
Sweden

Swedish Institute for Human Rights

Executive summary (max 150 words)

During 2025, the Swedish Institute for Human Rights (SIHR) has seen challenges affecting the structures supporting the SIHR, although not to a degree that compromised its operations, independence or compliance with the Paris Principles. These concerned limited governmental responsiveness to SIHR's recommendations and shortcomings in the appointment process affecting pluralism within the SIHR board.

In its engagements with civil society organisations and human rights defenders, the SIHR has seen a reported shrinking civic space, increased threats, reduced influence, and growing self-censorship, alongside declining and more insecure funding, heavier administrative burdens, and a shift toward civil society acting more as service providers than as independent voices and advocates.

Over several years, recurring deficiencies in the legislative process have been identified. Civil society organisations have noted a departure from established practice, particularly regarding the limited inclusion of relevant actors in consultations. In addition, both inquiry timelines and consultation periods have in several cases been very short, which the SIHR has raised concern about for a couple of years. SIHR warns that continued erosion of constitutional preparatory requirements risks undermining trust in the legislative process.

NHRIs' establishment, independence, effectiveness and resilience

International accreditation status and SCA recommendations

The Swedish Institute for Human Rights (SIHR) was accredited¹ with A-status for the first time in October 2024.

¹ <https://www.ohchr.org/sites/default/files/documents/countries/nhri/report-sca-second-session-2024-en.pdf>

Noting that the law is silent on the procedure by which Board members are appointed by government, the SCA encouraged the SIHR to continue its engagement with government to advocate for the formalisation of a clear, transparent and participatory nomination, selection and appointment process that promotes merit-based selection in relevant legislation, regulations, or binding administrative guidelines. It further recommended the SIHR advocate for amendments clarifying the rules, process, and safeguards in place for the dismissal of Board members.

Acknowledging that in practice, the SIHR engages in both human rights promotion and protection activities and has actively addressed key human rights concerns in country, the SCA encouraged the NHRI to advocate for the inclusion of an explicit mandate for promotion and protection. Further, it encouraged the SIHR to continue its engagement with Parliament on its annual and thematic reports, as well as to advocate for amendments to its enabling legislation that would explicitly establish a process for the institution's reports to be circulated, considered, and discussed by the legislature.

The SCA encouraged the SIHR to take measures to ensure broad representation in its staffing, as well as to enhance its regional cooperation and engagement with diverse parts of society in all regions of the country.

Finally, the SCA recommended that the SIHR continues to advocate for a progressive increase in funding, in line with the inquiry preceding the establishment of the SIHR, to ensure that the NHRI is enabled to carry out the full breadth of its mandate, engage with marginalized groups, and to increase its staff complement. The SCA further encouraged the SIHR to continue to engage with government on the way it processes and responds to the institution's budget requests and protects the NHRI from disproportionate budget cuts.

Follow-up to recommendations on NHRIs and relevant developments

Adoption of a plan for the implementation of the SCA's recommendations

In October 2025, the Board of the Swedish Institute for Human Rights (SIHR) adopted a plan for the implementation of the SCA's recommendations as well as other shortcomings that SIHR consider important to address over time in order to be able to fully comply with the Paris Principles. In total, the plan comprises 21 measures, divided into six different areas. They will be followed up by the SIHR Board and runs until 2028. (SCA re-accreditation is expected to take place in 2029.)

A key measure concerns an analysis of how the legislative gaps identified by the SCA would be addressed within the legal and political context in which SIHR operates. Other measures address those aspects of the SCA's recommendations that do not concern legislation. These include measures that (a) further develop SIHR's dialogue with the national parliament in connection with the annual reporting, (b) increase pluralism among staff, (c) strengthen working methods from the viewpoint of regional and local accessibility perspectives, (d) actively follow up on the budgetary treatment of the SIHR's appropriation, and (e) otherwise act effectively within the mandate to promote and protect human rights.

Under the plan an analysis is being carried out with regards to SCA's recommendations on legislation, including assessing the national legal framework when it comes to SIHR's mandate in times of crisis and armed conflict. The analysis will be completed in 2026.

Other measures linked to the SCA's recommendations include an inventory of the regions and municipalities, that SIHR has visited as part of its activities, as well as various professional development initiatives for staff to strengthen understanding of, and efforts related to, pluralism among employees and protection against threats and hate.

Lack of follow-up from the Government to SCA recommendations

As reflected by SIHR in the 2025 rule of law report², SIHR has informed both Government and the national Parliament about the recommendations from SCA and the corresponding commitments by Sweden under the Paris Principles. However, during 2025 and on the part of the Government, there was a lack of clarity as to its willingness to engage in the matter. For example, the budget appropriations for 2026 were not increased in line with the SCA's recommendation and SIHR's current budget request. Instead, the Government allocated SEK 54,840,000 for 2026, which, when converted to 2025 price levels, constitute a mere status quo. Nor did the Government comment on the budget request by SIHR, despite the importance attached to such a dialogue by the SCA.

Further, the 2026 Government budget bill's sub-section on progress relevant to implementation of the 2017 Government strategy for the national work on human rights does not mention that SIHR achieved A-status-accreditation at the end of 2024. Indeed, the SIHR has not noted any official recognition on part of the Government that this core achievement has been made.

² <https://rule-of-law.ennhri.org/export?country%5B0%5D=50&year%5B0%5D=2025>

Follow-up from the Swedish Parliament

Regarding the Swedish Parliament's consideration of the 2025 Annual Report³, the good practice of assessment and discussion in plenary, developed by the Committee on the Constitution during 2023 and 2024, continued in 2025. However, no additional steps towards a formalisation of the routines in terms of proposals for amendments to the enabling law or other instrument was taken.

No official and concrete follow-up by national authorities on findings from the European Commission regarding the SIHR

In the chapter on Sweden in the European Commission's 2025 Rule of Law Report⁴, SIHR's successful A-status-accreditation in 2024 as well as shortcomings relevant to funding and the appointment of board members are given particular attention (see further pp. 16–17). However, there has been no official and concrete follow-up measure or response from Government or other actors in either case.

