

Coronavirus pandemic in the EU – Fundamental Rights Implications

Country: Sweden

Contractor's name: Emerga Institute

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1 Measures taken by government/public authorities

1.1 Emergency laws/states of emergency, including enforcement actions

On 4 April, the Government sent a draft bill to the Council on Legislation for consultation. The draft bill suggested amendments to the Communicable Diseases Act¹ giving the Government the right to introduce certain legal regulations without the Parliament's prior approval – if the changes are considered necessary for the combatting of the virus causing covid-19.² According to the government, this change is needed since the legislation on communicable diseases control is not adequate for meeting all challenges related to covid-19, especially when it comes to introducing quick changes that the government may deem necessary in order to counteract negative developments. The draft bill proposed that the government shall be able to decide on special regulations concerning the relationship between individual citizens and the public sector (*det allmänna*) especially when it comes to the introduction of new obligations or intrusions in the personal or economic lives of the citizens, but only if the decisions can be considered necessary in order to prevent the further transmission of the virus causing covid-19. The draft bill also proposes that the government shall be able to decide on the introduction of special regulations on mutual trade or allocation of medication and other medical equipment in relation to the regions' hospitals and other healthcare facilities if the decisions are made with the aim to maintain efficient barriers against the transmission of the virus. The proposed legislation shall at the most be applicable during a three months period. After some changes specifying the areas in which the government can act without the prior approval of the parliament, the draft bill was developed into a government bill. The government bill which was presented to the parliament on 7 April 2020 clarified that the government can act without such prior approval to introduce:³ 1) temporary restrictions on public gatherings; 2) temporary closure of shopping malls and other retail outlets; 3) temporary closure of social and cultural meeting places, such as bars, nightclubs, restaurants, cafeterias, gym and sports facilities, libraries, museums and public meeting rooms; 4) temporary closure or other restrictions on transport or use of infrastructure, such as ports, airports or bus or railway stations; 5) temporarily enabling the mutual trade or redistribution of medicines or protective materials and other medical equipment to private healthcare providers and other private operators; or 6) temporary measures of a similar nature.⁴ In addition, the bill clarified that the government may issue special regulations on cooperation and mutual trade or redistribution of drugs

¹ Sweden, Communicable Diseases Act (*Smittskyddslag [2004:168]*), 1 January 2020, [available here](#)

² Sweden, Ministry of Health and Social Affairs (*Socialdepartementet*) (2020) Draft for Referral to the Council on Legislation: A temporary authorisation in the Communicable Diseases Act due to the virus causing covid-19 (*Utkast till lagrådsremiss Ett tillfälligt bemyndigande i smittskyddslagen med anledning av det virus som orsakar covid-19*), 4 April 2020, [available here](#)

³ Sweden, Ministry of Health and Social Affairs (*Socialdepartementet*) (2020) Temporary authorisations in the Communicable Diseases Act due to the virus causing covid-19 (*Tillfälliga bemyndiganden i smittskyddslagen med anledning av det virus som orsakar covid-19*), government bill, (*prop. 2019/20:155*), 7 April 2020, [available here](#)

⁴ Sweden, Ministry of Health and Social Affairs (*Socialdepartementet*) (2020) Temporary authorisations in the Communicable Diseases Act due to the virus causing covid-19 (*Tillfälliga bemyndiganden i smittskyddslagen med anledning av det virus som orsakar covid-19*), government bill, (*prop. 2019/20:155*), 7 April 2020, [available here](#)

and medical equipment also in relation to the regions and municipalities, if it is necessary to maintain effective infection control.⁵

The parliament accepted the proposals on 16 April 2020.⁶ The amendments entered into force on 18 April and remain in force until the end of June 2020. The Government is only authorised to decide on the introduction of regulations or measures with reference to the new amendments if it must be considered impossible to wait for the parliament's decision.⁷ If the Government does decide on regulations and measures without the parliament's prior approval, every individual decision must immediately be referred to the parliament for consideration afterwards.

1.2 Measures affecting the general population

On 26 March 2020, the Government decided on a third extra amending budget with proposals on a state business emergency package to milden the economic effects of the virus.⁸ The budget allows for credit guarantees for loans to businesses. The Government proposed the parliament to authorise the government to give credit guarantees of at most 100 billion SEK (€9.3 billion) to credit institutes active in Sweden. The credit guarantees will allow small and middle-sized businesses to loan money, which will help them to face any economic difficulties brought on by the new corona virus. To be eligible the businesses must have their primary activities or headquarters in Sweden and otherwise be economically viable.

On 26 March, the Government decided to apply for the exemption from VAT and customs tariffs from the EU commission in relation to the import of healthcare materials aimed at combatting the corona virus.⁹

The Government's fifth amending budget was presented on 1 April 2020.¹⁰ It included:

- New temporary regulations for unemployment benefits (*arbetslöshetsersättning*)
- A temporary removal of the income limit for student grants and loans during 2020. Usually, students who are granted student grants and loans cannot have an income over a certain

⁵ Sweden, Ministry of Health and Social Affairs (*Socialdepartementet*) (2020) Temporary authorisations in the Communicable Diseases Act due to the virus causing covid-19 (*Tillfälliga bemyndiganden i smittskyddslagen med anledning av det virus som orsakar covid-19*), government bill, (*prop. 2019/20:155*), 7 April 2020, [available here](#)

⁶ Sweden, Swedish Parliament, Committee on Health and Welfare (*Riksdagen, Socialutskottet*) Temporary authorisations in the Communicable Diseases Act due to the virus causing covid-19 (*Tillfälliga bemyndiganden i smittskyddslagen med anledning av det virus som orsakar covid-19*), committee report (*bet. 2019/20:SoU20*), 16 April 2020, [available here](#)

⁷ Sweden, Ministry of Health and Social Affairs (*Socialdepartementet*) (2020) Temporary authorisations in the Communicable Diseases Act from 18 April (*Tillfälliga bemyndiganden i smittskyddslagen från den 18 april*), press release, 17 April 2020, [available here](#)

⁸ Sweden, Ministry of Finance (*Finansdepartementet*) (2020) Extra amending budget for 2020 – Credit guarantees for loans to businesses (*Extra ändringsbudget för 2020 – Kreditgarantier för lån till företag*), Government Bill Prop. 2019/20:142, 26 March 2020, [available here](#)

⁹ Sweden, Ministry of Foreign Affairs (*Utrikesdepartementet*) (2020), Exemption from VAT and customs of import of health care material for the corona virus (*Befrielse från moms och tull vid import av sjukvårdsmaterial för coronaviruset*), press release, 26 March 2020, [available here](#)

¹⁰ Sweden, Ministry of Finance (*Finansdepartementet*) (2020), Fifth extra amending budget to the riksdag (*Femte extra ändringsbudgeten till riksdagen*), press release, 1 April 2020, [available here](#)

amount during a year. If they exceed this amount, they must pay back the grants and loans for the period in question. This aim of the measure is to encourage students to take on extra hours in the healthcare sector or other important sectors.

- Increased funding to expand the testing for covid-19
- State funding for temporary rent reductions for vulnerable business
- Extended credit lines (*låneramar*) for contingency investments for the National Board of Health and Welfare
- Increased support for women and children exposed to violence
- Extra funding for the culture sector and the sports movement
- The government has decided on grants to municipalities and regions to financially support activities within health care and social services as a result of the spread of covid-19 disease. 3 billion is allocated for this purpose.¹¹

On 31 March 2020, the government decided to expand the testing for covid-19 nationally. The decision aims at alleviating the societal effects of potentially substantial losses of personnel within the healthcare sector and other especially important sectors. The government assigned the Public Health Agency (*Folkhälsomyndigheten*) to lead the actors required to expand the testing efforts.¹² Firstly, the assignment concerns expansion of testing that can identify persons who are infected with covid-19. Secondly, testing for immunity will be introduced for affected groups.¹³

On 1 April 2020, the Public Health Agency introduced a number of regulations and general advice (*föreskrifter och allmänna råd*) clarifying different actors' responsibility to prevent the infectivity of covid-19. The regulations apply until 31 December 2020 but may be suspended before then or beyond this date. The regulations establish the specific responsibilities of employers, the public transport companies, shop owners, associations, sport clubs, the Migration Agency, the Prison and Probation Agency, the National Board of Institutional Care, and the general public.¹⁴ The aim of the general advice is of course to prevent further infectivity, and to protect the most vulnerable groups in society, that is risk groups and older persons. According to the regulations of the Public Health Agency, all actors in Sweden are obliged to take measures to decrease the risk of infectivity. It may be to inform the public/clients/customers, create job areas that enables social distancing at work, mark lines of distance in queues, and provide hand washing possibilities.

