Name of the recording: How to control administrative decisions effectively - attorney Krzysztof Wąsowski PhD
Duration of the recording: 0:37:39

(ns) - inaudible fragment
italics - uncertain spelling of a word, phonetic notation
... - an interrupted thought, an interrupted statement
☺ – laugh

As they say, ladies and gentlemen, it is impossible to live today without Facebook. So, indeed. In order to apply these rules and to understand which decision is good and which is bad, one of two features is necessary. Men do not have any of them. Sometimes women have both, and sometimes they have at least one. Or you need to have intuition. As it is well-known, men have no intuition. Or you need to have life experience. I must reveal this secret to ladies that a man never lives to the age when he can be said to be experienced in life. Like a child. He is always like a child. Some kind of gadget, something just in hand. And we, regardless of the number of years, will never gain this experience. Why are these two features so important? Because when we observe the activities of public administration and, in particular, the administrative decisions as to whether they are correct or incorrect, then everyone will be more or less illegal. Every decision will be flawed. And this will be a formal error. Not to mention the factual errors. However, each decision will definitely contain a formal error. I will show you exemplary decisions at the next meeting and we will have this fun to find the mistakes. What is the essence of the problem in analysing administrative decisions? The problem is to distinguish between a material and an insignificant error. Material, it means, the one that affects the outcome. In other words, if the error did not occur, the solution should be different or could be different. An insignificant error is the one that does not affect the outcome. Finally, the third category. A gross error. This is such an error... this is such a material error, also called a camel, that the significance of this error actually makes such a decision invalid. And the consequences associated with the invalidity of such a decision. In order to distinguish between a material and an insignificant error, one must have either intuition or life experience. So, as you can see, gentlemen, we are out of the line. We can relax here. The ladies play the game, simply. I have three women at home. The eldest... my wife; I can't say how old she is. But the youngest is 9 years old. The middle one is 20. There are two of us, boys. Me and my son. And even this youngest 9-year-old daughter has much more intuition and life experience than I already have. Which simply surprises me. So that it allows you to fool around... all a man can do is to distance himself from this situation. Of course, there are also extreme ways of defining oneself as a woman. But that does not help too much. The defining itself might not help much. Since it will neither give us intuition nor this life experience. But we see that there are some people who try. What consequences, we still have to wait. Good. Now, when evaluating these decisions ... that is to say, we have three types of errors. A material error, an insignificant error and a gross error. The whole skill of evaluating an administrative decision is not to find any error in that decision, since there are really many of them. But the skill will be to find a material error and to distinguish it from an insignificant one. In general, the case is that young lawyers who complete their legal studies and are, let’s say, still fascinated by the code of administrative procedure ... there are such people. I myself was one of those. They are incredibly happy to have an administrative decision in their hands, since they see a lot of errors there. The only problem is that they can mainly see insignificant errors there. Since they are the easiest to see. For example,