Regulatory framework and mandates

The national regulatory framework applicable to SIHR has not changed since January 2025. Besides the mandate of the NHRI, SIHR also has the mandate of CRPD national monitoring mechanism.

In 2025, a government inquiry was appointed to examine challenges in the implementation of the revised EU Directive⁵ on combating trafficking in human beings and to propose necessary amendments to Swedish law and policy. In its final report⁶, published in December 2025, the inquiry proposes that the SIHR be designated as the independent monitoring mechanism pursuant to Article 19(3) of the revised Directive and Article 29(4) of the Council of Europe Convention on Action against Trafficking in Human Beings. An amendment to the Act on the SIHR is proposed for this purpose, with a suggested entry into force on 1 January 2027. The inquiry has had close dialogue with the SIHR ahead of the proposal. The proposal is yet to go through the legislative process and finally be voted on in Parliament.

³ <https://mrinstitutet.se/vara--publikationer/rapporter/rapporter/2025-03-31-arsrapport-2025-om-manskliga-rattigheter-i-sverige>

⁴ https://commission.europa.eu/document/download/72c47621-433b-4def-8aa0-d0cb2daafaf5_en?filename=2025%20Rule%20of%20Law%20Report%20-%20Country%20Chapter%20Sweden.pdf

⁵ <https://eur-lex.europa.eu/eli/dir/2024/1712/oj/eng>

⁶ <https://www.regeringen.se/contentassets/7c1f4900052d4180848c2503cad69110/ett-nytt-brott-och-andra-atgarder-mot-manniskohandel-sou-2025119/>

The government inquiry examining Sweden's implementation of the EU's Migration and Asylum Pact concluded that Sweden already fulfils the regulations' requirements for an independent monitoring mechanism under the EU Screening Regulation and the EU Asylum Procedure Regulation through the Parliamentary Ombudsman. In its remittal response⁷, the SIHR concluded that the inquiry's proposal does not meet the regulations' requirements for such a mechanism, particularly given that the mandate is defined too narrowly and that adequate funding is lacking. The SIHR considers that parts of the mandate for an independent monitoring mechanism should be assigned to the SIHR, in light of its expertise in human rights and its experience in monitoring and reporting on human rights in Sweden.

NHRI structural challenges, threats and resilience

During 2025, two main types of challenges affected the structures supporting SIHR, although not to a degree that compromised its operations, independence or compliance with the Paris Principles. These concerned limited governmental responsiveness to SIHR's recommendations and shortcomings in the appointment process affecting pluralism within the board.

Limited governmental responsiveness to recommendations from SIHR

The Government has responded publicly to only one recommendation from SIHR, namely in relation to its decision in September 2025 to evaluate the national human rights strategy and develop a new one, explicitly referring to SIHR's recommendation. This remains the only instance of an open response to the SIHRs recommendations since its establishment in January 2022.

Shortcomings in the appointment process of the new board members

In the 2025 rule of law report⁸, the SIHR reported on the deep concern expressed by its board to the Government over the appointment of new board members. In its annual review⁹ of the Government, the Committee on the Constitution (KU) examined 32 cases involving complaints submitted by Members of Parliament, one of which concerned the Government's appointment of members to the board of the SIHR. In its review, the Committee on the Constitution noted that the Government had stated that few of the 2024 nominations received, included individuals with experience of qualified work within civil society. For this reason, the Government had made an inventory of persons who had previously been proposed for the board, with the aim of identifying

⁷ <https://mrinstitutet.se/vara--publikationer/remissvar/remissvar-2025/2025-12-23-migrations--och-asyllpakten>

⁸ <https://rule-of-law.ennhri.org/export?country%5B0%5D=50&year%5B0%5D=2025>

⁹ <https://data.riksdagen.se/fil/814F9A66-C408-4A43-B020-17E1C1F70108>

such experience, and subsequently appointed one of those who had that background. The Committee then concluded¹⁰ that the reason this situation had arisen may have been a consequence of shortcomings in the invitation to submit nominations. However, the Government has neither regulated, nor adopted written guidelines for the nomination and appointment of SIHR board members during the period under review.

Crisis preparedness framework

The SIHR has a crisis preparedness framework in place, including a crisis management team that can be activated to manage a crisis while maintaining ongoing operations. In connection with the crisis situation that arose in spring 2023 when the very existence of the SIHR was threatened, the support from ENNHRI was of great value, coupled with the support the SIHR received from the UN High Commissioner for Human Rights. The support from civil society organizations was also of great value.

Approaches to strengthening the resilience of the NHRI

Within the framework of the action plan addressing the SCA's recommendations, SIHR is analysing the legal preconditions for the SIHR's mandate in situations of peacetime crises and armed conflict. The results of the analysis will complement other background studies underway to prepare the SIHR's future measures as regards SCA's recommendations on national legislation. The Institute also participated in ODIHR's crisis preparedness exercise for NHRIs in Warsaw on 14–15 October 2025. In December, a full-day training session was also organised for SIHR's Crisis Management Team.

NHRI's recommendations to national authorities and regional authorities

The Swedish Institute for Human Rights recommends to national authorities:

1. To strengthen legal and procedural safeguards for the nomination and appointment of board members, in line with the SCA recommendations.
2. To establish a formalised process for follow-up to SIHR's reports and recommendations, in line with the SCA recommendations.

¹⁰ https://www.riksdagen.se/sv/dokument-och-lagar/dokument/betankande/granskningsbetankande_hc01ku20/

Human Rights Defenders (HRDs) and civil society space

During 2025, the SIHR conducted a national survey on the situation of human rights defenders (HRDs) in Sweden (hereinafter the SIHR's baseline study on HRDs). The survey was based on a questionnaire for approximately 100 professionals working with human rights across civil society, the public sector and a few other relevant fields (academia and private sector), with follow-up interviews with 13 HRDs representing various segments of the domestic human rights movement, including but not limited to women HRDs. The explicit purpose of the work is to establish a baseline for future follow-up activities and studies, and to make visible experiences that would otherwise risk remaining fragmented and confined to individual cases and accounts. The report has not yet been finalised at the time of this input.