¹¹ Sweden, Ministry of Health and Social Affairs (*Socialdepartementet*), Ordinance on state subsidies to regions and municipalities to financially support healthcare and social services as a result of the disease COVID-19 (*Förordning [2020:193] om statsbidrag till regioner och kommuner för att ekonomiskt stödja verksamheter inom hälso- och sjukvård respektive socialtjänst till följd av sjukdomen covid-19*), 3 April 2020, [available here](#)

¹² Sweden, Ministry of Health and Social Affairs (*Socialdepartementet*) (2020), Assignment to quickly increase the number of tests for covid-19 (*Uppdrag om att skyndsamt utöka antalet tester för covid-19*), Government Assignment, 1 April 2020, [available here](#)

¹³ Sweden, Ministry of Health and Social Affairs (*Socialdepartementet*) (2020), Increased national testing of covid-19 (*Utökad nationell testning av covid-19*), press release, 31 March 2020, [available here](#)

¹⁴ Sweden, Public Health Agency (*Folkhälsomyndigheten*) (2020) Regulations and general advice on everyone's responsibility to prevent the infectivity of covid-19 inter alia (*Föreskrifter och allmänna råd om allas ansvar att förhindra smitta av covid-19 m.m.*), 1 April 2020, [available here](#)

Social distancing

On 30 March 2020, the Government introduced an ordinance¹⁵ aimed at stopping all visits at nursing homes for the elderly (*äldreboende*). The ordinance entered into force on 1 April.¹⁶ The manager of a nursing home may in the individual case permit a visit if there are special circumstances motivating such an exception and if there is little risk of spreading of the corona virus. Both the National Board of Health and Welfare¹⁷ and the Public Health Agency¹⁸ have published recommendations on the application of the ban, and when exceptions from the ban can be considered. The recommendations from the Public Health Agency mainly concern how to inform concerned parties about the visit ban and how to arrange any visits that have been allowed. The general advice issued by the National Board of Health and Welfare focuses on when exceptions from the visit ban may be considered. According to the authority, exceptions can be made: 1) If there is a need for visits in connection with care in the final stages of life; 2) if there is a need for visits by visitors who have incurable, non-communicable illnesses and who themselves are in the final stages of life; and 3) if a resident has severe anxiety that is considered to be impossible to relieve by any other means than by a visit.

1.2.1 Education

Focus on:

- *Ensuring continuity of education for children from socioeconomically disadvantaged backgrounds, including measures to ensure distance learning for this group*

On 19 March 2020, the parliament introduced a new act on temporary closure of activities in the education sector during extraordinary events in peacetime.¹⁹ On 25 March, the Ministry of Education published information material which clarifies the meaning of the act.²⁰ According to the act, the government may with reference to extraordinary events in peacetime decide to close down preschool and school activities, after-school activities or other activities regulated by the Education Act.²¹ The information material also clarifies the responsibilities of the school principals. Furthermore, the information material explains the changes brought about by the new Ordinance on Education in

¹⁵ Sweden, Ordinance on temporary ban against visits in special forms of housing for older persons in order to prevent the spread of the disease covid-19 (*Förordning [2020:163] om tillfälligt förbud mot besök i särskilda boendeformer för äldre för att förhindra spridningen av sjukdomen covid-19*), 1 April 2020, [available here](#)

¹⁶ Sweden, Ministry of Health and Social Affairs (*Socialdepartementet*) (2020), National restraining order at elderly homes (*Nationellt besöksförbud på äldreboenden*), press release, 31 March 2020, [available here](#)

¹⁷ Sweden, National Board of Health and Welfare (*Socialstyrelsen*), General advice of the National Board of Health and Welfare on the application of the Regulation (2020: 163) on temporary ban on visits to special housing for the elderly to prevent the spread of the disease covid-19 (*Socialstyrelsens allmänna råd om tillämpningen av förordningen (2020:163) om tillfälligt förbud mot besök i särskilda boendeformer för äldre för att förhindra spridningen av sjukdomen covid-19*), 8 April 2020, [available here](#)

¹⁸ Sweden, Public Health Agency (*Folhälsomyndigheten*), Recommendations for visits to special housing for the elderly under the covid-19 pandemic (*Rekommendationer vid besök i särskilda boendeformer för äldre under covid-19-epidemin*), 9 April 2020, [available here](#)

¹⁹ Sweden, Act on temporary closing of activities in the school sector upon extraordinary events in peacetime (*Lag [2020:148] om tillfällig stängning av verksamheter på skolområdet vid extraordinära händelser i fredstid*), 19 March 2020, [available here](#)

²⁰ Sweden, Ministry of Education (*Utbildningsdepartementet*) (2020) Further measures due to the new corona virus (*Ytterligare åtgärder med anledning av det nya coronaviruset*), 25 March 2020, [available here](#)

²¹ Sweden, School Act (*Skollag [2010:800]*), 1 January 2020, [available here](#)

Certain Types of Schools in the Education System during the Spread of Certain Infectivity.²² If the government decides to close pre-schools and compulsory schools in accordance to the new act, the Ordinance on Education in Certain Types of Schools in the Education System during the Spread of Certain Infectivity that entered into force 13 March shall be applicable, that is, the principals shall be given tools to adjust the education to the ongoing situation. This can for example mean that education will be provided online, that all school activities will be closed during a period, and/or the education will be provided in a more concentrated form, for example with classes on Saturdays. The second change is that the National Board of Education (*Skolverket*) may decide to not go through with the national tests if there are no conditions for the pupils to perform them in such a way that the purpose of the tests can be fulfilled. In accordance to this provision, the national tests for the spring term have been cancelled by the authority. The third change includes regulations stipulating that if the government decides to close pre-school and school activities, preschools and after-school centres must still provide day-care for some of the children. Children with parents who partake in societally important activities shall be offered day-care to the extent needed to allow their parents to remain engaged in the socially important activities. Preschools or after-school centres shall also be open for children who for physical, psychological or other reasons need the special support that can only be offered by the preschools or after-school centres. It is the children's home municipality that must offer the day-care in question even if it is the government that decides to close the schools. If a pre-school and school activities are closed by the local principal, it is the same principal's responsibility to offer their pupils day-care for the reasons mentioned above. The ordinance applies until 30 June 2021. On 23 March 2020, the Swedish Minister for Gender Equality had a meeting with the Children's rights Delegation (*Barnrättsdelegationen*) which consists of representatives from civil society organisations and the Ombudsman for Children in Sweden (*Barnombudsmannen*).²³ The organisations raised their concern about the consequences fewer social activities may have for children in vulnerable situations. Among other things, the organisations highlighted the importance of adapting the information about the new virus to children and young persons, and stressed the need of other forms of meeting points where children can meet reliable adults also in situations where they cannot go to school or have leisure activities as usual. The Ministry of Employment will move on with the suggestions and continue its dialogue with the Delegation.

All upper secondary schools (*gymnasier*) are recommended to conduct online and distance education. On 3 April 2020, the Government decided to allow a smaller proportion of pupils in upper secondary schools to get certain education in the school's facilities, given that this is possible with regard to the contagion. One reason is that there is a risk that some pupils otherwise cannot finish their education as planned and thus lose the possibilities to go on to further studies or work in the autumn. As an example, some vocational programs include practical elements that are difficult to perform without access to materials and a physical workplace. It will also be possible to allow smaller groups of pupils to complete certain tests or other important assessment elements in the school's facilities. The decision also allows some pupils with special needs to get the support they need at their schools,

²² Sweden, Ordinance on education in certain types of school in the education system upon spread of certain infectivity (*Förordning [2020:115] om utbildning i vissa skolformer i skolväsendet vid spridning av viss smitta*), 6 April 2020, [available here](#)

²³ Sweden, Ministry of Labour (*Arbetsmarknadsdepartementet*) (2020) Åsa Lindhagen in meeting with the Children's Rights Delegation (*Åsa Lindhagen i möte med Barnrättsdelegationen*), 24 March 2020, [available here](#)

individually or in smaller groups. The decision²⁴ is regulated through amendments of sections of the Ordinance on Education in Certain Types of Schools in the Education System during the Spread of Certain Infectivity.²⁵

On 23 April 2020, the government proposed an increased capacity of the higher education system to admit more student.²⁶ The changes in the labour market due to the corona virus have led to an all-time high increase of the number of applicants to all kinds of studies. To assure that more people can begin their studies already this summer, the government has proposed to increase the number of students on summer courses with an additional 6000. The measure is estimated to cost 177 million SEK (€16.4 million) including student finance, which includes grants and loans (*studiemedel*). To increase the number of students in programmes leading to professions in shortage within the healthcare and tech areas, an additional 4000 students will be admitted to competence-giving education courses (*basår*).

On 24 April 2020, the government announced an one-year extension of the possibility to issue final grades in the municipal adult education (*komvux*).²⁷ This extension will support students who are affected by the shutdown of the municipal adult education during the crisis since the final grades from the municipal adult education at upper secondary school level may be issued out until 1 July 2021. In the municipal adult education at upper secondary school level, the final grades are replaced by an upper secondary education qualification (*gymnasieexamen*). The transitional provisions have allowed the issuing of final grades according to the old rules until 1 July 2020, but due to current circumstances, the government has extended the transitional period. In many municipalities, t present it is not possible to get one's final grades from the municipal adult education since the final exams are cancelled due to covid-19.

On 26 April 2020, the government decided to allow schools to give online or distance education when the schools are open as usual, but pupils and teachers have to stay at home due to the recommendations of the Public Health Agency.²⁸ This can for example apply for pupils and teachers with mild symptoms of infectivity, who would otherwise have been in school. The principals and head principals who choose to use this possibility are responsible for organising the education in ways that is feasible both for teachers and pupils. Teachers cannot be expected to double their work by

²⁴ Sweden, Ministry of Education (*Utbildningsdepartementet*) Ordinance on amendments to the ordinance on education in certain types of schools in the education system upon the spread of certain infectivity (*Förordning om ändring i förordningen [2020:115] om utbildning på skolområdet och annan pedagogisk verksamhet vid spridning av viss smitta*), 24 april 2020, [available here](#)

²⁵ Sweden, Ordinance on education in certain types of schools in the education system upon spread of certain infectivity (*Förordning [2020:115] om utbildning i vissa skolformer i skolväsendet vid spridning av viss smitta*), section 2, 6 and 10, 6 April 2020, [available here](#)

²⁶ Sweden, Ministry of Education (*Utbildningsdepartementet*) (2020) Suggestion on distribution of positions to summer courses and competence-giving education (*Så här föreslås platser fördelas till sommarkurser och basår*) press release, 23 April 2020, [available here](#)

²⁷ Sweden, Ministry of Education (*Utbildningsdepartementet*) (2020) The possibility to issue final grades in the municipal adult education is prolonged with one year (*Möjligheten att utfärda slutbetyg i komvux förlängs ett år*), press release, 24 April 2020, [available here](#)

²⁸ Sweden, Ministry of Education (*Utbildningsdepartementet*) (2020), Increased possibilities for distance- or online education may facilitate for pupils and teachers (*Ökade möjligheter för fjärr- eller distansundervisning vid frånvaro kan underlätta för elever och lärare*), press release 26 April 2020, [available here](#)

simultaneously teach in school and online. Another possibility is to employ retired teachers that can offer distance education to pupils who must stay at home even when the schools are open.

