

EU Rule of Law Report Consultancy - Sweden

Joint submission by the Swedish Section of the International Commission of Jurists and by Civil Rights Defenders

The Swedish Section of the International Commission of Jurists (ICJ-S) is a non-profit and non-partisan organization consisting of lawyers that works for human rights and rule of law in Sweden and internationally. ICJ-S was created after the establishment of the Geneva-based International Commission of Jurists in 1952.

Civil Rights Defenders is an international human rights organisation based in Stockholm, Sweden, that defends people's civil and political rights. It was founded as the Swedish Helsinki Committee for Human Rights in 1982 with the purpose of monitoring compliance with the human rights provisions of the Helsinki Final Act.

This joint submission by ICJ-S and Civil Rights Defenders regarding the European Commission Rule of Law consultation is mainly based on the [Program for Rule of Law Sweden 2019](#) that was created in an open process co-ordinated by ICJ-S. The program has been endorsed by Civil Rights Defenders, twelve other civil society organisations and 814 individuals.

Have you found evidence of any laws, measures or practices that impair judicial independence in your country? Would you have any positive developments to highlight in this respect? Please contribute to any of the following aspects as relevant.

The guarantee that Sweden's government is still democratic in the future is that there is both popular support and strong protection against temporary undemocratic opinions. There are reasons why the constitutions cannot be easily changed.

Sweden is not immune to the authoritarian forces of the kind that have taken power in Hungary and Poland, among others. It violates the rule of law by politicizing the judiciary and restricting public discourse.

The rules in the constitution on democracy, human rights and the judiciary's independence today have a very weak protection. A simple majority (51%) in the Swedish Parliament can today, through two decisions with an intermediate extra election of only 14 months, repeal our rules on democracy and human rights. Other important laws, such as the Election Act which are the basis for our free elections, can be changed by a simple majority single decision.

There are needs to introduce requirements for qualified majorities and coram rules when deciding on changes in the constitution and that intermediate elections should be only ordinary elections.

⇒ Appointment and selection of judges, prosecutors and court presidents

Judges are appointed by the government following a proposal from a judging panel or in the government's own opinion. The purpose of the panel is to minimize political influence in government appointments. However, the panel is regulated by ordinary law that can be changed by 51% of the parliament and the government appoints its members.

A real protection against political influence presupposes that the independence and representative composition of the panel is regulated and protected in the constitution and that the appointment of judges by the government only takes place on the proposal of the panel and only merits shall form the basis for assessing suitability. A representative composition of the panel includes that the Riksdag, the bar association, the judiciary, the highest courts are represented in and constitute the majority of the committee.

⇒ Irremovability of judges; including transfers, dismissal and retirement regime of judges, court presidents and prosecutors

A further aspect of the protection of the independence of the Swedish supreme courts is the regulation of the number of members. The current regulation means that in ordinary law a minimum number of members is laid down in each court. In the Supreme Court and the

Supreme Administrative Court "there shall be fourteen councils of justice or the higher number required". It should be considered to introduce rules in the constitution on a minimum and maximum number of members. One way for an authoritarian regime to gain control over the administration of justice may be to appoint an additional number of loyal judges in the highest instances who can form a majority.

In order to protect courts from a political influence through changes in the retirement age, the retirement age should also be enshrined in the Constitution.

⇒ Independence (including composition and nomination of its members), and powers of the body tasked with safeguarding the independence of the judiciary (e.g. Council for the Judiciary)

An important part of the courts' independence is, of course, how the National Board of Justice's governance and activities are designed. The head of Swedish National Courts Administration is today a government appointee. The Administration ought to be governed by a board in which the majority are judges. The board should also be given the mandate to appoint the head of the authority, which will improve its independence.

QUALITY OF JUSTICE

Have you found evidence of any laws, measures or practices that affect the quality of justice in your country? Would you have any positive developments to highlight in this respect? Please contribute to any of the following aspects as relevant.