In parallel, the SIHR maintained active national and international engagement on issues related to civic space and the situation of human rights defenders, as highlighted during the visit of both UN special rapporteur on environmental defenders under the Aarhus Convention Michel Forst and UN special rapporteur on the situation of human rights defenders Mary Lawlor. Their international mandates coupled with active engagement with HRDs, media and state actors during their visit, have increased attention to the rights and the corresponding State obligations for HRDs in Sweden, and complemented the information collated by SIHR to the baseline study (as the SIHR assisted the visits and acted as co-facilitator during some of the meetings).

In 2025, SIHR also contributed to ENNHRI activities relevant to HRDs, the ODIHR Academy and in other national and international forums.

Taken together, these experiences have further underscored the need for long-term, systematic efforts to strengthen the protection and legitimacy of human rights defenders in Sweden.

The information on HRD in this report is based on what emerged during the SIHR's work, together with information gathered by the SIHR during the UPR review process as well as the SIHR's supplementary report to the UN Committee on the Elimination of Racial Discrimination.

Challenges for HRDs and restrictions to civic space

Several civil society organisations participating in Sweden's 2025 Universal Periodic Review reported a shrinking civic space¹¹, citing increased threats, reduced influence, and growing self-censorship, alongside declining and more insecure funding, heavier administrative burdens, and a

¹¹ <https://mrfonden.se/wp-content/uploads/2024/10/joint-cso-submission-sweden-pdf.pdf>

shift toward civil society acting more as service providers than as independent voices and advocates.

Also a number of organisations, researchers and rights-holders that the SIHR has consulted with as a part of its supplementary report to the UN Committee on the Elimination of Racial Discrimination¹² have described worsening conditions for civil society more broadly.

Visit of the UN Special Rapporteur on human rights defenders

In December 2025, the UN special rapporteur human rights defenders was invited and supported by SIHR to visit Sweden. Lawlor raised concerns in Swedish media¹³, about growing pressure on civil society actors and HRDs in Europe, noting that Sweden is not immune to broader trends of shrinking civic space, delegitimization and hostility towards rights-based work. Her statements also highlighted the importance of safeguarding independent institutions and ensuring that human rights defenders can operate without fear of stigmatisation, reprisals or undue political pressure.

Visit of the UN Special Rapporteur on Environmental Defenders under the Aarhus Convention

In early 2025, the SIHR assisted the visit of UN Special Rapporteur Michel Forst to Sweden taking place on 3–5 March 2025, contributing to meetings with environmental defenders from mainstream and autonomous movements as well as journalists and other stakeholders.

In the lead up to his visit, the Special Rapporteur had submitted two formal communications to the Government of Sweden where he described circumstances which, based on the available information, raised concern that individuals engaging in peaceful environmental defence may have faced undue reprisals by Swedish State authorities. One of the communications¹⁴ concerned a person who had reportedly been subjected to intrusive treatment in police custody, remained under criminal suspicion for an extended period without charge, and subsequently had her application for Swedish citizenship rejected following her participation in a peaceful climate protest. In the communication, the Special Rapporteur concluded that if substantiated, such measures may be disproportionate and potentially incompatible with the protection afforded

¹² <https://mrinstitutet.se/download/18.38c3ea10198caefbfa74f5a/1756106282166/report-upplementary-information-to-the-UN-Committee-on-the-Elimination-of-Racial-Discrimination.pdf>

¹³ <https://www.aftonbladet.se/nyheter/a/V6RX11/harda-fn-kritiken-utvecklingen-i-sverige-ar-chockerande>

¹⁴ https://unece.org/sites/default/files/2025-01/ACSR_C_2024_62_Sweden_Letter_of_Allegation_06.12.2024_redacted.pdf

under Article 3(8) of the Aarhus Convention. The other communication¹⁵ concerned an employee of a government authority who allegedly had been dismissed due to her private and peaceful environmental engagement. The Special Rapporteur expressed serious concern that if confirmed the handling of the case constituted a violation of the fundamental rights of environmental defenders to freely manifest their opinions.

During his visit, the Special Rapporteur also expressed concern in Swedish media¹⁶ about the treatment of peaceful environmental and climate activists, warning that disproportionate criminalisation and harsh rhetoric risk creating a chilling effect on freedom of expression and peaceful assembly.

Further, in his report¹⁷ on key trends and challenges to the October 2025 Meeting of Parties to the Aarhus Convention, the Special Rapporteur stated that there are well-documented and serious threats to the rights of environmental defenders, and that, according to his analysis, such measures often do not meet the requirements of proportionality and legitimacy. At the same time, he notes that positive examples also exist. One such example mentioned in the report is the Swedish “dialogue police” model.

SIHR’s input to the Report of the Special Rapporteur on human rights defenders

The difficult situation affecting particularly environmental defenders was also highlighted in the SIHR’s submission to OHCHR’s call for inputs to the then upcoming report to UNGA¹⁸ on the situation of environmental human rights defenders working on climate change and just transition in Sweden by UN special rapporteur on HRDs in June 2025. SIHR highlights political stigmatisation, reduced access and funding, and harsher, inconsistent treatment of environmental defenders by authorities.

Structural challenges for CSOs and HRDs

SIHR has identified **structural challenges for CSOs and HRDs**, such as lack of adequate funding for CSOs and HRDs as well as barriers in access to law/ policy making and meaningful public consultation.

¹⁵ https://unece.org/sites/default/files/2025-02/ACSR_C_2024_Sweden_to_HE_MFA_from_Aarhus_SR_EnvDefenders_complaint_16.08.2024_redacted.pdf

¹⁶ <https://www.dn.se/verige/fn-chef-kritiserar-sveriges-agerande-mot-klimataktivister-djupt-oroad/>

¹⁷ https://unece.org/sites/default/files/2025-11/ECE.MP_.PP_.2025.20.E.pdf

¹⁸ <https://docs.un.org/en/A/80/114>

Decreased public funding and the introduction of uniform democracy criteria

According to the SIHR's supplementary information to the UN Committee on the Elimination of Racial Discrimination¹⁹, the conditions for large parts of civil society have deteriorated. Public funding has decreased, project-based funding has replaced core operational grants, and reporting requirements have become more demanding.