The government decided to bring forward the next disbursement of the funding for the liberal adult education (*folkbildning*),²⁹ from the beginning of July to 5 May at the latest, in order to secure the liberal adult education's possibilities to conduct and strengthen their activities.³⁰ The government concluded that the folk high schools (*folkhögskolorna*) and the study associations (*studieförbunden*) have shouldered their responsibilities for decreasing the infectivity in society. Since the liberal adult education plays an important role in society the concerned actors must be able to handle their expenses given the new circumstances.

On 30 April 2020, the government assigned the Swedish National Agency for Education (*Skolverket*) the task to support head principals, principals, teachers, pre-school teachers and other personnel within education and other pedagogical activities in general, with the purpose to ease their workload and their working conditions.³¹ The personnel working within pre-schools and schools are under a lot of stress since they do not only have to guarantee the pupils' right to education, but also have to minimize the risks of spreading infectivity. In the current situation, it is important that the Swedish National Agency for Education can support the personnel by providing guidance on how to organise the education, so it works for all pupils but does not put unreasonable demands on the staff. The authority shall develop and spread learning examples, with support of the new decisions, recommendations and guidelines that the government and the Public Health Agency have developed due to covid-19. The assignment includes the development of a specific support focusing on how to facilitate certain parts of the education that are particularly difficult to perform during the pandemic, for example practical worklife orientation, trials, developmental talks. The assignment also includes the development of a support for the school healthcare's work, support for the work with newly arrived pupils, pupils studying at the introductory programmes or pupils in need of special support measures, for example because of the situations of their families or other social reasons, a disability, limited knowledge of the Swedish language, lack of computer skills or access to the necessary equipment for online studies. Furthermore, the authority will develop support for the school personnel on how to deal with the concerns and worries of their pupils relating to the current circumstances. All support material shall be in place already on 7 May and will be updated continuously according to demand.

²⁹ The specific term used is 'folkbildning'. The term is difficult to translate into English, sometimes translated as liberal or popular adult education. However, the specific conceptual foundation of 'folkbildning' extends beyond the term 'adult education'.

³⁰ Sweden, Ministry of Education (*Utbildningsdepartementet*) (2020) Funding to adult education is paid out earlier – folk high schools and adult educational associations receive money already in May (*Bidraget till folkbildningen betalas ut tidigare – folkhögskolor och studieförbund får pengar redan i maj*), press release, 23 April 2020, [available here](#)

³¹ Sweden, Ministry of Education (*Utbildningsdepartementet*) (2020) Support to facilitate the work situation in pre-schools and schools during the corona pandemy (*Stöd för att underlätta arbetssituationen i förskola och skola under coronapandemin*), press release, 30 April 2020, [available here](#)

The Minister of Education published an opinion piece (*debattartikel*), in which she praised the work of teachers and other caretakers of children at the same time as she asked the general public to lower its expectations on the schools during these special times.³²

1.2.2 Work

Focus on:

- *People in precarious work*

Measures related to 'essential workers' and those already returning to work, e.g. what is identified as an 'essential' function, physical distancing measures in the workplace, relaxing restrictions on working hours, additional financial support

On 1 April 2020, the government presented an extra amending budget to the parliament including a number of proposals targeting persons who are unemployed.³³ Among the temporary changes are changed membership condition for the unemployment benefits (*arbetslöshetsersättning*), reduction of the work condition, change of the minimum level for the basic amount and increase of the base amount. The extra amending budget also included proposals of an increase of the income-related compensation levels, a cancellation of certain qualifying conditions and facilitation of the entrepreneurs' possibilities to receive compensation for dormant companies. The parliament accepted the amending budget on 8 April and the temporary changes are valid from 13 April until the 3 January 2021.³⁴

On 15 April 2020, the government presented a spring amending budget (*vårändringsbudget*) to the parliament, which includes a number of proposals of measures for persons who have difficulties to enter the labour market.³⁵ For instance, the government proposes to allocate 150 million SEK (€14.1 million) to create green jobs in the nature and forest conservation. The Swedish Forest Agency (*Skogsstyrelsen*) will be assigned with the task of coordinating the measure together with the Swedish Environmental Protection Agency (*Naturvårdsverket*), the county administrative boards and the Geological Survey of Sweden (*Sveriges geologiska undersökning*). The aim is to employ persons who have difficulties to enter the labour market with subsidised employment to perform simpler tasks in primarily nature and forest conservation.³⁶ Furthermore, the government proposes that the maximum period for extra jobs, introductory job and new start-up job should be extended by 12 months for those

³² Sweden, Ministry of Education (*Utbildningsdepartementet*) (2020) We must lower the expectations on the school during the crisis (*Vi måste sänka förväntningarna på skolan under krisen*), debate article, 30 April 2020, [available here](#)

³³ Sweden, Ministry of Finance (*Finansdepartementet*) Extra amending budget for 2020 – Further measures in conjunction with the corona virus (*Extra ändringsbudget för 2020 – Ytterligare åtgärder med anledning av coronaviruset*), government bill, (*prop. 2019/20:146*), 1 april 2020, [available here](#)

³⁴ Sweden, Swedish Parliament, Finance Committee (*Riksdagen, Finansutskottet*) Extra amending budget for 2020 – Changes in the unemployment insurance and the study loans and other measures in conjunction with the corona virus (*Extra ändringsbudget för 2020 – Förändringar i arbetslöshetsförsäkringen och studiestödet samt andra åtgärder med anledning av coronaviruset*), committee report (*bet 2019/20:FiU56*), 8 April 2020, [available here](#)

³⁵ Sweden, Ministry of Finance (*Finansdepartementet*), Spring amending budget for 2020 (*Vårändringsbudget för 2020*), 15 April 2020, government bill (*Prop. 2019/20:99*), [available here](#)

³⁶ Sweden, Government Offices (*Regeringskansliet*), Green jobs important measure against unemployment during the corona crisis (*Gröna jobb viktig åtgärd mot arbetslöshet under coronakrisen*), [available here](#)

who already have such jobs in order to prevent a return to unemployment. The change means that persons, whose periods will expire, i.e. where the maximum period with support has been spent, can take advantage of support in the form of extra jobs, introductory jobs and new start-up jobs for another 12 months. In addition, the government also intends to extend the support for persons starting their own businesses from six months to twelve months in 2020.³⁷ In addition, the government proposes the allocation of 180 million SEK (€16.9 million) to be distributed to the municipalities to strengthen their opportunities to create summer jobs for youths. The grants that the municipalities receive for more summer jobs is aimed at young people who have finished compulsory school, youths who are studying at upper secondary level or who have finished their upper secondary education during 2020 and other young persons who are subject to municipal measures. Priority shall be given to young people who may otherwise have difficulties to find summer jobs on their own. The government proposes that the Public Employment Service shall be the responsible authority for distributing the funds/grants to the municipalities.³⁸ The parliament estimates that it will make its decision on 17 June 2020.³⁹

The Swedish Work Environment Authority (*Arbetsmiljöverket*) clarifies that there are special regulations concerning exemptions from the Working Hour Act⁴⁰ for public sector work of such nature and importance that it is impossible to refrain from breaking the rules on working hours.⁴¹ The exemptions are only valid in situations that differ from the normal circumstances for these types of activities. The authority highlights that these provisions already are in place and refers to a definition by the EU Court of Justice stating that this concerns positions and/or activities that are essential for sustaining the protection of security, health and public order under conditions of exceptional serious and comprehensive nature.⁴² A large outbreak of infectivity may constitute a situation where the exemption will be relevant, if the stress on the activities increases significantly, possibly in combination with unusually high numbers of sick leaves among the persons carrying out the activities in question. In such cases, the regulations on maximum total working hours, daily rest, working hours for night workers and compensation for temporary breaks of the week rest are not applicable. All this is regulated in the Working Hour Act.⁴³

³⁷ Sweden, Government Offices (*Regeringskansliet*), Extension of the maximum period for extra jobs, introduction jobs and new start jobs as well as support for starting businesses (*Maxtiden för extratjänster, introduktionsjobb och nystartsjobb samt stöd till start av näringsverksamhet förlängs*), [available here](#)

³⁸ Sweden, Government Offices (*Regeringskansliet*), 180 million allocated to summer jobs for youths during 2020 (*180 miljoner avsätts för sommarjobb till ungdomar 2020*), 23 april 2020, [available here](#)

³⁹ Sweden, Swedish Parliament, Finance Committee (*Riksdagen, Finansutskottet*), Spring amending budget for 202 (*Vårändringsbudget för 2020*), committee report (*bet 2019/20:FiU21*), [available here](#)

⁴⁰ Sweden, Working Hours Act (*Arbetstidslag [1982:673]*), section 3, third paragraph, 12 June 2014, [available here](#)

⁴¹ Sweden, Swedish Work Environment Authority (*Arbetsmiljöverket*), 2020, Systematic work environment work and risk assessment (*Systematiskt arbetsmiljöarbete och riskbedömning*), [available here](#)

⁴² Sweden, Swedish Work Environment Authority (*Arbetsmiljöverket*), 2020, Systematic work environment work and risk assessment (*Systematiskt arbetsmiljöarbete och riskbedömning*), [available here](#)

⁴³ Sweden, Working Hours Act (*Arbetstidslag [1982:673]*), section 3, third paragraph, 12 June 2014, [available here](#)

On 30 March 2020, the Government proposed to remove the income limit (*fribelopp*) for the rest of 2020. If a student exceed the income limit they have to pay back student grants and loans.⁴⁴ The change will encourage doctors, nurses and other persons in the healthcare sector who are studying, and persons who are studying to become healthcare professionals to work extra hours and relieve the burden of the healthcare workers where needed. By removing the threshold amount, students who want to work extra in the healthcare sector or in other socially important functions will not have to worry about any potentially negative effects on their student loans when they resume their studies.