lack of date in the administrative decision. Is a decision without a date, without an administrative date, a decision bearing a material or an insignificant error? Of course, insignificant. Why? Because the date of an administrative decision does not indicate its effectiveness. Probably in accordance with Article 110 of the Code of Administrative Procedure, the decision takes effect not on the date of its adoption, but on the date of its service. Thus, a much more significant date than the date of the administrative decision and that which has any effect is the date of service. I once dealt with such proceedings with another act or administrative activity that was not a decision. I had a Ms bailiff, who was very... I think is still a very honest bailiff. And she honestly auctioned off the property to the debtor. It was possible to catch the debtor. Mark his real estate. And hold an auction. The auction was successful. She received money that she had a duty to return to the creditor, right. And it was created in her head and not just in her head. But the fundamental question has arisen in general. Should I pay VAT on this? 22% if I remember correctly. Or maybe not? It was quite a significant amount in the case of several hundred thousand zlotys for this property. I do not even know if this property did not cost several million zlotys. Quite a serious amount of money. And she did not know. And that is the principal issue. Does she have to deduct VAT from this amount, which it gives to the creditor or not? She approached the problem methodologically. She analysed the rules. She read, analysed. She asked tax advisers. And everyone told her that there is no VAT due on this amount. That this activity of auctioning real estate by way of bailiff's enforcement is not subject to this tax. But she was still very cautious. She stated that since in the tax ordinance... The tax ordinance is such a KPA (Code of Administrative Procedure) for Tax Offices and Tax Control Offices too. This administrative procedure is also codified. Perhaps if there is a moment in our project, we would also deal with it. There are quite significant differences comparing to KPA. A tax decision is only apparently very similar to an administrative decision. And she stated that there are articles 14A and subsequent articles in the Tax Ordinance which refer to the interpretation... the Minister of Finance's binding interpretation. So she stated as follows. Well. I know that I... I already know that I do not have to pay this tax. So I can return that amount as if I had not deducted VAT. And I will give the rest to the debtor. Plus my commission. That is more or less what sharing the costs means... of the money obtained from this bailiff's enforcement proceedings. And she wrote... and the procedure provided so and it still does. That such a potential taxpayer, in this case a bailiff, should write an application to the Minister of Finance. This is precisely through the Tax Chamber, probably in Łódź. Now it is called the National Revenue Administration. It was necessary to write such a proposal, to ask a question. The question was very simple. Is the bailiff's auction of properties subject to VAT or not? She asked this question. And the procedure stated that this question still needs to be answered by yourself. It means, offer your answer to the authority. And she proposed it. It is not. And the authority then had 3 months to issue or not to issue ... to confirm or not to confirm this reply. If these three months had passed since the application was submitted, then the legislator established the so-called legal fiction, a presumption of the Minister of Finance's approval. Where was the problem? The point was that this confirmation or refusal to confirm this legal question to the Minister of Finance did not take the form of an administrative decision. Such a tax interpretation of the Minister of Finance was a different act than the administrative decision, read, also a tax decision. This is essential. So neither the rules of the KPA nor the tax ordinance were in force for that act. Precisely, the rules of the tax ordinance. What was the real status? I can't really remember detailed dates any more. But for the sake of simplicity, I will give such simple dates. The bailiff submitted the application to the Ministry of Finance on 1

February, according to this procedure. And she waited bravely. She counted. 1 March passed. One month. 1 April passed. Second month. 1 May passed. Third month. She waited until 1 September. She received nothing. She waited six months, am I counting well? Many, many months. She waited three months longer than... so she stated that this correspondence could not take that long. No exaggeration. So she considered, in accordance with these rules, that she had obtained the approval of the Ministry of Finance for her answer. Of course, she spent that money without reducing it... without paying that VAT. But on 1 October, a letter from the Ministry of Finance dated 20 April arrived. That is, at that point in time. Of course, contrary to her interpretation. Claiming that yes. That is... according to the Minister of Finance, the auction is taxable. And then she came to me, and we started thinking. And an obvious scam. There was still something there: when we looked at the mail, the letter was sent from the post office by the Ministry of Finance at that end of September, that's true. However, the term ran from 30 April. So you could see with the naked eye that it had to be backdated. That this date must probably have been placed somewhere in September, when they realised that they had forgotten. They entered the date and only then sent it. We went courageously to the administrative court. At the time, there was probably only a single-instance supreme administrative court. And the administrative court did not take our complaint into account. It said they were sorry. You have to be lucky in life. But how come? We received the letter four months later already after the deadline. So, what's the problem? But the date of issuance of this act... but wait a minute. But the date of service of an administrative decision does not count, only the date... I mean, the date of service counts. And that was a long, long time after. And then the court sent us a clever answer. But that is not a decision. There are no such guarantee rules. That is to say, where there is an administrative act, the authority can use the trick and be delayed, even though there is a presumption of a settlement. Backdating something. And if we do not catch it by the hand, if we do not carry out criminal proceedings that there was simply a forgery of a document, a certification of untruth in an authentic document, right We did not have that possibility. I could only advise the bailiff to go to the public prosecutor's office and simply report on the likelihood of a crime committed by an official. And the prosecutor said "which official entered that date"? Unknown, right. So this is important. If it had been a decision, she would have won, wouldn't she? Since the KPA clearly states that. For KPA, the date of the decision is not a significant element of that decision. It is not so important that this absence could lead to the decision being revoked. But for an administrative act which is not a decision, for example, the tax interpretation of the Minister for Finance, it turns out that this is a very important element. Since what date would you enter... can you imagine that I have submitted, for example... could I submit a request for an interpretation to the Minister of Finance and it would take 10 years? Maybe 10, I exaggerate. Three years, right. And with interest, they would then still hold us to account for the fact that we did not pay any tax using this presumption. Clearly, there is a systemic error here. So that... so that you can see... very clearly to distinguish between types of errors. In order to distinguish these errors, one must have either intuition... feel which error is material and which is not. Or some experience. You are already gaining some experience with training like this. It is worthwhile to analyse later what Professor Cieślak said between the lines. Because he spoke, as if not really about the subject. But then it really turns out that it is quite inspiring. What are the main principles of decision making? In fact, all control of decision making will be based on principles. The principles are most important according to the KPA. These are Articles 6 to 16 in the Code of Administrative Procedure. There are a little more than 10, although we have 10 articles. But Articles 7A, 7B have been added. And I just want to draw