In this context it is relevant to bring up the developments around the so called "democracy criteria"²⁰. As of 1 January 2025, Sweden introduced new, uniform democracy conditions for state funding to civil society, including grants to faith communities and from the Swedish Inheritance Fund, excluding organisations that promote extremism or undermine democracy. The European Commission welcomed the reform²¹ as a significant step forward, while noting concerns from civil society about the need for predictable and objective application to avoid undue restrictions. At the same time, the UN Special Rapporteur on freedom of religion or belief warned that the democracy criteria risk reinforcing a culture of suspicion²² toward faith communities and stressed that Sweden's support system—internationally regarded as good practice—should not be distorted by discriminatory assumptions or politicisation.

Access to law and policy making and meaningful public consultations

During the SIHR's meetings in preparing a supplementary report to the UN Committee on the Elimination of Racial Discrimination, civil society representatives expressed disappointment with the Government's consultation practices, noting that these engagements have increasingly taken the form of information sessions rather than genuine consultations. Following its review of Sweden, the Committee issued strong recommendations highlighting the crucial role of civil society and the need for meaningful consultation and dialogue with civil society organisations working on racial discrimination and human rights. These recommendations are closely aligned with the concerns and proposals raised by the SIHR, including the need to ensure that civil society actors are effectively involved in the development, implementation, and follow-up of anti-racism policies.

¹⁹ <https://mrinstitutet.se/download/18.38c3ea10198caefbfa74f5a/1756106282166/report-upplementary-information-to-the-UN-Committee-on-the-Elimination-of-Racial-Discrimination.pdf>

²⁰ <https://www.regeringen.se/contentassets/85de87192b05497e87baac19b26f3cb5/prop-2023-24-119.pdf>

²¹ https://commission.europa.eu/document/download/72c47621-433b-4def-8aa0-d0cb2daafaf5_en?filename=2025%20Rule%20of%20Law%20Report%20-%20Country%20Chapter%20Sweden.pdf

²² <https://docs.un.org/en/A/HRC/55/47/Add.2>

The development of the Action Plan against Racism and Hate Crime has been frequently cited as an example of insufficient participation by civil society. In particular, Roma participants voiced frustration²³ at being excluded from decision-making processes that affect their communities and from the implementation of related measures.

Threats to CSOs and HRDs

SIHR has also found evidence of **threats to CSOs and HRDs**, such as verbal attacks on CSOs and/or HRDs, physical attacks on CSOs and/or HRDs, negative narratives of civil society and/or HRDs by public authorities or online threats or harassment.

Threats affecting actors working with or on behalf of faith communities and other minority groups

The SIHR has [reported](#) to the UN Committee on the Elimination of Racial Discrimination on growing threats, particularly affecting actors working with or on behalf of Muslim communities, other minority groups, and anti-racism initiatives.

Interviews with Muslim and Jewish congregations and associations further confirm that hate, threats, and vandalism targeting their premises remain widespread. In SIHR's Supplementary information to the UN Committee on the Elimination of Racial Discrimination²⁴, the SIHR calls on the Government to ensure that the right to freedom of religion is fully respected and protected in practice, including for religious congregations and associations, by countering hate crimes, discrimination and intolerance.

In the SIHR's report Exposure of Jewish congregations and associations to antisemitism²⁵ interviewees described Jewish congregations and associations as frequent targets of antisemitic threats and hostility, alongside a growing need among members for safe spaces in which they can openly express their Jewish identity. These developments put excessive pressure on congregations, not only to maintain extensive security measures but also to support members in coping with antisemitism encountered in the wider society. Experiences of antisemitism were reported across the country, but the study suggests that the situation may be particularly

²³ <https://mrinstitutet.se/download/18.38c3ea10198caefbfa74f5a/1756106282166/report-upplementary-information-to-the-UN-Committee-on-the-Elimination-of-Racial-Discrimination.pdf>

²⁴ <https://mrinstitutet.se/download/18.38c3ea10198caefbfa74f5a/1756106282166/report-upplementary-information-to-the-UN-Committee-on-the-Elimination-of-Racial-Discrimination.pdf>

²⁵ https://mrinstitutet.se/download/18.38c3ea10198caefbfa74f9c/1756106591767/report-appendix_Exposure-of-Jewish-congregations-and-associations-to-antisemitism.pdf

challenging in smaller towns where there is limited infrastructure for Jewish life, including Jewish schools.

While antisemitism is long-standing, interviewees reported that threats have increased in frequency and, in some cases, changed in character since the Hamas attacks on Israel on 7 October 2023 and the subsequent war in Gaza. Jewish congregations and associations have faced recurring acts such as antisemitic graffiti and vandalism, including references to Nazism or the Holocaust, as well as messages related to Israel and the Palestinian territories that become threatening when directed at Jewish sites by conflating Swedish Jews with the actions of the Israeli state and imposing collective blame.

In the SIHR's report *Exposure of Muslim congregations and associations to Islamophobia*²⁶ all interviewees reported that their association or congregation had been exposed to hatred, threats, and vandalism, often involving racist or Islamophobic messages. Incidents included graffiti, smashed windows, pork dumped at mosques, threatening letters and emails, verbal threats, suspected gunfire, and Qur'an burnings outside mosques. Several interviewees also described threats directed at individuals, including through private social media accounts. Many observed that hate incidents tend to increase following events related to Muslims in Sweden or internationally, with several linking a recent rise to the war in Gaza.

Associations and congregations described different ways of managing these threats. While many report incidents to the police to make the problem visible, others refrain from reporting in order to protect their members from fear and insecurity. Some have taken precautionary measures to reduce visibility, and several representatives said they no longer feel safe appearing in public. As a result, many associations now focus more on internal activities, while others continue to engage publicly despite limited resources and support from authorities.

National frameworks to support and protect HRDs and CSOs

There are several initiatives, frameworks, or policies for the protection of HRDs at the national level, such as specific practical protection mechanisms for civil society and/or HRDs or specific national strategies to protect HRDs and/or inclusion of HRD protection in human rights action plans.