⇒ Accessibility of courts (e.g. court fees, legal aid, language)

Most people in today's Sweden do not have access to justice in civil and administrative cases. It costs far too much financially to stand up for one's basic human rights when violated. The rights cannot be put into practice, despite the fact that the European Convention, which is Swedish law, contains a right to a fair trial regarding suspected violations of civil rights.

When a ban related to lack of accessibility for people with a disability was introduced in the Discrimination Act in 2015, this was seen as a success. Despite the fact that the Discrimination Act presents important principles, there are obvious shortcomings in the implementation of the law. Starting a discrimination court case on your own is not possible for people with a disability. Few have such personal finances that they can hire a lawyer or bear any legal costs in the event of a loss.

Most people do not have access to general legal aid and thus no opportunity to protect rights in the event of a violation before national authorities and courts in order to obtain redress or compensation.

The Swedish legal costs rules are based on financially equal parties, while disputes about freedoms and rights are often conducted between individuals and the state or other parties with completely different financial conditions than the individual. This situation does not

develop balance. Effective rights are not there due to the lack of guarantees for an individual to receive a representative or assistant supported by the state.

The low remuneration paid to legal representatives within the legal aid tariff framework means that it is also difficult to get really good lawyers who want to take on these goals.

Cases in Administrative courts are often complicated, and the authorities that are parties to the cases have a significant advantage with resources and employed lawyers. Individuals have no rights to legal representatives due to no rights to receive legal aid and do not have their legal costs covered even if they win their cases. The Rules of Procedure and Article 6 of the European Convention assume that the parties shall be equal. The situation that exists today in the administrative courts clearly does not fulfill that principle.

This may mean that Sweden in civil cases violates the rules of the European Convention on the right to a fair trial under Article 6 and the right to an effective remedy under Article 13.

Have you found evidence of any laws, measures or practices that impair the fairness and efficiency of the justice system in your country? Would you have any positive developments to highlight in this respect? Please contribute to any of the following aspects as relevant.

⇒ Respect for fair trial standards including in the context of pre-trial detention.

The Council of Europe and the UN have criticized Sweden for long detention periods. This is especially true in cases where the suspect has been subject to restrictions and thereby isolated from the outside world, which can be stressful both mentally and physically.

There is a need for detention times to be limited by time limits. A suspect must be able to be detained for a maximum of six months before the prosecution is brought. Exceptions can only be made if there are special reasons decided by the court. If the detainee is under 18 years of age, the time limit should instead be three months and exceptions shall be permitted only if it is absolutely necessary. The courts' restriction review must be more extensive. The courts must not only decide whether the prosecutor should be granted permission to issue restrictions, but also what kind of restrictions the permit covers in that case. Each detainee shall be entitled to at least two hours' stay with another each day, or at least four hours if the detainee is under 18 years of age. Detainees under the age of 18 shall not be kept in custody but in a special youth home.

⇒ Rules on withdrawal and recusal of judges and their application in practice.

⇒ Quality and accessibility of court decisions.

⇒ Corruption of the judiciary.

Swedish judicial system has not established a way to assess whether a person is unable to understand and to effectively participate in criminal proceedings due to their mental or physical condition or disabilities. Such a finding would prevent the person from being able to

waive the right to a lawyer, and also ensure that they receive necessary reasonable accommodation related to the criminal procedure, something which is essential to be guaranteed the right to a fair trial.

1. Following its visit to Sweden in 2015, the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) stated in its report to the Swedish government that “The procedure for screening newly arrived persons at police detention facilities continue to leave much to be desired.” No further actions have been taken to establish methods to identify if a person needs special support.¹

2. The report *Judiciary Treatment of Children with Neuropsychiatric Disabilities*,² from the Law Faculty of Stockholm University, takes a "holistic approach" to all stages of the process, from pre-trial to judgment, and noted that the number of prosecutions was significantly lower in respect of cases where the victim had a neuropsychiatric disability. This remained true even when the suspect confessed, and even when there were witnesses and clear evidence of the crime. The study looked at the reasons for the low rate of prosecution and found that the notifications of crime when the victim had a neuropsychiatric disability, in general, was treated differently than other notifications. For example, the study concluded that children with neuropsychiatric disabilities were not heard to the same extent as other children. Additionally, information about the child’s disability was usually included in the investigation after the child had already been heard, instead of before or during the hearing of the child.