On 3 April 2020, the Government decided on the details for measures concerning the social insurances in relation to the outbreak of the corona virus. The compensation for qualifying days (*karensdag*) and sick pay was established. The state temporarily compensates for the qualifying day which otherwise is not covered by the sick pay. The aim is to remove the incentive for persons to go to work when they are sick and assure that persons stay at home when they are sick. The employees will get compensated for the loss of income for the qualifying day by the Swedish Social Insurance Agency. The amount is 700 SEK (€65) and is the same for everyone. Furthermore, employers are compensated by the state for the sick pay costs they may have through April and May 2020.⁴⁵

On 7 April 2020, the Government has given the Work Environment Authority the task to ensure that there is a procedure in place that enables the approval of personal protective equipment that is not CE conformity marked, provided that the Work Environment Authority has concluded that the equipment ensures sufficient protection for health and safety. The assignment's background is the European Commission's recommendation of 13 March, that market control authorities under certain circumstances may allow personal protective equipment without CE-marking, if the authorities can ensure that the equipment provides an adequate protection of health and security.⁴⁶

The government has decided to change the national social fund programme. The change was done after an amendment in an EU regulation to enable the member states to reallocate up to 4 % of their programme budgets for programmes within the European Social Fund. The government decided on 16 April to reallocate an estimated 289 million SEK within the national ESF programme for measures to support persons in businesses at risk of lay-offs [varslade] or persons who are covered by short-term lay-offs. The measures shall aim at strengthening the individual's position in the labour market.⁴⁷

⁴⁴ Sweden, Ministry of Education (*Utbildningsdepartementet*) (2020) The threshold amount is abolished during 2020 so that more will be able to unburden the health care and other socially fundamental sectors (*Fribeloppet slopas under 2020 för att fler ska kunna avlasta vården och andra samhällsbärande sektorer*), press release, 30 March 2020, [available here](#)

⁴⁵ Sweden, Ministry of Health and Social Affairs (*Socialdepartementet*) (2020) Fixed amounts for sick pay insurance due to the corona virus (*Fastställda belopp för sjukförsäkringen till följd av coronaviruset*), press release, 3 April 2020, [available here](#)

⁴⁶ Sweden, Ministry of Employment (*Arbetsmarknadsdepartementet*) (2020) The Swedish Work Environment Authority shall contribute to securing the provision of protective equipment (*Arbetsmiljöverket ska bidra till att säkerställa tillgång till skyddsutrustning*), press release, 7 April 2020, [available here](#)

⁴⁷ Sweden, Ministry of Employment (*Arbetsmarknadsdepartementet*) (2020) 298 million SEK to measures for layoffs and permitted (*298 miljoner kronor till insatser för varslade och permitterade*), press release, 17 April 2020, [available here](#)

On 23 April 2020, the government decided to increase the possibilities for temporary parental allowance (*tillfällig föräldrapenning*) due to covid-19.⁴⁸ Parents who must stay at home from work to take care of their children at the event of a close-down of activities within the pre-schools or schools, shall be able to receive temporary parental allowance. The reimbursement will be about 90 percent of the compensation the parent would receive when they stay home from work with their sick child. This is clarified in an ordinance that entered into force on 25 April⁴⁹ and is applicable on the provisions on temporary parental allowance in chapter 13 of the Social Insurance Code (*Socialförsäkringsbalk [2010:110]*)⁵⁰. The ordinance ceases to be valid by the end of September 2020.

1.2.3 Access to justice

- *Restrictions to court proceedings (e.g. adjournment of proceedings, written procedures, extension of deadlines, determination of what constitutes ‘urgent cases’)*
- *Use of alternatives to detention*

Many courts cancel certain trials in order to prevent infectivity. These decisions are made by the individual courts. There is no information about which type of cases that are cancelled. The statistics of Sweden’s Court (*Sveriges Domstolar*) show that the percentage of cases that are cancelled are higher in conjunction with the corona crisis. The statistics differentiates between the different types of courts.⁵¹ The current statistics are presented in the table below.

⁴⁸ Sweden, Ministry of Health and Social Affairs (*Socialdepartementet*) (2020) Expanded possibilities for temporary parental allowance due to covid-19 (*Utvidgade möjligheter till tillfällig föräldrapenning med anledning av covid-19*), press release, 23 April 2020, [available here](#)

⁴⁹ Sweden, Ordinance on certain temporary parental allowance due to the disease covid-19 (*Förordning om viss tillfällig föräldrapenning med anledning av sjukdomen covid-19*), 24 April 2020, [available here](#)

⁵⁰ Sweden, Social Insurance Code (*Socialförsäkringsbalk [2010:110]*), 4 March 2010, [available here](#)

⁵¹ Sweden, Sweden’s Court (*Sveriges domstolar*) Statistics on the occasion of the Corona virus (*Statistik med anledning av coronaviruset*), [available here](#)

Percentage of cancelled hearings	
Average 2017–2019	
Administrative Court (<i>Förvaltningsrätt</i>)	16.3 %
Administrative Court of Appeal (<i>Kammarrätt</i>)	23.2 %
District Court (<i>Tingsrätt</i>)	21.4 %
Court of Appeal (<i>Hovrätt</i>)	15.7 %
30 March – 5 April 2020	
Administrative Court	18.6 %
Administrative Court of Appeal	11.6 %
District Court	34.9 %
Court of Appeal	20.3 %
6 April – 12 April 2020	
Administrative Court	15.4 %
Administrative Court of Appeal	30.8 %
District Court	30.6 %
Court of Appeal	21.7 %
13 April – 19 April 2020	
Administrative Court	17.6 %
Administrative Court of Appeal	18.8 %
District Court	32.1 %
Court of Appeal	22.5 %
20 April – 26 April 2020	
Administrative Court	21.4 %
Administrative Court of Appeal	38.2 %
District Court	30.5 %
Court of Appeal	22.7 %
27 April – 3 May 2020	
Administrative Court	17.4 %
Administrative Court of Appeal	38.9 %
District Court	30.1 %
Court of Appeal	30.4 %

The different courts publish their own information about the corona virus together with any specific rules of conduct. The court-specific information is available at the Swedish Courts' webpage.⁵²

Preliminary figures from the Swedish National Courts Administration (*Domstolsverket*) show that 33 % of the hearings were cancelled in week 17, to compare with an average of around 20 % of the hearings before covid-19.⁵³ Despite the cancellations, the Swedish courts continue to settle cases with the help of the information and communication technology. New figures show a large increase in the use of videos in the court hearings. The increase took off in week 12. In the following weeks, the numbers of video meetings have continued to increase, with the exemption of week 15, during the Easter vacation. During weeks 16 and 17, the increase has been 141 respectively 155 % compared to the same weeks in 2019. The technical manager at the Swedish National Courts Administration says that there are no technical limitations hindering parties to participate in the hearings at distance. However, the decisions to use videos etc. are made by the judges in the individual cases.

Visits to inmates in remand prisons and prisons remain prohibited. Inmates can only accept visits from symptom-free persons who visit the inmates in their profession or by request of the Prison and Probation Service. No other visits are allowed. Probations that are not necessary are not allowed.