your attention to some quite important issues. The first basic principle is that of legalism. It originates from the constitution. Article 7 of the Constitution so stipulates. Public authorities act on the basis and within the limits of the law. In other words, every public administration body must have a legal basis for any activity. The famous anecdote is that if you come into office and say good morning and the official answers you "what", then you should ask yourself on what legal basis he answered you. That's true. Since by reducing the matter a little bit to absurdity, an official must always act under the law. A citizen can do anything, in accordance with our constitution in force, that is not prohibited or prescribed by law. You may but do not have to say good morning. Since you be brought up well or not really well. Whereas the official must have a legal basis. The question to the official on what legal basis you are answering good morning will cause confusion. Many officials may not know, for example. And what will happen then? For example, it is a bit like that one day... once. Some time ago, I made a mockery of a plush tiger for the first child my wife gave me. Upon delivering the second child, she was already thinner more clever and had the house bought. So to buy a house, I had to go for a loan. I went to the bank. This is not exactly an official. But the lady at the bank absolutely had this clerical profile. And once in the banks, to get my account statement for the last six months, how much money I earned in the last six months, the lady used to tell me that I would have to wait three months. That is inconceivable today. Because today, everyone will check their statement from any banking period in their computer. Then the lady used to say that I had to wait three months because it is such a complicated operation for them to count how much money I had in this account over the last six months, what were the cash flows. Because I needed it for the loan. I said to the lady, all right. That is an excellent answer. Then write it down for me. Then she asked what for? It is because my wife will not believe me that such a stupidly easy act as a bank statement will make me wait six months. She is in a hurry, she is pregnant. She is slightly motivated, so to speak, to live in the house as soon as possible rather than later. And she is waiting for this house to be decorated. Well, we need a loan for that too. The lady said: but I will not write it for you. So I pulled out my mobile phone, because they were already available and I said: "so, tell me this, only I will record it". The lady did something like that. So I said, "does it mean it yes or no?" I cannot read from such body language at all. And it turned out that she ran for the manager. The manager came and said. Sir, I do not wish that you record me and this lady. I said "but I am not recording this lady or you". "What are you doing then?" "I am recording myself in conversation with this lady and with you because I wish it were recorded. Because I have to present this to my wife. So that she has proof. After all, she will not believe me that you have such procedures in this bank and so on." Again, the whole thing was based on the issue under what legal basis I was recording this? I said "and on what legal basis you do not want me to record my conversation with you?" So these are also the issues that will always take place in the authority. Authorities or officials always must have a legal basis. On what legal basis he should answer good morning? Under Article 8 of the Code of Administrative Procedure, i.e. the principle of increasing citizens' confidence in the state bodies. One of the broadest principles. That is what I will continue to discuss. Article 6 states almost like the Constitution. Article 6 of the KPA. Public administration authorities act on the basis of legal provisions. That is precisely the principle of legalism. If an administrative body wants to do anything, they must have a legal regulation. The Constitutional Tribunal states in its jurisprudence that these provisions must be of a statutory nature. They must not be at a lower level. Unless they are at a level of a regulation that complements the law. So they are linked with the act of law. What we said before the break about these COVID regulations, these yellow