The Convention on the rights of persons with disabilities has not been incorporated into Swedish law. Instead national laws should be interpreted in conformity with the Convention. However, a report from 2018, from the Uppsala University shows that in practice, the method to use convention conform interpretation is limited to the European Convention on Human Rights.³

3. Authorities’ and courts’ ignorance of their obligations to interpret national legislation as well as the European Convention on Human Rights, in the light of the CRPD and other binding human rights instruments, are significant reasons for why individuals with disabilities do not enjoy the rights protection they are entitled to (see the submission from the Swedish Disability Federation).⁴

¹ Committee for the Prevention of Torture (CPT), *Report to the Swedish Government on the visit to Sweden carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment from 18 to 28 May 2015*, page 5.

² <https://www.su.se/profiles/nala0714-1.185350>.

³ Patrik Bremdal, Maria Grahn Farley, Jane Reichel, *Principen om fördragskonform tolkning förhållande till Sveriges konventionsåtaganden om mänskliga rättigheter*, Uppsala Universitet, 2017.

⁴ https://funktionsratt.se/wp-content/uploads/2019/12/Funktionsra%CC%88ft-Sverige_Rapport.pdf access 210308.

ANTI-CORRUPTION FRAMEWORK

MEDIA AUTHORITIES AND BODIES MEDIA ENVIRONMENT AND FREEDOM OF EXPRESSION AND OF INFORMATION

8. Do you consider that existing media authorities and bodies effectively contribute to a free and pluralistic media environment? Would you have any positive developments to highlight in this respect? Please contribute to any of the following aspects as relevant.

⇒ Independence, enforcement powers and adequacy of resources of media regulatory authorities and bodies

⇒ Conditions and procedures for the appointment and dismissal of the head / members of the collegiate body of media regulatory authorities and bodies

⇒ Existence and functions of media councils or other self-regulatory bodies

⇒ Other

Hate crimes and cyberbullying such as slander, unlawful threats, molestation, unlawful persecution, and unlawful invasion of privacy threaten democracy. It is important that, for example, elected representatives are protected, which at present cannot be said to be the case to a sufficient extent. But it's not enough. A prerequisite for a functioning democracy is that journalists, researchers, and not least, ordinary people can participate and use their freedom of expression. Everyone, not just elected representatives, must be offered satisfactory protection. At present, the vulnerability is great. It has become an increasing problem that people are silenced by being exposed on social media to threats and systematic, campaign-driven and propaganda-like claims that constitute defamation. At present, it is not only people with limited resources who are more or less considered lawless in this context; but in practice every citizen.

The crimes are prosecuted only exceptionally and the damages awarded are low. The police's failure with the democracy-threatening hate crimes has led to demands for the appointment of a commission, but the problems do not only lie within the police authority but exist throughout the legal chain.

The same applies to a large extent to other network violations. That the police all too often fail to investigate the crimes. Lack of knowledge, even uncertainty about whether crimes on Facebook, Twitter and similar platforms can even be prosecuted in Sweden, has constituted major obstacles.

There are large regional differences both in the way the police and the prosecutors and the courts deal with crime, which makes it doubtful whether it is possible today to talk about equality before the law.

An example is a private non-profit association, which with a couple of employees for a couple of years has made over 1200 police reports, which so far has led to over 200 convictions for incitement against ethnic groups on social media.

It is not reasonable that this important task, to detect and report crimes threatening democracy, lies with civil society, it is the responsibility of the state. With regard to incitement against ethnic groups, the system should affect the extent of the punishment.

Unsettling and especially illegal online molestation must be tried more often.