²⁶ https://mrinstitutet.se/download/18.38c3ea10198caefbfa74f9e/1756106618250/report-appendix_Exposure-of-Muslim-congregations-and-associations-to-Islamophobia.pdf

As part of the SIHR's baseline study on HRDs, SIHR is developing an overview of how the national legal and policy framework relates to the UN declaration on HRDs and to the core elements of relevant EU initiatives in the field, such as the European Democracy Shield, the EU Civil Society Strategy, the Culture Compass and MACS (Monitoring Action for Civic Space).

With regard to key initiatives and pending the conclusions of a more detailed analysis, it should be noted that the Swedish Constitution protects a wide range of the generic rights upon which the HRD-declaration and the activities of human rights defenders are based, including freedoms of expression and opinion, principles of public access to information, legal protection against hate, threats and harassment, protection against unlawful and disproportionate interference with peaceful demonstrations, and the right to an effective remedy.

Swedish law is also characterised by extensive labour law protections, which enable employees to exercise freedom of expression both in the workplace and in their private capacity without discrimination, and by a range of rights relating to public participation in democratic decision-making processes at both national and local levels.

However, there is no specific legislation or coherent policy, strategy or other overarching framework dedicated to the protection of human rights defenders and their rights.

A new Action Plan against Racism and Hate Crime²⁷ has been developed. In the Supplementary information to the UN Committee on the Elimination of Racial Discrimination²⁸, the SIHR welcomes the development of the Plan. However, several concerns have been raised regarding its content and process. Stakeholders have pointed to²⁹ a lack of meaningful inclusion and consultation with civil society in the plan's development. Many have also emphasised that the Action Plan must serve as more than a symbolic document, and that it must also form the basis for policy implementation and political communication. Another recurring concern is that the Action Plan largely treats racism as an issue of individual attitudes or interpersonal conflict and therefore fails to address structural racism effectively. Additionally, during our meetings, criticism was raised over the omission of racism against persons of Asian origin from the Action Plan.

²⁷ <https://www.government.se/information-material/2025/04/action-plan-to-combat-racism-and-hate-crime/>

²⁸ <https://mrinstitutet.se/download/18.38c3ea10198caefbfa74f5a/1756106282166/report-upplementary-information-to-the-UN-Committee-on-the-Elimination-of-Racial-Discrimination.pdf>

²⁹ <https://mrinstitutet.se/download/18.38c3ea10198caefbfa74f5a/1756106282166/report-upplementary-information-to-the-UN-Committee-on-the-Elimination-of-Racial-Discrimination.pdf>

With regard to Government initiatives, an evaluation³⁰ of the Government's national strategy for human rights is currently being conducted by the Swedish Agency for Public Management (Statskontoret), with a mandate to suggest ways in which the cohesive structure that the strategy is based on, can be developed. Within the scope of this process, there is potential to propose measures that could strengthen the national framework for the protection of human rights defenders.

The Government has submitted a proposal³¹ for anti-SLAPP legislation, with the intention that a parliamentary vote take place in spring 2026 and that the legislation enter into force no later than 1 May 2026, which is the implementation deadline under the EU directive.

Gaps in the protection of HRDs nationally

According to SIHR, it is not possible to provide a detailed assessment of the current gaps, but it can be mentioned that there is a lack of a coherent framework as well as well-documented shortages when it comes to the protection of HRD-activities at workplaces and to a treaty-compliant interpretation of international HRD standards.

Activities of NHRIs to support civil society space and human rights defenders (HRDs)

The SIHR works in different ways to support civil society space and human rights defenders. Its work is ongoing and strongly in demand. With the promotional function, SIHR refers to such activities that typically serve to increase the understanding, respect and knowledge of the role of HRDs in society and their rights under international and domestic law.

Baseline survey on HRDs

A key component is the SIHR baseline survey on HRDs, which serves to increase visibility and knowledge. Through this work, experiences are documented, a shared understanding of challenges is developed, and legitimacy of the role of HRDs could be strengthened for issues that might otherwise remain isolated individual accounts from individual HRDs.

³⁰ <https://www.regeringen.se/regeringsuppdrag/2025/09/uppdrag-till-statskontoret-att-folja-upp-och-analysera-regeringens-strategi-for-det-nationella-arbetet-med-manskliga-rattigheter/>

³¹ <https://www.regeringen.se/rattsliga-dokument/proposition/2025/12/prop.-20252664>

Meetings and fora for HRDs

The SIHR holds regular national meetings for HRDs (e.g. in the framework of the National Network of Human Rights Specialists) and was also actively engaged in the preparatory stages of the visits of the two Special Rapporteurs to facilitate a broad and relevant representation of HRD voices.

The SIHR held several seminars and panel discussions during the Human Rights Days³² in Sweden in December 2025, one of which particularly on Human Rights Defenders – the situation in Sweden 2025.

Discussions with municipalities and promotion through public engagement

The SIHR also engages with different duty bearers at different levels in society such as at municipal level. Against the background of the SIHR's report on antisemitism³³, the SIHR initiated meetings with several municipalities in spring 2025 to discuss the situation of Jewish children in schools and the local conditions for Jewish organisations. These discussions indicated that municipalities consider general value-based initiatives insufficient; antisemitism is often not properly identified or reported in schools, and teachers lack the time and practical support needed to address concrete situations.

Another type of promotional activity relates to public engagement and communication³⁴ through news stories and other engagement with the media. Promoting HRDs also involves influencing decision-makers.

Platforms for civil society and HRDs in relation to UN Treaty Body reporting

Through its reports to the UN Treaty Bodies, the SIHR also creates platforms for civil society and HRDs to share their perspectives and voice their concerns. In the preparation of the Supplementary information to the UN Committee on the Elimination of Racial Discrimination³⁵, the SIHR consulted with organizations, researchers, and rights-holders. It also conducted a

³² <https://mrinstitutet.se/aktuellt/nyheter-2025/2025-12-01-fn-granskningar-och-manniskorattsforsvarare-i-fokus-pa-mr-dagarna>

³³ https://mrinstitutet.se/download/18.38c3ea10198caefbfa74f9c/1756106591767/report-appendix_Exposure-of-Jewish-congregations-and-associations-to-antisemitism.pdf

³⁴ <https://mrinstitutet.se/aktuellt/nyheter-2025/2025-03-03-fns-specialrapportor-for-miljoforsvarare-besoker-sverige>

³⁵ <https://mrinstitutet.se/download/18.38c3ea10198caefbfa74f5a/1756106282166/report-upplementary-information-to-the-UN-Committee-on-the-Elimination-of-Racial-Discrimination.pdf>

dedicated session with children's and youth organizations to explore young people's experiences of racism. In total, the SIHR engaged with over 90 individuals.