or other red zones. There is a fairly serious constitutional problem here. But yes, indeed, formally, if there is a statutory status, then yes. There could be an international agreement that has the same rank as the act of law. It can be a Union directive, which is directly implemented, or a Union regulation, which is in principle directly applicable. So this cannot, for example, be a legal basis in the regulations of the office. In some internal law. In instructions to the official. Officials very often use instructions and guidelines. What Professor Cieślak said about administrative policies is true. You have to be as sharp as Pitbull and not allow any tree to be cut down. Why? Since we are an ecological municipality and we will never allow it. But here, the roots have grown under the foundations of the house and pose threat to the safety of the buildings. Never mind. The tree is most important. Can one get such a guideline? Yes, it can. Can it be invoked externally to the citizen? It cannot. This is, so to speak, a lower-rank act and here it directly violates Article 6 of the KPA. Any such reference to independent internal instructions, rules of procedure, status ... the statute of the office or just any such guidelines ... or even administrative policy. Some policies are adopted in the form of a document, precisely in environmental protection. A great deal... when you look at environmental law, you have a whole bunch of regulations that allow authorities to set policy in energy law. There are Polish energy strategies. They are so-called *soft law*, i.e., soft law which will not provide a basis for a given authority to act in a sovereign form, namely, to issue administrative decisions. The code is clear. Public authorities are bound to act on the basis and within the limits of the provisions of law. Another important principle is the so-called inquisitorial principle. As Professor Cieślak would say, this is Article 7 of the KPA. There is the famous Cieślak's triad. This is how we called it. Cieślak was once asked by his students: Professor, and what are the relevant provisions? He told me that. He says, my colleague, if you ever provide any training for a project on administration under control, God forbid under the Justice Fund grant, it is simply a disaster because you know very little about it. But when you get to know it, at least say that the KPA is contained in three provisions. I ask myself, in which ones? He says, in Article 7, in Article 77 and in Article 107. We call it Cieślak's triad, Cieślak's lucky sevenths. 7, 77(1) and 107(3) precisely. We ask why, Professor, is this Cieślak's triad? Why can the entire KPA be reduced to three regulations? To 7, 77 and 107? He says, very simply. Since, if you look at the analysis of the case-law of administrative courts, where an administrative court repeals a decision ... not where it dismisses a complaint and does not take such a complaint into account, so to speak. Only where it repeals a decision does it invoke this principle arising from Articles 7, 77 and 107 in over 90% of cases. That is the inquisitorial principle. This is the essence of the KPA. What is the difference between the administrative and the judicial procedure? That an administrative authority is both a court and a party. It is as if it was ruling on its own case. The court is always an arbitrator. The second thing is that it makes the authority simultaneously the arbitrator, the court in inverted commas and the party in the same proceedings. It is as if it was ruling on its own case by issuing an administrative decision. Well, as a result the authority will be always burdened with the burden of proof. Please note that if you read the KPA, controlling the administration ... it is worth having it. It is worth having that KPA with you somewhere. It is one of shorter codes and it is quite simply written. So this is not a unique legal creation. I really encourage to read it sometimes. I tried to read it to my children. My daughters usually fell asleep after the first, second article. My son survived until the 14th. What did this mean? What was my explanation for this situation? That my daughters understood what was going on quite quickly and they were bored. And my son didn't understand, right. He simply listened to the sounds as such. But, indeed, it is worth looking at the KPA and it is worth reading it. There