Something similar applies to the crime of incitement, which when it takes place online is not considered by the legal community for unclear reasons to be as serious as if it took place in traditional media. Online incitement should be tried legally to a greater extent than is the case today.

In cases where individuals rooted in violent extremist environments are behind hate crimes and cyberbullying, the investigation work should be coordinated to a greater extent. Scouting and production of situation images must be an integral part of the work. Furthermore, links to violent extremism regarding cyberbullying should lead to public prosecution.

TRANSPARENCY OF MEDIA OWNERSHIP AND GOVERNMENT INTERFERENCE

Do you consider that there is a sufficient level of trust in public service media and commercial media in your country? Are you aware of any research in this area?

There is a need for strengthening public service independence, but not only in view of the developments taking place in countries with authoritarian regimes, which are rather mangrantly seeking to take control of public service. Current experiences from Denmark, where, among other things, sharp cuts have been made, also show with frightening clarity what can happen when public services independence is not guaranteed.

The danger to the independence and finances of the three institutions Swedish Radio, Swedish Television and Swedish Educational Radio may also have increased after the area is financed via the tax slip. There may be reasons to ensure independence and finances for public service in the Budget Act as well. We believe that the Public service must be given a more precise and strengthened constitutional protection and that Public service independence and finances are regulated separately and that this law can in turn receive additional protection by being given a semi-constitutional status.

The level of trust in the Swedish public service media is fairly good. However, it is frightening to see the developments within the public service area in some EU- countries such as Poland, Hungary and not least in our neighbor country Denmark. Sweden is not immune against influence from other countries. So there are some actions taken in order to secure the independence for these media institutions. The Swedish public service institutions are three, the Radio of Sweden, the Television of Sweden och the "Education Radio" "utbildningsradion"

There is a higher risk for these three institutions' independence and economy since January 2019, when the radio- and TV fee was waived and replaced by a tax withdrawn from the annual tax declaration. Hence, this is one reason to focus on ensuring independence and economy for the public service.

A parliamentary committee has given a bill to ensure public service independence and eliminate threats towards its independence, "An independent public service for everybody - new possibilities and strengthened responsibility, SOU 2018:50". Moreover, a commission has been reviewing the Freedom of the Press Act and the Fundamental Law on Freedom of Expression; "Some issues of the area of Freedom of the Press and Expression ". The commission has suggested how public service could be ensured in the constitution. However, after lots of discussions, the majority of the political parties in the Parliament were against the bill. So, there is no constitutional law concerning the protection of the independence of public service so far. However, the discussions are still ongoing and will probably be a part of the future agenda.

The Swedish Section of the International Commission of Jurists still prefers a constitutional law to ensure public service independence. This independence should also be part of the budget law. This law could be even stronger if it would be given a semi constitutional position.

FRAMEWORK FOR THE PROTECTION OF JOURNALISTS AND OTHER MEDIA ACTIVISTS

Do you consider that existing laws, measures and practices ensure an adequate framework for the protection of journalists and other media activists in your country? Would you have any positive developments to highlight in this respect?

Self-censorship is now a major problem in Sweden. Journalists continue to be under attack, primarily by the far right. There are also examples of threats emanating from state-actors such as China and Iran. The situation is most dire for freelance journalists and independent activists lacking the support of the growing security departments of major media houses and public service media. Trust in law enforcement remains low, especially among the most vulnerable and unprotected. Many crimes (the majority) go unreported.

Sweden has through its new media support system granted editorial support money to extremist media outlets including a publication that has been banned from YouTube for hate speech and Covid-19 disinformation. A democracy clause should be added to prevent this from happening in the future. To have taxpayers fund extremists who spread hate and disinformation is highly problematic. Journalists, law enforcement personnel, civil rights activists and minorities are among those targeted.

PROCESS FOR PREPARING AND ENACTING LAWS

Have you found evidence of any laws, measures or practices that impair the legality and transparency of the process for preparing and enacting laws in your country? Would you have any positive developments to highlight in this respect? Please contribute to any of the following aspects as relevant.