In preparation for Sweden's 2025 Universal Periodic Review, the SIHR worked actively with civil society organisations. This included cooperation around participation in the UPR pre-session in Geneva in February 2025, as well as the organisation of a national digital pre-session in March 2025 that brought together representatives from civil society and several embassies in Stockholm preparing for the UN review. In developing its UPR report, the SIHR also maintained close dialogue with members of its advisory body, composed of 20 civil society representatives and independent experts, whose input was instrumental in shaping the report's focus and content.

Initiatives to protect civil society space and HRDs

SIHR has also taken initiatives to **protect** civil society space and HRDs, such as monitoring, and issuing recommendations to national authorities.

One of the purposes of the SIHR baseline survey on HRDs is to examine how HRDs perceive their protection needs and the SIHR's corresponding role. Pending the completion of the study and its final conclusions, several measures of protection are already being undertaken, including:

- a) monitoring the situation of HRDs in Sweden,
- b) reporting on observed shortcomings in annual reports and in submissions to UN and European human rights monitoring mechanisms,
- c) providing HRDs with information on their human rights according to international and European standards, and
- d) where appropriate and only with the expressed and prior informed consent of the individuals concerned, exchanging information with UN Special Rapporteurs and representatives of civil society protection mechanisms for human rights defenders.

NHRI's recommendations to national and regional authorities

The SIHR prefers not to issue any detailed recommendations before completing its baseline survey on HRDs in Sweden. However, on a more general level, the SIHR recommends that:

1. Clear and simple definitions of HRDs should be used.
2. Cooperation between HRDs, European institutions and NHRIs should be strengthened, e.g. through information exchange and advocacy initiatives.

Democracy

Law-making process

The SIHR has identified challenges affecting law-making processes, such as limited time of consultations, narrow inquiry directives that has predetermined the outcome and limited use of impact assessments, including human rights impact assessments.

Under Sweden's Constitution (the Instrument of Government ³⁶), the Government is required to prepare legislative proposals carefully and to obtain views from relevant authorities and stakeholders before submitting proposals to Parliament. Failure to comply with these constitutional requirements risks undermining the quality of legislation and may lead to legal consequences, as courts and public authorities may disregard laws that have not been prepared in accordance with constitutional rules. The Supreme Court has affirmed³⁷ that the consultation process is a central component of this constitutional framework.

Over several years, recurring deficiencies in the legislative process have been identified. Civil society organisations have noted a departure from established practice, particularly regarding the limited inclusion of relevant actors in consultations. In addition, both inquiry timelines and consultation periods have in several cases been very short which the SIHR has raised concern about for a couple of years, including in referral responses³⁸ this year. These constraints hinder the ability to provide well-considered and substantiated responses. Furthermore, the simultaneous conduct of multiple inquiries in areas such as criminal and migration policy makes it difficult to assess the cumulative impact of proposed reforms on human rights, which the Institute has also raised concern about in referral responses³⁹ during the year.

A particularly troubling trend is the growing use of inquiry directives that predetermine legislative outcomes, rather than allowing independent analysis of problems and policy alternatives. The

³⁶ https://www.riksdagen.se/sv/dokument-och-lagar/dokument/svensk-forfattningssamling/kungorelse-1974152-om-beslutad-ny-regeringsform_sfs-1974-152/

³⁷ <https://lagen.nu/dom/nja/2018s743>

³⁸ <https://mrinstitutet.se/vara--publikationer/remissvar/remissvar-2025/2025-10-24-tillfallig-verkstallighet-av-svenska-fangelsestraff-utomlands>

³⁹ <https://mrinstitutet.se/vara--publikationer/remissvar/remissvar-2025/2025-12-11-skarpta-villkor-for-anhoriginvandring>

inquiry directives are official instructions that define the purpose, scope, methods, and framework within which an inquiry is to be conducted. Several recent [examples](#) illustrate this concern.

A recurring shortcoming is the absence of systematic human rights impact assessments in government inquiries, which makes it difficult to identify risks at an early stage and to conduct transparent proportionality assessments. This increases the likelihood that new legislation conflicts with constitutional protections and international human rights commitments.

SIHR's actions to address challenges in the context of law-making processes

In addition to raising concern over the above-mentioned issues in numerous referral responses during the year, the SIHR also published an opinion piece⁴⁰ together with the Discrimination Ombudsman in one of the major Swedish newspapers. The SIHR warns that continued erosion of constitutional preparatory requirements risks undermining trust in the legislative process. Sweden's longstanding strength has been a legislative system characterised by integrity, expertise, and thorough consultation. The SIHR concludes that if legislative outcomes are effectively predetermined and expert objections systematically disregarded, the ability of the process to produce legally sound, rights-compliant legislation is seriously weakened.

The SIHR has also, during the year, submitted a written communication⁴¹ to the Ministry of Justice expressing concern about the very short consultation period for the memorandum on the Migration and Asylum Pact. In the communication, the SIHR emphasises that the timeframe for submitting comments does not provide the conditions necessary for a proper consultation process in accordance with the preparatory requirements set out in the Instrument of Government.

To further contribute to addressing the challenges in the law-making process, SIHR developed [guidance](#) on how to carry out a human rights impact assessment in government inquiries. Through this guide, the SIHR has contributed to the Agency for Financial and Public Management's support and guidance to public agencies and government inquiries by providing information on how to analyse the consequences of the proposals for new laws and amendments for Sweden's international human rights obligations⁴².