⁵² Sweden, Swedish Courts (*Sveriges Domstolar*), 2020, Corona virus, [available here](#)

⁵³ Sweden, Swedish Courts (*Sveriges Domstolar*) (2020) Sharp increase in the courts' usage of video techniques (*Kraftig ökning av domstolarnas användning av videoteknik*), press release, 29 April 2020, [available here](#)

Phone calls within Sweden are temporarily free of charge and will continue to be free for inmates in remand prisons and prisons. The cost of international phone calls is reduced with 50 %. The decision, which is valid from 20 April until 19 May 2020, was made to compensate for ban of visits and leaves (*permission*) introduced in the Swedish Prison and Probation Service as a result of the corona virus.⁵⁴

1.2.4 Freedom of movement

Focus on:

- *Closure of borders/restrictions on movement within the EU and categories of people allowed to enter the Member State (including EU citizens, legally-residing third country nationals and their families, asylum applicants)*
- *Special provisions for cross-border commuters (especially health and care workers) or other workers from neighbouring non-EU countries*

On 16 April 2020, the government decided to extend the entry ban on non-essential travels to the EU, as recommended by the European Commission.⁵⁵ Sweden follows the Commission's guidelines concerning the entry ban as well as the list of exceptions defined by the Commission. Persons who have temporary or permanent residence permits in Sweden are also exempted from the entry ban if the purpose of their entry is to return home. Exceptions are also made for people with an essential function or need.⁵⁶

On 24 March 2020, the government decided to allocate 10 million SEK (€900,000) to the resources for consular assistance. The decision is based on the assessment that the need for consular assistance to Swedes who are abroad will increase, as many Swedes are currently in countries with closed borders and without commercial flights to and from their territories.⁵⁷

On 3 April 2020, the Ministry of Foreign Affairs decided to extend its advice against non-necessary travels to all countries, which was first decided on 14 March. The advice will be valid until 15 June 2020, after which a new assessment will be made.⁵⁸

⁵⁴ Sweden, Swedish Prison and Probation Service (*Kriminalvården*) (2020) New decision on detainee's telephone (*Nytt beslut om intagnas telefoni*), 17 April 2020, [available here](#)

⁵⁵ Sweden, Ministry of Justice (*Justitiedepartementet*) (2020) Prolongation of temporary entry ban to the EU via Sweden due to covid-19 (*Förlängning av tillfälligt inreseförbud till EU via Sverige med anledning av covid-19*), press release, 16 April 2020, [available here](#)

⁵⁶ Sweden, Ministry of Justice (*Justitiedepartementet*) (2020) Q and A – temporary entry ban to the EU via Sweden (*Frågor och svar – tillfälligt inreseförbud till EU via Sverige*), 16 April 2020, [available here](#)

⁵⁷ Sweden, Ministry of Foreign Affairs (*Utrikesdepartementet*) (2020) 10 million SEK extra to consular assistance (*10 miljoner kr extra till konsulärt bistånd*), 25 March 2020, [available here](#)

⁵⁸ Sweden, Ministry of Foreign Affairs (*Utrikesdepartementet*) (2020) Travels abroad – extended advise against non-necessary travels to all countries (*Utlandsresor – förlängd avrådan från icke nödvändiga resor till alla länder*), press release, 3 April 2020, [available here](#)

1.3 Impact of measures on particular groups

Select the three most relevant groups from the following:

- persons with disabilities,
- homeless people,
- older people (which should include older persons in institutions),
- Roma and Travellers (FRA would like to see this group covered in those Member States with significant Roma populations)
- detainees
- or another group not listed that have emerged in your country as facing particular challenges - before selection, this should be discussed with FRA.

Persons in risk of being victims of violence

On 1 April 2020, the government proposed to allocate 100 million SEK (€9.2 million) to civil society organisations working with children and young persons in vulnerable situations, violence in close relationships and women, children and LGBTQ-persons, who are exposed to violence.⁵⁹ The proposal was part of the government's fifth amending budget. The financial support focused on groups likely to find themselves in especially difficult circumstances because of the changes brought on by the new virus, for example because they cannot go to work or school or because they have to isolate in their homes.⁶⁰ Many civil society organisations have raised their concerns about the increased risk of violence against women brought on by the crisis. The National Organisation for Women's Shelters and Young Women's Shelters in Sweden (*Riksorganisationen för kvinnojourer och tjejjourer i Sverige, Roks*) states that the current situation with quarantine, unemployment and home-based workdays means that many women are confined to their homes with men who repress them and expose them to violence.⁶¹ According to Unizon, a civil society organisation supporting abused women, its member organisations' hotlines are working day and night to be available for these women also when parts of the public sector's service and support shut down.⁶² However, the National centre for knowledge about men's violence against women (Nationellt center för kvinnofrid), the number of calls to the national helpline supporting abused women has not increased as of 30 April 2020.⁶³

⁵⁹ Sweden, Ministry of Employment (*Arbetsmarknadsdepartementet*) (2020), Measure to meet increased vulnerability in connection to the new corona virus (*Satsning för att möta ökad utsatthet i samband med det nya coronaviruset*), press release, 1 April 2020, [available here](#)

⁶⁰ Sweden, Ministry of Employment (*Arbetsmarknadsdepartementet*) (2020), Measure to meet increased vulnerability in connection to the new corona virus (*Satsning för att möta ökad utsatthet i samband med det nya coronaviruset*), press release, 1 April 2020, [available here](#)

⁶¹ Sweden, National Organisation for Women's Shelters and Young Women's Shelters in Sweden (*Riksorganisationen för kvinnojourer och tjejjourer i Sverige, Roks*). Roks welcomes 100 million to abused women and children and advocates for change (*Roks välkomnar 100 miljoner till våldsutsatta kvinnor och barn och förordar en förändring*), webpage, 1 April 2020, [available here](#)

⁶² Sweden, Unizon, Unizon: the government's extra 100 million a matter of life and death for the risk group women and children (*Regeringens 100 extra miljoner är livsavgörande för riskgruppen kvinnor och barn*), webpage, 1 April 2020, [available here](#)

⁶³ Sweden, Uppsala University (*Uppsala universitet*) National centre for knowledge about men's violence against women (Nationellt center för kvinnofrid), The work of the authorities (Myndigheternas arbete), webpage, 30 April 2020, [available here](#)

The increased risks for violence during the corona crisis have also been raised by the Swedish Federation for Lesbian, Gay, Bisexual, Transgender, Queer and Intersex Rights, that describes how the crisis affects the LGBTQ-community in this regard.⁶⁴ People who have come to Sweden as LGBTQI refugees may have their lives put on hold because of cancelled asylum interviews, regulations against social gatherings, and a lack of relief efforts. Furthermore, access to healthcare is limited and gender-affirming surgery is postponed. Elderly LGBTQI people with a limited social network are considered to be especially vulnerable. They may not have children or other family members that can do their shopping or care for them, which increases the risk of loneliness and isolation. Many youths and adults are forced to isolate themselves with family members who might not be supportive of them or understand their situation. The civil society organisation TRIS (*Tjejers rätt i samhället*), working against honour-related crimes and oppression also stresses the potential risk that the isolation caused by the corona virus will lead to an increase in forced marriages since there is nowhere to turn for the children at risk.⁶⁵ According to the organisation, an increasing proportion of the calls to the organisation's support line concerns the worry and fear young persons experience when they are trapped at home and unable to seek help and protection.⁶⁶ They youths are subjected to strong family pressure to marry and find themselves in a loyalty conflict between the wish to resist non-self-elected marriages and the desire to do the right thing and refrain from hurting relatives now when everyone is having a hard time because of the Corona crisis. Several calls from the target group and from professionals working with the group indicate an increased risk of child marriages and forced marriages as a result of families and relatives worrying about the risk of the death of elderly significant family members from the corona virus. A way to honour them at the end of their lives are to allow them to choose suitable partners for their grandchildren or nieces/nephews.⁶⁷

On 14 April 2020, the government commissioned the National Board of Health and Welfare (*Socialstyrelsen*) to identify groups that run the highest risk of a particularly serious disease progression (*sjukdomsförlopp*) if they fall ill with covid-19, since these groups may be in special need of protection against infectivity.⁶⁸ The National Board of Health and Welfare should define the number of persons within the larger groups of persons of working age under 67 years, pregnant persons and children (including their parents), who should be considered to be high risk persons. These persons may temporarily have to abstain from work outside the home to be protected against infectivity and will consequently be in need of economic compensation if they do not have the possibility to work from home. The assignment should be carried out in consultation with the Public Health Agency (*Folkhälsomyndigheten*).

⁶⁴ Sweden, Swedish Federation for Lesbian, Gay, Bisexual, Transgender, Queer and Intersex Rights (*Riksförbundet för homosexuella, bisexuella, transpersoner, queeras och intersexpersoners rättigheter*), 2020, RFSL needs your help (*RFSL behöver din hjälp*), webpage, [available here](#)

⁶⁵ Sweden, 'TRIS: An effect of corona is that more children risk being forced into marriages' (*TRIS: Effekt av corona att fler barn riskerar att giftas bort*), in *Aftonbladet*, newspaper editorial, 6 April 2020, [available here](#)

⁶⁶ Sweden, Girls' rights in society (*Tjejers rätt i samhället, TRIS*), The effect of the corona virus favours honour-related practices (*Effekten av corona underlättar hedersrelaterade praktiker*), 29 April 2020, [available here](#)

⁶⁷ Sweden, Girls' rights in society (*Tjejers rätt i samhället, TRIS*), The effect of the corona virus favours honour-related practices (*Effekten av corona underlättar hedersrelaterade praktiker*), 29 April 2020, [available here](#)

⁶⁸ Sweden, Ministry of Health and Social Affairs (*Socialdepartementet*) (2020) Assignment to identify the groups of individuals who run the greatest risk of a particularly serious disease progression if falling ill with covid-19 (*Uppdrag att identifiera de grupper av individer som löper störst risk att drabbas av ett särskilt allvarligt sjukdomsförlopp vid insjuknande i covid-19*), Government Assignment, 15 April 2020, [available here](#)

The National Board of Health and Welfare (*Socialstyrelsen*) presented its assignment to the government on 17 April 2020.⁶⁹ The authority defines eight risk groups: 1) persons aged 70 years and over; 2) persons with an active cancer disease; 3) persons with ongoing or recently completed treatment for cancer (excluding hormonal adjuvant therapy); 4) persons with concomitant occurrence of more than one of the diagnoses of cardiovascular disease (angina, heart failure, stroke), hypertension, diabetes with complications, chronic kidney disease and kidney failure, chronic lung disease (other than asthma) or chronic liver disease; 5) obese persons (BMI 40 and above); 6) persons with neuromuscular diseases (ex. Parkinson, MS, ALS); 7) persons with intellectual impairment and disability (multifunctional disability); and 8) persons with other serious health conditions leading to an increased susceptibility to Sars-CoV-2 and risk of serious disease progression when falling ill with covid-19.⁷⁰ According to the National Board of Health and Welfare, it is only possible to give a rough estimate of the number of persons in Sweden that are included in any risk group according to the diagnosis list above. The estimate is based on the number of unique individuals of working age who, during the past year, have had contact with specialised outpatient care or with inpatient care at hospitals per diagnosis and the number of children who are granted personal assistance. Based on the National Board of Health's proposed list of risk groups, the authority estimates that the number of persons affected will amount to approximately 200,000. In order to prove that they do belong to any of the specified risk groups, some form of medical evidence will be necessary when applying for compensation.⁷¹