⇒ Framework, policy and use of impact assessments, stakeholders'/public consultations (particularly consultation of judiciary on judicial reforms), and transparency and quality of the legislative process

⇒ Regime for constitutional review of laws

Even though Sweden has a well-established democratic process in terms of legislation, an inquiry is often appointed without adequate consideration being given to Sweden's international agreements on human rights. As recently as 2021, the parliament has for instance proposed that no further time limit will be introduced for pre-trial detention, which is inconsistent with Sweden's international agreements. The ICJ and CRD therefore consider that relevant regulations, including kommittéförordningen (1998:1474) that regulate state inquiries in the established legislative process, need to be amended and impact assessments need to be carried out so that the transformation of rights in ratified conventions is included in all new legislative proposals.

An other area of concern is legislative measures during the pandemic. Before the government takes a position on a proposal, it is sent for consultation to the relevant authorities, organizations, municipalities and other stakeholders. The public also has the right to comment on the proposals. In connection with the ongoing pandemic, the government has accelerated the legislative chain in a way that is worrying. In some examples, the consultation procedure has been as short as one day, which in all circumstances must be unreasonably short.⁵

INDEPENDENT AUTHORITIES

Do you consider that existing independent authorities such as national human rights institutions, ombudsman institutions, equality bodies and other similar bodies enjoy sufficient independence, capacity and powers? Would you have any positive developments to highlight in this respect?

Sweden has no National Human Rights Institution (NHRI). However, the Government is currently working on a Government Bill after having allocated funds in the 2021 state budget

⁵ See for instance:

<https://www.regeringen.se/remisser/2020/06/remisser-s202005402sf-och-s202005401sf/> and <https://www.dagensarena.se/innehall/coronalagen-kritik-mot-rekordkort-remissrunda/>.

and having consulted the Council on Legislation.⁶ ICJ Sweden reiterates its demands that the anticipated NHRI should be established as a separate authority with explicit constitutional protection against government interference as soon as possible.

The Equality Ombudsman works primarily with information and a weak form of law compliance inquiry procedure, and brings only a few lawsuits every year.⁷ A new head of the Equality Ombudsman started his mandate on December 1 2020.

ICJ Sweden are concerned that the mandate of the anticipated NHRI in combination with the work of the Equality Ombudsman and other authorities does not fulfil sufficiently the right to access to justice for individuals claiming to be victims of discrimination and other forms of human rights violations.

ENABLING FRAMEWORK FOR CIVIL SOCIETY

Have you found evidence of any laws, measures or practices that unduly reduce state authorities' accountability negatively impact on civic space and/or reduce the activities of civil society organisations and/or activists and rights defenders? Would you have any positive developments to highlight in this respect? Please contribute to any of the following aspects as relevant.

Extreme right-wing movements including organised nazis negatively impact the rights to freedom of speech, freedom of assembly and security of other people, including those that choose to organize themselves peacefully for human rights, by misuse of what they claim is their right to exercise their freedom of speech, assembly and manifestation. There is a parliamentary committee that inquires the possibility to prohibit certain racist and militant organisations in compliance with the constitution (2 chapter 24 section of the Instrument of Government).⁸

OTHER SYSTEMIC ISSUES

Are there other systemic issues you would like to report on, which have an impact on the national rule of law environment? Please contribute to any of the following aspects as relevant.

⇒ Widespread human rights violations or persistent protection failures

⁶ Excerpt from protocol at meeting February 10 2021 on <https://www.lagradet.se/wp-content/uploads/2021/02/Institutet-f%C3%B6r-m%C3%A4nskliga-r%C3%A4ttigheter.pdf>. See more on <https://www.regeringen.se/rattsliga-dokument/lagratsremiss/2021/01/institutet-for-manskliga-rattigheter/>.

⁷ See <https://arenaide.se/wp-content/uploads/sites/2/2020/11/svenaesus-2020-tio-ar-med-diskrimineringsombudsmannen-komprimerad.pdf>.