⁴⁰ <https://www.dn.se/debatt/regeringen-star-inte-over-grundlagen/>

⁴¹ <https://mrinstitutet.se/vara--publikationer/skrivelser-och-yttranden/skrivelser/2025-12-09-angaende-remisstiden-for-promemorian---migrations--och-asylpakten>

⁴² <https://forum.statskontoret.se/konsekvensutredning/beakta-perspektiv/manniskor-och-deras-rattigheter/sveriges-internationella-ataganden-om-manskliga-rattigheter/>

NHRI's recommendations to national and regional authorities

The SIHR recommends to the Swedish Government:

1. To fully comply with the preparatory requirements set out in the Instrument of Government, including, inter alia, timeframes and wide inclusion in the consultation processes.
2. To refrain from issuing inquiry mandates that predetermine legislative proposals and ensure human rights impact assessment are part of every inquiry.

Structural human rights issues which reflect persistent challenges for the rule of law.

The SIHR has identified several structural human rights issues which reflect persistent challenges for the rule of the law in 2025.

EU countries' questioning of the European Court of Human Rights and its interpretation of the European Convention on Human Rights

Following nine EU countries' questioning of the European Court of Human Rights and its interpretation of the European Convention on Human Rights in relation to migrants, in 2025, the SIHR submitted a written communication⁴³ to the Swedish Minister of Foreign Affairs, the Minister of Justice, the Minister of Gender Equality and the Swedish Ambassador to the Council of Europe. The SIHR expressed its concern that both the authority of the European Convention and that of the Court are increasingly being called into question in the political debate. The SIHR believes that a weakening of the European Convention would substantially reduce the individual's protection against state interference and thereby negatively affect the rule of law. The SIHR further believes that it would limit the possibilities for international review and risk leading to a gradual erosion of fundamental rights.

Concerns raised in relation to government inquiries in the field of migration

In 2025, the SIHR raised concerns in relation to a large number of government inquiries in the field of migration, for example in relation to proposals risking increasing legal uncertainty and arbitrariness. In its remittal response⁴⁴ to the government inquiry on the implementation of the

⁴³ <https://mrinstitutet.se/vara--publikationer/skrivelser-och-yttranden/skrivelser/2025-12-04-den-europeiska-konventionen-om-skydd-for-de-manskliga-rattigheterna-och-de-grundlaggande-friheterna--->

⁴⁴ <https://mrinstitutet.se/vara--publikationer/remissvar/remissvar-2025/2025-12-23-migrations--och-asylpakten>

EU Migration and Asylum Pact, the SIHR expressed its concern in relation to migrants' and asylum seekers' legal certainty due to stricter acceleration requirements, limitations on the right to appeal, and shortcomings in the proposed independent monitoring mechanism.

The SIHR criticized another governmental inquiry⁴⁵ proposing to retroactively revoke permanent residence permits emphasizing that retroactive legislation is a severe measure that must be applied with great caution in a state governed by the rule of law. The SIHR also noted that legislation explicitly targeting a specific group risk undermining public confidence as the principles of the rule of law apply equally to everyone.

In 2025, the Swedish government presented an inquiry proposing the inclusion of a requirement of good conduct/moral character (in Swedish "vandel") as grounds for expulsion. Non-citizens could thereby be expelled because they were considered to have led a 'dishonest or disreputable life'. The Institute rejected⁴⁶ the inquiry in its entirety, among others arguing that it violates fundamental rule of law principles, including legality, legal certainty/foreseeability, and equal treatment.

Increase in the number of inmates due to the changes in the criminal policy

The focus of the Swedish criminal policy over the last decade has resulted in a significant increase in the number of inmates. Prison and Probation Service statistics from 2024 show that the occupancy rate in Swedish prisons was 131 percent and there are indications that overcrowding has increased since then (the exact figures for 2025 was not available at the time of writing this section). In addition, the number of prisoners is expected⁴⁷ to increase from around 11,000 today to 29,000 in ten years' time. This development is mainly influenced by the proposals for changes to parole⁴⁸ and the proposals presented in the criminal justice reform inquiry⁴⁹, which include the tightening of around 50 penalties. If this trend continues as planned, Sweden will by far have the highest number of prisoners per 100,000 inhabitants (264) in the EU and more than twice the EU average⁵⁰ (111).

⁴⁵ <https://mrinstitutet.se/vara--publikationer/remissvar/remissvar-2025/2025-12-10-andring-av-permanent-uppehallstillstand-for-vissa-utlanningar>

⁴⁶ <https://mrinstitutet.se/vara--publikationer/remissvar/remissvar-2025/2025-06-24-skarpta-och-tydligare-krav-pa-vandel-for-uppehallstillstand>

⁴⁷ https://www.kriminalvarden.se/globalassets/om_oss/regeringsuppdrag/kriminalvardens-kapacitetsrapport-2025-2034.pdf

⁴⁸ <https://www.regeringen.se/rattsliga-dokument/statens-offentliga-utredningar/2024/07/sou-202448/>

⁴⁹ <https://www.regeringen.se/rattsliga-dokument/statens-offentliga-utredningar/2025/06/sou-202566/>

⁵⁰ https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20250505-1?utm_source

The increase in the number of inmates has led to double occupancy becoming the norm. During the year, the Parliamentary Ombudsman investigated the consequences and risks that may arise when the Prison and Probation Service allows two inmates to share a cell in pre-trial detention centres⁵¹ and prisons⁵². In the two reports, the Parliamentary Ombudsman concludes that the conditions have extensive and serious consequences for inmates and that there is a risk that inmates in prisons are subjected to inhuman or degrading treatment.

To tackle the problem of the strained situation in prisons in Sweden and the planned rapid increase in the number of inmates, proposals have been presented to rent prison places abroad. Sweden has entered into an agreement with Estonia to rent prison places. The agreement states, contrary to what the preceding government inquiry proposed, that Estonian law shall apply and that the institutions shall be staffed primarily by Estonian personnel.

The SIHR rejected the proposals in both the inquiry⁵³ and the memorandum⁵⁴ because the overall consequences of placement abroad will entail a risk that the sentence will not be equivalent to if it had been enforced in Sweden, that there is a risk that international standards for prisoners will not be complied with, and that there is a risk that human rights of inmates will be violated.

Furthermore, the SIHR has raised concern⁵⁵ that the proposal would in fact mean that the Swedish Parliamentary Ombudsmen would have no possibility to supervise how the inmates are treated in prisons in Estonia. The constitutionally established power of oversight needs to be respected, and the Parliamentary Ombudsmen needs to be able to exercise supervision over how inmates are treated.