On 14 April 2020, the Minister of Foreign Affairs published an opinion piece together with the vice president for UN Women in which she argues that women are extra afflicted by the ongoing corona crisis. Consequently, all measures taken to combat covid-19 globally must be have a clear gender equality perspective.⁷² According to the opinion piece, women are extra vulnerable in three areas where measures for women and girls' rights must be strengthened: 1) men's violence against women – experience shows that violence in close relationships is increasing in crises and disasters. The situation worsens if women's shelters and hotlines are closed or reduced. The need for support will increase after the crisis; 2) health – women make up 70 % of the employees in the healthcare and social sectors globally and take the main responsibility for housework, which includes caring for infected family members. In addition, a majority of the world's elderly population are women. In previous health crises, sexual and reproductive health and rights to maternal care, contraception and safe abortion have been downprioritised when limited resources are reallocated; and 3) economy and inclusion – globally, women have poorer personal finances and have more vulnerable positions in the labour market than men. Women are also to a greater extent single parents. Therefore, the economic

⁶⁹ Sweden, National Board of Health and Welfare (*Socialstyrelsen*) Identification of risk groups that runs the highest risk of a particularly serious disease progression if they fall ill with covid-19 (*Identifiering av riskgrupper som löper störst risk att drabbas av ett särskilt allvarligt sjukdomsförlopp vid insjuknande i covid-19*), Registration number 5.7-13632/2020, 17 April 2020, [available here](#)

⁷⁰ Sweden, National Board of Health and Welfare (*Socialstyrelsen*) Identification of risk groups that runs the highest risk of a particularly serious disease progression if they fall ill with covid-19 (*Identifiering av riskgrupper som löper störst risk att drabbas av ett särskilt allvarligt sjukdomsförlopp vid insjuknande i covid-19*), Registration number 5.7-13632/2020, 17 April 2020, [available here](#)

⁷¹ Sweden, National Board of Health and Welfare (*Socialstyrelsen*) Identification of risk groups that runs the highest risk of a particularly serious disease progression if they fall ill with covid-19 (*Identifiering av riskgrupper som löper störst risk att drabbas av ett särskilt allvarligt sjukdomsförlopp vid insjuknande i covid-19*), Registration number 5.7-13632/2020, 17 April 2020, [available here](#)

⁷² Sweden, Ministry of Foreign Affairs (*Utrikesdepartementet*) (2020), Women are extra hard hit by the corona crisis (*Kvinnor drabbas extra hårt av coronakrisen*), opinion piece, 14 April 2020, [available here](#)

downturn following the corona crisis is likely to strike women harder than men. Financial measures against the effects of the crisis need to consider the specific situation of women.⁷³

On 18 April 2020, the government assigned the Legal, Financial and Administrative Services Agency (*Kammarkollegiet*) to distribute 24 million SEK (€2.2 million) to the regions to support the development and strengthening of digital channels of communication aimed at treating and supporting patients with poor mental health. The government's aim is to subsidise functional channels of communication between the patients in question, their relatives and the healthcare sector in situations where physical meetings are not possible due to the spread of covid-19.⁷⁴

On 30 April 2020, the government commissioned the Swedish Gender Equality Agency (*Jämställdhetsmyndigheten*) to identify and develop efficient work methods for municipalities in order to disseminate information about violence in close relationships and honour-related violence and oppression and get in touch with any victims of violence.⁷⁵ The Swedish Gender Equality Agency shall also disseminate the developed work methods to the municipalities. The assignment shall be based on the special circumstances and conditions brought on by the outbreak of covid-19.

Persons born abroad, living in socio-economically challenged areas

On 27 March 2020, the government invited civil society organisations in socio-economically challenged areas to a digital meeting about how Covid-19 affects persons living in these areas.⁷⁶ It has been found that a disproportional number of persons in socio-economically challenged areas have been severely afflicted by covid-19, and the government wished to get an overview of measures carried out by civil society organisations in these areas. The government also wished to get further information from the organisations concerning any needs brought about by the current situation.

Statistics show that persons born abroad are overrepresented among the persons infected with covid-19 as well as persons who have died of the virus. Particularly persons born in Somalia and Iraq are disproportionately affected.⁷⁷ The state epidemiologist (*statsepidemiologen*) stated these facts at the daily press conference on 14 April.⁷⁸ The statistics are based on the cases that have come

⁷³ Sweden, Ministry of Foreign Affairs (*Utrikesdepartementet*) (2020), Women are extra hard hit by the corona crisis (*Kvinnor drabbas extra hårt av coronakrisen*), opinion piece, 14 April 2020, [available here](#)

⁷⁴ Sweden, Ministry of Health and Social Affairs (*Socialdepartementet*), Ministry of Environment (*Miljödepartementet*) (2020) Increased digital channels of communication to safeguard mental health (*Utökade digitala kontaktvägar för att värna psykisk hälsa*), press release, 18 April 2020, [available here](#)

⁷⁵ Sweden, Ministry of Employment (*Arbetsmarknadsdepartementet*) (2020) Assignment to the Swedish Gender Equality Agency to identify and develop work procedures for municipalities to spread information about violence in close relationships and honour related violence and oppression due to the outbreak of covid-19 (*Uppdrag till Jämställdhetsmyndigheten att identifiera och utveckla arbetsätt för att kommuner ska kunna sprida information om våld i nära relationer och hedersrelaterat våld och förtryck med anledning av utbrottet av covid-19*), Government Assignment, 30 April 2020, [available here](#)

⁷⁶ Sweden, Ministry of Employment (*Arbetsmarknadsdepartementet*) (2020), Åsa Lindhagen meets civil society in socio-economically challenged areas (*Åsa Lindhagen träffar civilsamhället i områden med socioekonomiska utmaningar*), press release, 27 March 2020, [available here](#)

⁷⁷ Sweden, 'Persons born abroad overrepresented among the infected' (*Utlandsfödda är överrepresenterade bland de smittade*), in *Läkartidningen*, newspaper editorial, 14 April 2020, [available here](#)

⁷⁸ Sweden, Public Health Agency (*Folkhälsomyndigheten*), 2020, Press conference on covid-19 (corona virus) 14 April 2020, (*Pressträff om covid-19 [coronavirus] 14 april 2020*), [available here](#)

to the healthcare sector for medical services in relation to the corona virus. The state epidemiologist stated that the statistics highlight the importance of directing measures towards these groups. The data was also presented in the Public Health Agency's weekly report on 17 April 2020 and can be found in the table below.

Percentage of cases and percentage of the population for countries of origins with the highest number of cases ⁷⁹		
Country of birth	Percentage of the population	Percentage of the deaths in covid-19
Somalia	1.75	4.8
Iraq	1.3	4.1
Syria	1.8	3.25
Finland	1.3	3.1
Turkey	0.5	2.5
Iran	0.8	1.3
Yugoslavia	0.6	1
Eritrea	0.5	0.9

The effects socio-economic background and other factors have on infectivity will be presented by the Public Health Agency after an analysis of further data requested from Statistics Sweden (*Statistiska centralbyrån, SCB*). Statistics also show that persons living in the socio-economically challenged area Järva in the outskirts of Stockholm have been most afflicted by the virus in the Stockholm region.⁸⁰ The Järva area is the geographical name for two city districts – Rinkeby-Kista and Spånga-Tensta. It is interesting to note that these two city districts have a larger proportion of inhabitants with foreign background (born abroad or with two parents born abroad) than the city as a whole. 83 % of the inhabitants of Rinkeby-Kista and 60 % of the inhabitants of Tensta-Spånga are of foreign background. 33 % of the population of Stockholm City are of foreign background. The cumulative number of deaths per 10,000 inhabitants for Stockholm City and the two city districts are shown below.

City/city district	Cumulative number of deaths per 10,000 inhabitants ⁸¹
Stockholm stad	6.6
Rinkeby-Kista	14.3
Spånga-Tensta	10.9

⁷⁹ Sweden, Public Health Agency (*Folhälsomyndigheten*), Weekly report about covid-19, week 15 (*Veckorapport om covid-19, vecka 15*), 17 April 2020, [available here](#) Please note that the decimals may not be exact since the authority presented the data in a bar chart only showing whole numbers.