⁸ Dir. 2019:39 prolonged to be delivered on March 30 2021 in additional directives to the Committee on prohibition against racist organisations, dir. 2020:134. See more on <https://www.regeringen.se/rattsliga-dokument/kommittedirektiv/2019/07/dir.-201939/>.

In the Swedish labor market, foreign employees and undocumented workers in practice lack effective legal protection. Foreign workers who perform work in Sweden but are employed in long contract chains and undocumented have an increased risk of being exposed to inhumane working and employment conditions, which in some cases can be seen as human trafficking and include labor exploitation.

These workers can be exposed to unacceptable work environments that can lead to serious work injuries and, in the worst case, death. This takes place in, for example, berry picking, the construction sector, the restaurant sector, the agricultural sector and housework. These groups have virtually no access to any remedies. Such a labor market contributes to distorted competition, which disadvantages all workers.

Unlicensed and undocumented workers in Sweden are referred to undeclared work, especially in sectors that offer low-paid jobs. Unfortunately, those who exploit these people today can do so almost without risk and with high profits. People who go underground become easy to use for obvious reasons. Sometimes it degenerates and becomes a slave-like relationship. Salaries that are not paid. Working days that never end. Shameless deductions for food and sleeping space and risky work that occurs.

Foreign workers who are employed by foreign contracting companies and who are included in long contracting chains with a Swedish client at the top work in sectors that offer low-paid jobs. In Sweden, these workers are often allowed to do very dangerous work, often without proper risk assessments or with comprehensible information about the risks.

IMPACT OF COVID-19

What are the most significant impacts of the COVID-19 outbreak and the measures taken to address it for rule of law and human rights protection in your country? Are you aware of any good practices set in place by state authorities aimed at mitigating these challenges? Please contribute to any of the following aspects as relevant.

The Swedish strategy to respond to the pandemic relies on social distancing recommendations rather than restrictions by law. Although there have been some restrictions by regulations, the Swedish people have not experienced a lock-down that entirely prohibits free movement. During spring 2020, several laws were passed, which affected school education, restaurants, and public gatherings and events. On 2 April 2020, the parliament decided on a law that enables the Government or authority after delegation from the Government to enact changes in the right to certain economic benefits in the social insurance act. Regarding financial measurements, most of the Government's economic measures aim to help businesses and prevent unemployment.

The measures taken by the Government have affected certain groups more severely than others. As for the restrictions, many groups in society, who cannot work from home and avoid public transportation, have been unable to protect themselves. Also, information in

languages other than Swedish was initially unavailable, making it hard to reach out to people who already are in a vulnerable socio-economic situation.⁹

Use of personal protective equipment such as masks have been explicitly forbidden in certain contexts and locations (examples reported in the news include public transport, courts, care homes and schools). The situation improved slightly at the end of 2020 as the authorities' resistance to WHO:s mask recommendations weakened, some local mask bans were subsequently lifted.

People in Sweden with a foreign background are disproportionately affected by the pandemic. According to statistics published by the Swedish Public Health Agency, people with a foreign background were overrepresented among those in need of hospital care and death due to covid 19.¹⁰ Also, those municipalities affected are home to several of Sweden's socio-economically vulnerable areas.

Furthermore, information on covid-19 was initially not available to people with hearing and/or visual impairments. Persons with deafblindness have significant challenges adjusting, and it is difficult to fully keep a distance when you need personal assistance. However, people with personal assistance as form of user-led service have been getting ill to a lesser extent by Covid-19, than those that have home services or those that live in a particular living arrangement such as group home or home for the elderly people where the individual has less control of who delivers the services and how it is delivered.¹¹ Even before the pandemic, persons with disabilities suffered from a lack of support and resources according to their rights that the state and municipalities should provide. As the pandemic's economic effects worsen, persons with disabilities suffer more than the population at large. Regarding statistics from the Swedish Public Health Agency, persons with disabilities are overrepresented in the statistics compared to the population at large.¹² Overrepresentation in deaths also affected the elderly at health care centers.