is no burden of proof. There is no distribution of the burden of proof. In any code of criminal procedure, civil procedure, in any code of administrative court procedure, in any act of law on administrative court procedure, you will have the burden of proof distributed. It means, the one who attacks is in command. If you want to win something, you attack someone, you accuse someone, you bring an action, you file a complaint with an administrative court, you have to provide evidence. You are the one presenting the evidence. The one who defends himself responds to your evidence. A simple rule. And the court does not take any evidence on an ex officio basis. In general. As simple as that. The court does not provide evidence. The court does not prove anything. The court only listens to the evidence of one party and the other party. And in the authority, in the KPA, the burden of proof is always on the authority. Even when a party submits an application, it is a classic error of the authority and it is very often an important error ... but the party has not proved it to me. The party is not supposed to prove anything. It is the authority that is to prove. It is the authority that has this duty of command. For it is the authority that is responsible for the so-called objective truth. Please listen. Article 7. It starts out this way almost like Article 6. It means that public administration authorities uphold the rule of law during the proceedings. That's it. Not only do they have a duty to act in accordance with the law, but they are also supposed to make sure that citizens comply with the law. So they uphold the rule of law. And, further on. They shall, on an ex officio basis or at the request of the parties, take all necessary steps to clarify the facts of the case in detail and to settle it. Ex officio. The court never proceeds ex officio, it does not take any measures of inquiry. Only an administrative authority has such a provision that it should proceed ex officio. Of course, maybe also at the request of a party. But, above all, on an ex officio basis, it is up to the authority to take all necessary steps to clarify the facts. If you had the KPA in front of you, and I will make sure you have it next time, and if you looked at Article 77(1), it is exactly repeated in the evidence proceedings. That it is the responsibility of the authority to gather all the evidence. And in 107(3), there is a continuation, because it refers to the factual justification. And in the explanatory memorandum, the authority has to explain what evidence it has gathered, which it considered credible and which it has denied. That is the responsibility of the authority, not the parties, isn’t it? So the first thing about such control of the activities of the administration in the form of issuing an administrative decision is, first and foremost, whether the authority fulfilled its obligation to gather evidence. So ... did the authority know and realise that the rule of gathering evidence was imposed on it? And that the authority is to collect evidence, rather than the party. The authority may, of course, ask for some documents, whether to testify or (ns) an opinion. But that is the responsibility of the authority. That the authority should take care of it. If the authority has not asked the party, the party does not have to provide any evidence to the authority. The party says, I want to.. Wąsowski can say, I want a driving licence. That's it. And the authority will say OK. Then, we have to check whether you have undergone a medical examination, whether you have passed the relevant courses, whether you have passed the relevant exam, whether this type of ... we have to check it. Because that is our duty. Not yours, right. Very often the authority says, then prove to me that we can give you this licence or something. But I do not have to. What do you mean, you don't have to? Because it is written in the KPA that it is you who are to prove it to me, rather than I should prove it to you. Of course, praxeologically, in the practice of life, it is very often the case that it is important for the party that a decision is made, so it reports this evidence to it and proves it to it. But that is not the essence of the process. Finally, the last element of Article 7. Not only is the authority supposed to uphold the rule of law, not only is it supposed to collect all the evidence and facts necessary

to deal with the case itself, but it is also supposed to do so with the public interest and the legitimate interest of citizens in mind. It is here, in a question to Professor Cieślak, that the concept of the social interest, also known as the public interest, appeared in these general clauses. What does the case-law say about the legitimate interests of citizens? The case law of administrative courts on the legitimate interests of citizens states a very simple thing. What a citizen wants must be considered to be in their rightful interest. Even when a citizen is stupid and wants something against himself ... sometimes this may happen. It is recognised that a citizen's demand, a party's demand, must be presumed to be in their rightful interest. Therefore, the authority does not really examine this. Whether this is a legitimate interest of the citizens or not. In practice, the authority will only examine the first part of that premise. Social interest. Since the authority must decide. First of all, it must act in accordance with the law. And that is one aspect. But, secondly, it must act in compliance with the public interest. Since it may be the lawful act of the authority, but contrary to the public interest. For example, probably in 1997, the Arms and Ammunition Act. Professor Cieślak had already spoken about this administrative recognition. A guy came to the regional police commander in Mazovia, in Warsaw exactly. At that time, the provincial commander issued such a decision. He says so. I want to have a permit for a sporting gun. For a sporting pistol. Because I like it. Because I want to feel safe. The regional commander states in accordance with the Arms and Ammunition Act, then you have to pass a special training, a course, the community intelligence, psychological and psychiatric tests and the test on the ability to use these weapons. The applicant has gone through everything. His neighbours like him. His wife is generally positive. The whole environment. They regard him as a balanced guy. He has met all these requirements. He received the administrative decision, the weapons licence. Everything would be fine however, perhaps a week or two weeks later, the same man submitted five new applications or several new applications for a new weapons licences. Here, too, the regional commandant said that he had made a mistake. That the guy is not balanced, however. It is not enough for him to have one, but he wants a whole arsenal. Probably on Monday he likes to shoot with a gun, and on Tuesday he likes to shoot with a pistol or he wants to shoot in the knee with one gun and in the head with another. It is difficult to sense why. What motivated him. Nevertheless, for these new applications for weapons licences he has met all the conditions. Nothing has changed. Psychiatric tests the same, community intelligence the same. Skills are the same. Nothing has deteriorated for such a short time. The commander obviously refused to give him the licence. But how did he justify it? There, the word 'may' was so very important for the administration and for the decision making process, the very word 'may'. There is a word in many regulations which says that... in this regulation on these weapons and ammunition it was also included. That the commander may refuse... I'm sorry. He can grant a weapons licence if this guy meets all the conditions. Well, the commander said: I can, it means that I do not have to. You seem to have fulfilled all the conditions, but I refuse you, because maybe that does not mean that I have to. And the commander lost in the administrative court. The guy appealed to the administrative court and the administrative court said: you are wrong, commander. In the administrative law, maybe, I mean, I have to, unless I cannot. And I cannot in two cases. Because it would be against the law. In the case of this gentleman, it would not be against the law since he had met all the legal requirements. And the second category? Even if something is illegal, it would be contrary to the social interest. So the commander could refuse, even in an unchanged factual and legal situation, to this gentleman, if he considered that such conclusions would already ... or that it would be against the public interest to issue these new decisions on these consecutive