⁸⁰ Sweden, '382 confirmed cases – Järva hardest hit by corona' (*382 bekräftade fall – Järva har drabbats hårdast av corona*), in *Mitt i Stockholm*, newspaper editorial, 7 April 2020, [available here](#)

⁸¹ Sweden, Region Stockholm, Number of infected and deceased with covid-19 per city and city district (Antal smittade och avlidna med covid-19 per kommun och stadsdel, 5 May 2020, [available here](#)

Persons living in this area have demanded extraordinary crisis measures, which was shown in an opinion piece on 15 April.⁸² For example, a group should be established that coordinates the different socio-economic measures and activities, assesses the scope of the pandemic, and acts accordingly. This coordinating group is suggested to have its own budget, work under the responsible local politicians together with other civil society actors. A probable reason for the overrepresentation of illness in socio-economic vulnerable areas commonly mentioned in the debate is the fact that persons in these areas generally live in overcrowded households, and typically have jobs that are impossible to perform from home. This hypothesis has been debated in several newspapers as exemplified below. For example, representatives of the Left Party have stated that overcrowding is a class-based concern, and that the development of covid-19 in overcrowded areas stresses the need for an increase of the availability of affordable rental flats.⁸³ However, new statistics from Statistics Sweden (*Statistiska Centralbyrån, SCB*) show that overcrowding increases in Sweden, and that the overcrowding varies substantially between groups.⁸⁴ Among persons born outside of Europe, around 23 % live in overcrowded conditions. Among the general group of persons born abroad, 16 % live in overcrowded conditions and only 2 % of persons born in Sweden live in overcrowded conditions.⁸⁵ Another example of this debate was presented by the party leader for the Christian Democrats (*Kristdemokraterna*) in an opinion piece⁸⁶ in which she stated that it was time to be frank about the cultural differences she considered to be the underlying factors for the overrepresentation of covid-19 among persons with Somali descent. The article has been criticised by politicians representing the Social Democrats (*Socialdemokraterna*) for lacking solidarity with the afflicted persons,⁸⁷ and by the National Somali Association (*Somaliska riksförbundet*) for placing blame on the ethnicity of a special group rather than their socio-economic circumstances.⁸⁸ The responses were met by the party leader of the Christian Democrats, who stated that she was devastated by the disproportional figures and only wished to raise awareness and bring about action against this negative development.⁸⁹ Thereafter, the information about covid-19 has been available in a variety of languages.⁹⁰ Another example is information from The Swedish Agency for Support for Faith Communities where a number of religious leaders are providing information in various

⁸² Sweden, 'Corona in Järva demands extra crisis measures' (*Corona i Järva kräver extra krisåtgärder*) in *Aftonbladet*, opinion piece, 15 April 2020, [available here](#)

⁸³ Sweden, 'Corona shows that overcrowding is life-threatening' (*Corona visar att det är livsfarligt att bo trångt*) in *Aftonbladet*, opinion piece, 11 April 2020, [available here](#)

⁸⁴ Sweden, Statistics Sweden (*Statistiska Centralbyrån, SCB*) (2020) Surveys of living standards (*Undersökningarna av levnadsförhållanden*), 21 April 2020, [available here](#)

⁸⁵ Sweden, Statistics Sweden (*Statistiska Centralbyrån, SCB*) (2020) Surveys of living standards (*Undersökningarna av levnadsförhållanden*), 21 April 2020, [available here](#)

⁸⁶ Sweden, 'Let us be clear about corona and the city outskirts' (*Våga tala klarspråk om corona och förorten*) in *Aftonbladet*, 2 April 2020, opinion piece, [available here](#)

⁸⁷ Sweden, 'KD, show solidarity with the afflicted in Järva' (*KD, visa solidaritet med drabbade i Järva*), in *Aftonbladet*, 3 April 2020, opinion piece, [available here](#)

⁸⁸ Sweden, 'XX XX, let us be clear now' (*XX XX, låt oss tala klarspråk nu*) in *Aftonbladet*, 3 April 2020, opinion piece, [available here](#)

⁸⁹ Sweden 'We need to know if certain groups are more vulnerable' (*Vi behöver veta om grupper är mer utsatta*) in *Aftonbladet*, 3 April 2020, opinion piece, [available here](#)

⁹⁰ See more at <https://www.krisinformation.se/detta-kan-handa/handelser-och-storningar/20192/myndigheterna-om-det-nya-coronaviruset/andra-sprakother-languages>. The Public Health Agency of Sweden <https://www.folkhalsomyndigheten.se/smittskydd-beredskap/utbrott/aktuella-utbrott/covid-19/skydda-dig-och-andra/information-pa-olika-sprak/engelska/>

languages.⁹¹ However, the official information available in Somali has been criticised by the only authorised translator from Somali and Swedish as being poorly and sloppy translated.⁹²

Elderly persons

On 1 April 2020, the Public Health Agency introduced a number of regulations and general advice (*föreskrifter och allmänna råd*) clarifying different actors' responsibility to prevent the infectivity of covid-19. The regulations apply until 31 December 2020 but may be suspended before then or beyond this date. Among these regulations and general advice, the authority strongly advises persons over 70 years and persons included in other risk groups to limit their physical contact with others and altogether avoid public transport. Persons over 70 must also avoid going to shops and other places where people gather.⁹³ According to the state epidemiologist, Sweden has had an unfortunate development of the infectivity in the nursing homes for elderly persons (*äldreboende*), in comparison with the other Nordic countries.⁹⁴ Almost 50 % of the deaths in covid-19 are persons over 70 living in such nursing homes.⁹⁵ This development has been subject of serious discussions and criticism. 22 scientists published an opinion piece in which they criticised the Public Health Agency and demanded stricter restrictions.⁹⁶ The situation for elderly persons was referred to as follows: "If there would have been a developed, well-functioning strategy, half the nursing homes in Stockholm would not have been infected with the epidemic [...]"⁹⁷

90 % of the persons who have died of covid-19 have been 70 years or older. Over 50 % of all deaths have occurred in the Stockholm region. The statistics are based on a compilation of around 1,700 death certificates.⁹⁸

The National Board of Health and Welfare has published a supporting material on working methods in times of covid-19 for care of persons with dementia living in special housing forms for elderly persons.⁹⁹ The material aims to guide and support professionals caring for such persons on how to adjust their

⁹¹ <https://www.myndigheten.se/om-oss/nyheter/nyhetsarkiv-aktuellt/2020-04-01-trossamfundsledare-talar-om-covid-19.html>

⁹² Sweden, 'Beyond belief that the corona advice in Somali contains errors and sloppy mistakes' (*Obegripligt att corona-råden på somaliska innehåller fel och slarv*), in *Aftonbladet*, newspaper column, 23 April 2020, [available here](#)

⁹³ Sweden, Public Health Agency (*Folkhälsomyndigheten*) (2020) New general advice: Keep distance and take personal responsibility (*Nya allmänna råd: Håll avstånd och ta personligt ansvar*), 1 April 2020, [available here](#)

⁹⁴ Sweden, Public Health Agency (*Folkhälsomyndigheten*), 2020, Press conference on covid-19 (corona virus) 14 April 2020, (*Pressträff om covid-19 [coronavirus] 14 april 2020*), [available here](#)

⁹⁵ Sweden, Public Health Agency (*Folkhälsomyndigheten*), 2020, Press conference on covid-19 (corona virus) 14 April 2020, (*Pressträff om covid-19 [coronavirus] 14 april 2020*), [available here](#)

⁹⁶ Sweden, 'The Public Health Agency has failed – the politicians must intervene' (*Folkhälsomyndigheten har misslyckats – nu måste politikerna gripa in*) in *Dagens Nyheter*, opinion piece, 14 April 2020, [available here](#)

⁹⁷ In Swedish: "Om det funnits en utarbetad, väl fungerande strategi skulle inte hälften av Stockholms äldreboenden ha drabbats av epidemin"

⁹⁸ Sweden, National Board of Health and Welfare (*Socialstyrelsen*), 2020, The highest proportion of the certificates of cause of death over deceased in covid-19 is found in Stockholm (*Dödsorsaksintyg över avlidna i covid-19 visar högst andel i Stockholm*), 27 April 2020, [available here](#)

⁹⁹ Sweden, National Board of Health and Welfare (*Socialstyrelsen*) (2020) Support material for staff at nursing homes for elderly persons with dementia (*Stöd för personal på boende för äldre med demenssjukdom*), 28 April 2020, [available here](#)

care when persons with dementia are infected with the corona virus.¹⁰⁰ The guide is based in the general procedures for preventing negative behavioural and mental symptoms of dementia. These procedures are then adapted to the current situation with the covid-19 pandemic. The specific advice on change in working methods due to covid-19 concern such things as preparing persons with dementia before initiating certain care or treatment e.g. when the staff wear protective equipment take samples, supporting them in washing hands, cleaning nails and other hygiene measures, Other advice focus on creating opportunities for activity to reduce anxiety and enabling contact with relatives via telephone or digital devices, something which can be especially important in order to be able to help people who (no longer) speak Swedish.¹⁰¹

2 Users' data – privacy and data protection

2.1 Arrangements between public authorities and other actors to allow collection, sharing and processing of user data

As of 8 April 2020, the Public Health Agency uses mobile data to analyse how people move around in Sweden in with the corona pandemic.¹⁰² The authority accesses the information from the operator Telia by collecting anonymised and aggregated data from Telia's mobile phone net for Swedish customers. The intention is to use the information to study how the movement patterns can be connected to the spread of covid-19 in Sweden. The information may also be used as basis for decisions of potential measures, and the evaluation of the effects of other measures, such as the recommendations about social distancing and refraining from unnecessary travels. The Public Health Agency states that the authority has an agreement with Telia that clarifies that the data collection does not give the authority access to personal data or any information that may identify individuals, e.g. location data.¹⁰³

On 30 April 2020, researchers at Lund University stated that they are launching an app developed in the UK that will map the spread of covid-19 by following private persons reporting their symptoms into the app.¹⁰⁴ As mentioned below, the Public Health Agency just paused a similar project out of concern about its risks. The app launched by the researchers, *Covid symptom study*, is free of charge and can be downloaded to many different types of telephones. The COVID Symptom Study app is based on the collection of the self-reported data from individual concerning their health status. The app was first