No specific measures have been taken to strengthen women's access to justice. Victims of sexual and gender-based violence are at greater risk due to the limited social contact and their possibility to ask for and receive help. Several organizations and municipalities are reporting an increase in honor-related violence, such as forced marriage.¹³

⁹See [Coronapandemin och socioekonomiska skillnader](#)

¹⁰See

<https://www.folkhalsomyndigheten.se/nyheter-och-press/nyhetsarkiv/2020/juni/fodseland-och-risken-att-drabbas-av-covid-19/>

¹¹ See

<https://assistanskoll.se/20201027-Flyckt-Social-smittade-legre-i-assistanshtml.html>

¹² See

<https://www.socialstyrelsen.se/statistik-och-data/statistik/statistik-om-covid-19/statistik-om-covid-19-bland-personer-med-funktionsnedsattning/>

¹³See

<https://www.jamstalldhetsmyndigheten.se/nyhet/coronapandemin-okar-risken-for-vald-mot-kvinnor-och-barn>

ICJ Sweden and CRD finds it necessary that the Government's economic package includes social protection and support to the most affected by the pandemic and those that risk further exclusion.

Many civil society organizations find it challenging and are unable to perform humanitarian and human rights work due to the restrictions. The lack of financial measures to help NGOs is concerning, and most NGOs are currently focusing on surviving the pandemic. Hence, civil society will not be able to develop progressively without financial measurements from the Government.¹⁴

ICJ Sweden and CRD are concerned about shrinking space and NGOs' influence due to lack of support and financial measurements. We urged the Government to secure emergency support for civil society organizations, particularly organizations that do voluntary work.

Furthermore, we have made observations regarding suspected corruption within several municipalities concerning deviations from the Public Health Agency's vaccination guidelines. In this case, the deviations are linked to executives within the health care sector who have vaccinated themselves and their families before priority groups. These concerns were emphasized by Transparency International Sweden, amongst others.¹⁵

Do you consider that state authorities have made adequate and sufficient efforts to counter disinformation over the COVID-19 pandemic and/or increase people's trust in public service media and commercial media in your country?

COVID-19 denialism has been a problem in Sweden. The controversial GBD, the Great Barrington Declaration, sponsored by the libertarian think tank AIER, has prominent Swedish signatories who have been given expert roles by Swedish public service media.

The public health authorities could have done much more to spread the insights from WHO's infodemic work, in particular in countering false information regarding personal protective equipment and transmission ways. Government information has not been fully accurate and up to date with research which has led to a number of problems and dilemmas for the media. Public COVID-19 debate has been marred by threats and slander; some researchers, in

See more on

<https://skr.se/covid19ochdetnyacoronaviruset/socialtjanstaldreomsorgfunktionsnedsattning/riskforokatvaldmotkvinnorochbarn.32700.html>

¹⁴ See

<https://mrfonden.se/wp-content/uploads/2020/06/joint-swedish-civil-society-response-covid-19.pdf>

¹⁵ See <https://www.transparency.se/nyheter/cpi2020-press>

See more on

<https://sverigesradio.se/artikel/misstankar-om-vaccinationsfusk-kan-vara-korruption>

particular those arguing for WHO and ECDC recommended interventions such as test-trace-isolate have been ridiculed.

There are also actors who engage in anti-vaccination activism, a few with links to the aforementioned GBD, but that type of disinformation is mainly spread in social media. Public service and major commercial media have been relatively good at countering anti-vaccine disinformation.

Due to high death rates during spring 2020, particularly among the elderly, the Swedish Government appointed the Corona Commission (Coronakommissionen) to review the national COVID-19 response.¹⁶ On Dec 15, 2020, the Corona Commission concluded that “the single most important factor behind the major outbreaks and the high number of deaths in elderly residential care is the overall spread of the virus in the society .” In addition to the COVID-19 strategy, the Commission pointed that there are other unresolved structural factors related to the organization of the care of older people in Sweden.

¹⁶ See <https://coronakommissionen.com/om-kommissionen/>