pieces of weapons. And an important question arose, about which Professor Cieślak even wrote many times, but not only him. And what is this social interest? Where should we look for it? Since, according to the principle of legalism, what we have in the administration... we should look for it in the law. The official is bound by law. And we feel that the law is not the same as the social interest, it is true. And the answer is that the purpose of this legislation is the public interest. It can be said that the most legitimate justification for the regulations contains precisely this substance which can be described as the public interest. In the books of law theorists you can read ... two such law theorists wrote about the public interest. One wrote about the social interest in the administrative law in 1986, probably. Also a judge of the Constitutional Tribunal. The retired professor Mirosław Wyrzykowski, from Warsaw, had already written his habilitation. And in 2002 or 2001, I cannot remember, a little-known PhD from the Jagiellonian University, a doctor of legal sciences... a very good book. We regret that he did not develop further, did not pass the habilitation and did not continue the scientific career. His name is Andrzej Duda. The current President of the Republic of Poland. He devoted his doctoral thesis at the Jagiellonian University to the public interest. It means, social interest since the name has simply changed. Both Professor Wyrzykowski and Dr Andrzej Duda were unable to answer the question what the social interest really is. They both just said one thing. That the feature of the social interest or public interest is to change over time. Indeed, we can observe it. It is in the public interest today, for example, that death penalty cannot be used. The death penalty is not in the social interest. But before that, it was absolutely in the social interest. In a while, you do not know, do you? Today, in the social interest... the famous questions about abortion. Abortion in three cases in the social interest and in other cases it is not in the social interest. Why? This is what the legislator decided. In other words, this public or social interest must be sought... which authority must assess, in the explanatory memorandum to the laws. If you go to such an excellent website, www.sejm.gov.pl, you will find a tab called “the work of the Sejm” there. And there you have the transcripts of the work of the parliamentary committees, when they... they, i.e., the Sejm... Members of Parliament and experts determine the content of the rules. In other words, they say why a certain provision is introduced. Coming back to our example with the guy dealing with weapons and ammunition. If the commander looked into the law... there is a law on weapons and ammunition from the early 1990s. And if he looked at the explanatory referendum to this law, he could find out whether it is in the public interest to have broad access to weapons, unlimited or strict regulation of access to weapons. Of course, there is strict regulation. Today, we have a whole series of movements in favour of access to weapons ... greater access to weapons, which try to change precisely this social interest, change this regulation. But so far, they have not succeeded. Then this commander could have... as the court explained it to him, referred to it. That, because the legislator decided to write this law on weapons and ammunition in such a way that it is to be strictly regulated, it is against the public interest to grant such a person more than one weapon, or two or three. Since that would be contrary to the axiology of this law, to the purpose of the act of law itself, that is, to the public interest that is hidden there. In other words, the official cannot say that I decide so because it seems to me so. Because I am the supporter of weapons, I would grant it. And I am the opponent to the access to weapons, I would not grant it. Only the official has to say what the legislator was thinking at the time, if you have the rule in force. It is therefore worth checking it out. It is therefore worth looking for it.

END

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