and reliability of the actions of the administrative authorities in handling the case. Achieving credibility in this area is particularly important, because the content of the grounds for a decision usually influences a party's recourse to legal remedies against the decision (L. Żukowski, R. Sawuła, 2004, pp. 156-160, judgment of the Supreme Administrative Court of 10 July 1985 SA/Kr 579/85, ONSA 1985 No 2, item 14, judgment of the Supreme Administrative Court of 30 June 1983 I SA 178/83, ONSA 1983 No 1, item 51)

Summary

Summarising the consideration of credibility in administrative law, it can be said that the issue is multifaceted and relates to the norms of administrative constitutional law, substantive law and procedural law. The limited framework of this paper has only made it possible to signal the topic of the legal aspects of public administration credibility. Undoubtedly, the factors determining the credibility of administrative law can include the constitutional norms of the Constitution of the Republic of Poland, the observance of the principles of 'good' administrative legislation and the application of the rules of general administrative procedure in a way that inspires citizens' trust in public authorities. However, the issue of credibility in administrative law goes well beyond the above-mentioned issues. This is because credibility can be considered in the context of constitutional rules governing the organisation of the administration at system or office level, legal and non-legal norms ensuring the accountability of the administration, e.g. introducing criteria and yardsticks for assessing the efficiency of the administration (Supernat, Z. Duniewska, M. Stahl, M., 2013, pp. 35-41.) An analysis of the scope of the notion of credibility itself is also warranted. This is because provisions of administrative law require, in some cases, that the entity seeking authorisation to carry out regulated activities must possess the characteristic of credibility (e.g. organisational, financial, and technical).

In the author's opinion, therefore, an in-depth study of credibility in administrative law is warranted.

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