¹⁰⁰ Sweden, National Board of Health and Welfare (*Socialstyrelsen*) (2020) Support material for staff at nursing homes for elderly persons with dementia (*Stöd för personal på boende för äldre med demenssjukdom*), 28 April 2020, [available here](#)

¹⁰¹ Sweden, National Board of Health and Welfare (*Socialstyrelsen*) (2020) Support material for staff at nursing homes for elderly persons with dementia (*Stöd för personal på boende för äldre med demenssjukdom*), 28 April 2020, [available here](#)

¹⁰² Sweden, Public Health Agency (*Folkhälsomyndigheten*) (2020) Public Health Agency takes help from mobile data (*Folkhälsomyndigheten tar hjälp av mobildata*), 8 April 2020, [available here](#)

¹⁰³ Sweden, Public Health Agency (*Folkhälsomyndigheten*), Data collected in writing through e-mail correspondence, 30 April 2020

¹⁰⁴ Sweden, 'Lund University invests in British app for infectivity tracing' (*Lunds Universitet satsar på brittisk app för smittspridning*) in *Läkartidningen*, news paper editorial, 30 April 2020, [available here](#)

called the COVID Symptom Tracker but changed name to emphasise that the app is not tracking persons with the use of Bluetooth technology or GPS. The app was launched in the UK on 24 March 2020 and is owned by Zoe Global Ltd. The data collected in Sweden will be used in a research project at Lund University. The data collection will continue as long as the SARS-CoV-2 virus, which causes covid-19, spreads in Sweden. Zoe Global Ltd is responsible for the data collection from users in Sweden and for the data collection in the UK. Lund University leads the Swedish research and is responsible for the data sent from Zoe Global Ltd in London to Lund University. The data will be retained at Lund University for at least ten years after it has been collected in accordance with applicable data protection legislation. According to Lund University, all data storage and transmission in Sweden and in the UK meets the requirements of the EU Data Protection Regulation 2016/679, also called the General Data Protection Regulation (GDPR), and other relevant legislation¹⁰⁵.

2.2 Legal framework enabling collection, processing, sharing and storage of user data

The access to mobile data is regulated in accordance with the General Data Protection Regulation,¹⁰⁶ and the complementary national legislation.¹⁰⁷ Ultimately, the data collection depends on the consumers' approval.¹⁰⁸

2.3 Privacy and data protection concerns and possible solutions

The Swedish Data Protection Authority (*Datainspektionen*) states that if the authorities must use personal data to protect Sweden from the spread of the corona virus it is important that adequate procedures are in place that minimise any breaches of integrity that, for example, ensure that the collected data is erased immediately after the end of the outbreak, guarantee that the data is not used for any other purposes, and limit the persons who have access to the data to an absolute minimum. The Data Protection Authority points out that the parliament may have to assure that the legislation requires this kind of routines. If private actors develop apps for the digital tracing of infectivity by collecting location data from networks or telephones, the approval of the individuals in question is necessary.¹⁰⁹

The Swedish Data Protection Authority (*Datainspektionen*) addressed the usage of services and apps tracing infectivity via localisation of information from the mobile networks or apps as follows. The authority states that any requests on pre-consultations from actors working with digital tracing of

¹⁰⁵ Sweden, Lund University (*Lunds universitet*) New calculations: 1.5–3.5 percent of Sweden's population have symptoms that are consistent with an ongoing symptomatic covid-19 infection (*Nya beräkningar: 1,5 – 3,5 procent av Sveriges befolkning har just nu symptom som överensstämmer med en pågående symptomatiskt covid-19-infektion*), 7 May 2020, [available here](#)

¹⁰⁶ Sweden, Swedish Data Protection Authority (*Datainspektionen*), 2020, Data Protection Ordinance (*Dataskyddsförordningen*), [available here](#)

¹⁰⁷ Sweden, Act on Complementary Regulations to the EU Data Protection Regulation (*Lag [2018:218] med kompletterande bestämmelser till EU:s dataskyddsförordning*), 1 January 2019, [available here](#)

¹⁰⁸ Sweden, Telia, 2020, On your terms (*På dina villkor*), webpage, [available here](#)

¹⁰⁹ Sweden, Swedish Data Protection Authority (*Datainspektionen*), The corona virus and digital tracing of infectivity (*Coronaviruset och digital smittspårning*), 2020, [available here](#)

infectivity requiring the collection of personal data will be prioritised. However, as of 29 April, the authority has not received any requests of this kind.¹¹⁰

The Swedish Civil Contingencies Agency (*Myndigheten för samhällsskydd och beredskap*) was developing a digital tool to trace the spread of covid-19. However, this work is now paused. According to the state epidemiologist, the tool in question might do more harm than good. The envisaged service was supposed to map Swedes who experience symptoms and follow their behaviour to see if it changes in connection with the virus. The idea is that persons will enter data about themselves on a webpage. The authority has developed this digital tool in cooperation with the Public Health Agency and the National Board of Health and Welfare. The tool has been ready for a couple of weeks, but has not been launched, waiting for the go-ahead from the other authorities. On 27 April, the Swedish Civil Contingencies Agency stated that the further work has been paused after a request from the Public Health Agency.¹¹¹ The Public Health Agency claims that the potential risks are much greater than the potential gains. Furthermore, the regions and the county administrative boards (*Länsstyrelserna*) fear that the introduction of the digital tool may lead to greater concern and worries among the general population, which in turn will lead to an increase of visits to the healthcare centres.¹¹²

2.4 Any other privacy and data protection concerns

The Data Protection Authority encourages actors responsible for personal data to reconsider if it is necessary for digital education to expose pupils to webcams and audios, and to what extent. The persons responsible for personal data are encouraged to document their considerations so they can form the basis for the assessment of the actor's motivation for its data processing. The authority mentions three questions that the responsible persons should consider:

- Can it be enough to only show or hear the teacher?
- How can pupils with protected identities participate in the digital education?
- How are the personal data of pupils and teachers protected against unauthorized access?¹¹³

On 6 April 2020, the government presented a bill to the parliament proposing that infection with covid-19 shall be added to annexes of the Communicable Diseases Act as a publicly dangerous disease. This means that the measures defined in the Communicable Diseases Act that only can be taken in relation to diseases that are a danger to the public and to society at large such as e.g. forced medical examination, isolation, health checks on the place of entry, quarantine and barriers may be taken in relation to covid-19. The amendments are proposed to enter into force on 1 July

¹¹⁰ Sweden, Swedish Data Protection Authority (*Datainspektionen*), 2020, The corona virus and digital tracing of infectivity (*Coronaviruset och digital smittspårning*), [available here](#)

¹¹¹Sweden, Swedish National Contingencies Agency (*Myndigheten för samhällsskydd och beredskap*), 2020, The development of digital tool is paused (*Utvecklingen av digitalt verktyg pausas*), 27 April 2020, [available here](#)

¹¹² Sweden, 'Digital tracing of infectivity stopped' (*Digital kartläggning av smittspridning stoppas*), in *Läkartidningen*, 28 April 2020, [available here](#)

¹¹³ Sweden, Swedish Data Protection Authority (*Datainspektionen*), 2020, Digital education (*Digital undervisning*), [available here](#)

2020.¹¹⁴ The parliament's Committee on Health and Welfare (*Socialutskottet*) will process the government bill and any member bills (*motioner*) on 5 May. The decision date is to be announced.¹¹⁵

On 23 April 2020, the government announced that they take measures to decrease the risks at the gambling market, brought on by the outbreak of covid-19.¹¹⁶ The government will also commission the Swedish Gambling Authority (*Spelinspektion*) to strengthen its inspections of unlicensed companies and take actions for consumer protection in relation to gambling. Statistics from the Tax Agency (*Skatteverket*) show that several of the largest companies offering online casino gambling opportunities are growing rapidly in Sweden. The responsible minister said that the recent development with reduced opportunities for betting (on sports etc.) in combination with the increased risks of unemployment, sick absences and economic uncertainties leads to great risks in the gambling sector. Consequently, the government must act quickly to protect Swedish consumers. A memorandum is on consultation until 8 May. The memorandum proposed the introduction of weekly maximum deposits, obligations for gamblers to set a maximum time for their gambling on online casinos, and maximum amounts for bonuses.¹¹⁷ The proposed temporary ordinance is suggested to enter into force on 1 June and cease to be valid by the end of 2020.

¹¹⁴ Sweden, Ministry of Health and Social Affairs (*Socialdepartementet*) (2020) Covid-19 and changes in the Communicable Diseases Act (*Covid-19 och ändringar i smittskyddslagen*), Government Bill Prop. 2019/20:144, 6 April 2020, [available here](#)

¹¹⁵ Sweden, Swedish Parliament, Committee on Health and Welfare (*Riksdagen, Socialutskottet*), Covid-19 and changes in the Communicable Diseases Act (*Covid-19 och ändringar i smittskyddslagen*), [available here](#)

¹¹⁶ Sweden, Ministry of Finance (*Finansdepartementet*) (2020) The Government takes measures to reduce risks at the gambling market due to the outbreak of covid-19 (*Regeringen vidtar åtgärder för att minska riskerna på spelmarknaden till följd av utbrottet av covid-19*), press release, 23 April 2020, [available here](#)

¹¹⁷ Sweden, Strengthened protection of gamblers due to the spreading of the disease covid-19 (*Ett stärkt spelarskydd till följd av spridningen av sjukdomen covid-19*), memorandum Fi2020/01934/OU, 24 April 2020, [available here](#)