NHRI's recommendations to national and regional authorities

The SIHR recommends to national actors that:

1. It is important that Sweden continues to affirm the status of the European Convention on Human Rights and underscores the importance of the independence of the European Court of Human Rights.

⁵¹ <https://www.jo.se/app/uploads/2025/02/dubbelbelaggnings-konsekvenser-for-intagna-i-hakte-opcat-rapport-2025.pdf>

⁵² <https://www.jo.se/app/uploads/2025/05/jo-dubbelbelaggnings-konsekvenser-for-intagna-i-anstalt-webb.pdf>

⁵³ <https://mrinstitutet.se/vara--publikationer/remissvar/remissvar-2025/2025-05-06-hyra-anstaltsplatser-utomlands>

⁵⁴ <https://mrinstitutet.se/vara--publikationer/remissvar/remissvar-2025/2025-10-24-tillfallig-verkstallighet-av-svenska-fangelsestraff-utomlands>

⁵⁵ <https://mrinstitutet.se/vara--publikationer/remissvar/remissvar-2025/2025-10-24-tillfallig-verkstallighet-av-svenska-fangelsestraff-utomlands>

2. In its work and proposals in the criminal and migration policy areas, Sweden must ensure that proposed measures comply with Sweden's human rights obligations as regulated in the Swedish constitutional laws and the international conventions that Sweden has ratified.

Other persisting challenges or key developments for the rule of law in your country in 2025.

There are several challenges and developments in relation to rule of law that persist in Sweden.

The importance of ratifying the Optional Protocol to the Convention on the Rights of the Child and the Optional Protocol to the International Covenant on Economic, Social and Cultural Rights

One aspect relates to the possibilities for individuals to claim their rights, nationally but also through international mechanisms. Regarding the latter, the SIHR has repeatedly emphasized the necessity of Sweden ratifying the Optional Protocol to the Convention on the Rights of the Child on a communications procedure as well as the Optional Protocol to the International Covenant on Economic, Social and Cultural Rights. This was also brought up in several recommendations to Sweden under the UPR review. The Swedish government rejected such recommendations arguing that focus should be on domestic remedies. The SIHR finds⁵⁶ that domestic remedies are important but emphasises that the two are not mutually exclusive; rather, they complement each other.

Challenges regarding lay judges and the independence and impartiality of courts

The Swedish system with lay judges, where lay judges are nominated by political parties, raises concerns about the independence and impartiality of courts. In Sweden, lay judges hold equal voting rights to professional judges. The SIHR has numerous times pointed out that it is crucial that lay judges act, and are perceived to act, independently of political influence. The SIHR has repeatedly raised concern over the system through different channels, including in ENNHRI's rule of law reports and a written communication to the Minister of Justice. The SIHR has pointed out that it is important to review the system with lay judges and recommended that the recruitment

⁵⁶ <https://mrinstitutet.se/aktuellt/nyheter-2025/Sverige-och-FN-granskning-vad-accepterades-vad-noterades>

process should be free from involvement of political parties in order to strengthen the judicial impartiality.

In October 2025 a proposa⁵⁷l was submitted by a Member of Parliament to the Swedish Parliament suggesting that the system with lay judges is modified and the politically appointed lay judges are phased out. A number of other proposals suggesting different types of changes to the system with lay judges was also submitted to the parliament in October 2025. However, these proposals do not as such propose to change the recruitment process to be free from involvement of political parties. The issue will be discussed in the Swedish parliament in early February⁵⁸ 2026. Through an email in January the SIHR shared the written communication previously submitted to the Minister of Justice with all the individual members of the committee on justice of the Swedish Parliament.

Positive development in the area of justice

Also in the area of justice, the SIHR saw the positive development as regards the proposed amendments⁵⁹ to the Instrument of Government aiming at strengthening the protection of democracy and the independence of the courts, including stricter rules for constitutional amendments and greater autonomy for the judiciary. This is a positive step toward securing the institutions of the rule of law in the long term.

Prevalence of racially motivated hate crimes and difficulties of victims obtaining redress

In the SIHR's Supplementary information to the UN Committee on the Elimination of Racial Discrimination⁶⁰ SIHR expressed, among other concerns, the prevalence of racially motivated hate crimes and the difficulties faced by victims in obtaining redress after being subjected to racially motivated hate crimes or discrimination. Many of those we spoke to in connection with the report testified that racist undertones in the political debate have contributed to the normalisation of racism, both online and in society at large. Women are affected in distinct ways: Roma women described refraining from using public transport due to fear of harassment, Finnish Roma and Sámi women reported that the visibility associated with traditional clothing increases their vulnerability, Muslim women wearing the hijab described being subjected to hate and threats

⁵⁷ <https://data.riksdagen.se/fil/E9BAAE12-3EE0-4958-8A81-E77A45A3C186>

⁵⁸ https://www.riksdagen.se/sv/dokument-och-lagar/dokument/betankande/processrattsliga-fragor_hd01juu17/

⁵⁹ <https://www.regeringen.se/contentassets/4359c0271e9d4f6fbb616378358e3aa2/starkt-skydd-for-demokrat-in-och-domstolarnas-oberoende-prop.-.pdf>

⁶⁰ <https://mrinstitutet.se/download/18.38c3ea10198caefbfa74f5a/1756106282166/report-upplementary-information-to-the-UN-Committee-on-the-Elimination-of-Racial-Discrimination.pdf>

because of their dress and Asian women reported threats and violence linked to racist stereotypes of sexual availability. In December 2025, the CERD Committee issued several strong recommendations to Sweden, which largely align with the views and proposals put forward by the Institute and by civil society actors in the submissions to the Committee. The Committee concluded that protection against racist hate crimes and hate speech needs to be strengthened and that targeted measures are required to combat hate crimes in the school environment.

NHRI's recommendations to national and regional authorities

The SIHR recommends to national authorities to:

1. Appoint a special investigator with the task to investigate how a new recruitment system for lay judges should be designed without the involvement of the political parties.
2. Expand and prioritise police crime prevention and trust-building measures to encourage more people to report racist hate crimes and prioritise hate crime cases across the justice system to improve the clearance rate.

