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FIFTH EVALUATION ROUND

Preventing corruption and promoting integrity in
central governments (top executive functions) and
law enforcement agencies

SECOND COMPLIANCE REPORT

SWEDEN



Adopted by GRECO
at its 94th Plenary Meeting (Strasbourg, 5 – 9 June 2023)



Group of States against Corruption
Groupe d'États contre la corruption

COUNCIL OF EUROPE



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I. INTRODUCTION

1. GRECO's Fifth Evaluation Round deals with "Preventing corruption and promoting integrity in central governments (persons entrusted with top executive functions, PTEFs) and law enforcement agencies (LEA)".
2. This Second Compliance Report assesses the measures taken by the authorities of Sweden to implement the recommendations issued in the Fifth Round Evaluation Report on Sweden which was adopted at GRECO's 82nd Plenary Meeting (22 March 2019) and made public on 3 May 2019, following authorisation by Sweden. The Fifth Round Compliance report on Sweden was adopted by GRECO at its 87th plenary meeting (25 March 2021) and made public on 24 November 2021, following authorisation by Sweden (GrecoRC5(2021)1). GRECO noted that further progress was necessary to demonstrate an acceptable level of compliance with the recommendations and asked the Head of Delegation of Sweden to provide a report on the progress in implementing the recommendations.
3. As required by GRECO's Rules of Procedure,¹ the authorities of Sweden submitted a Situation Report on measures taken to implement the recommendations contained in the Evaluation Report. This report was received on 4 January 2023 and served as a basis for this Second Compliance Report.
4. GRECO selected Finland (with respect to top executive functions in central governments) and Austria (with respect to law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed were Mr Mikko HELKIÖ on behalf of Finland, and Ms Silvia THALLER on behalf of Austria. They were assisted by GRECO's Secretariat in drawing up the Compliance Report.

II. ANALYSIS

5. GRECO, in its Fifth Round Evaluation Report, addressed fifteen recommendations to Sweden. In the Compliance Report, GRECO concluded that recommendation xiv had been implemented satisfactorily, recommendation iv had been dealt with in a satisfactory manner, recommendations i, viii, x, xi, xii and xiii had been partly implemented and recommendations ii, iii, v, vi, vii, ix and xv had not been implemented. Compliance with the thirteen outstanding recommendations is dealt with below.

Regarding central governments (top executive functions)

Recommendation i

6. *GRECO recommended developing and implementing a strategy, based on a risk analysis, to promote integrity and improve the prevention and management of conflicts of interest and corruption among persons entrusted with top executive functions*

¹ The Compliance procedure of GRECO's Fifth Evaluation Round is governed by its Rules of Procedure, as amended: Rule 31 revised bis and Rule 32 revised bis.

7. GRECO recalls that this recommendation was partly implemented in the Compliance Report. GRECO welcomed the anti-corruption action plan for the public administration adopted by the Government, as well as the support to the implementation of the action plan provided by the Agency of Public Management. However, the action plan applied to public administration in a wide meaning and was not sufficiently precise in respect of PTEFs.
8. The authorities of Sweden explain that the anti-corruption action plan, which runs to the end of 2023, is addressed to all central government agencies. The aim of the action plan is not to propose new legal measures, but to provide the agencies with tools, working methods and best practices to enable them to pursue preventive work against corruption in an efficient and structured way. It also allows the government to evaluate the progress of central government agencies in the area of preventive anti-corruption work.
9. The government concludes in the action plan that there is a need to further develop the preventive work. To this end, the Swedish Agency for Public Management has been tasked by the government to promote the preventive work of government agencies. It is developing recommendations, advice and tools to promote structured working methods against corruption. For example, the agency runs a network for national public agencies where they can exchange experiences and best practices and have produced tools to aid public agencies to e.g. implement risk analyses and protection for whistle-blowers.
10. As part of the action plan, the Swedish Agency for Public Management has been tasked to produce reports surveying the progress made by national public agencies in the area of preventive work. The first such report was handed over to the government in June 2021. The final report is due by the end of 2023. The evaluations contained in these reports will provide a baseline for further action.
11. In addition, the government recently tasked the Agency to prepare a similar report for public agencies and public corporations on the regional and municipal levels. That report should be submitted by June 2023.
12. GRECO notes that the anti-corruption action plan referred to in its previous report is ongoing and runs until the end of 2023. It also takes notes of the evaluation work of this action plan carried out by the Swedish Agency for Public Management. It acknowledges that the Government Offices, in which both state secretaries and political advisers are employed, are covered by the action plan. That said, as it noted in its previous report, no reference is made to specific measures, tools or recommendations targeting PTEFs specifically, or the Government as a central agency. GRECO hopes that the further action to be decided based on the Agency's evaluations will take into account this category of persons and their specific risks.
13. GRECO concludes that recommendation i remains partly implemented.

Recommendation ii

14. *GRECO has recommended (i) that persons entrusted with top executive functions be subject to enforceable rules of conduct and (ii) consolidating these rules into one code of conduct and making it easily accessible to the public*
15. GRECO recalls that this recommendation was not implemented in the Compliance Report. Work towards the adoption of a code of conduct at the Government Offices was welcomed by GRECO, but this work was still at a too early stage to warrant even a partial implementation of the recommendation.
16. The Swedish authorities indicate that the Government Offices revised its” Information for politicians in the Government Offices” in September 2022 and made it available to the new government. This latest version has a new disposition, to make it clearer and easier to find the right information for different themes and the section on ethical issues has been revised.
17. This document deals with all aspects of working life for PTEFs in the Government Offices. It is written for and given to ministers, state secretaries, political advisers and political press officers, as part of a welcome package to newly appointed PTEFs in the Government Offices. It is intended as a “go to” document when questions arise and as a source of information on what rules to observe in different situations. The guidelines, rules and laws that it refers to are available on the Intranet and easily found. In many parts of the so-called “Handbook for Politicians”, the PTEFs are advised to turn to their ministry’s Director General for Administrative Affairs in case of doubt regarding how to act in a certain situation.
18. Together with the e-learning module on ethical dilemmas this document constitutes a consolidated code of conduct which specifically targets PTEFs in the Government Offices. Information for politicians in the Government Offices is prepared by the Government Offices and all ministries are involved in its preparation. It is decided by the Head of the Government Offices Office for Administrative Affairs. It is available on the intranet of the Government Offices and on the external website of the Government².
19. The Information for politicians in the Government Offices is composed of 19 chapters and contains information about practical aspects such as for example, rules regarding conflict of interest, restrictions applicable to ministers and state secretaries when leaving government, rules regarding travel etc. It contains practical examples on e.g., what gifts can be accepted on behalf of the state. It also contains descriptive texts which aim to provide PTEFs with necessary background regarding the foundations on which the government and Government Offices operate, including the governing rules and regulations applicable, such as the principles of legality and impartiality. The chapter on ethical questions contains rules and regulations applicable to PTEFs and places focus on, for example, the rules regarding conflict of interest, rules related to receiving gifts,

² [information-for-politiker-i-regeringskansliet.pdf \(regeringen.se\)](#). All information regarding rules applicable to politicians is available at: [Regeringskansliet - Regeringen.se](#)

invitations, and rewards etc. It includes references to the Riksdag's parliamentary control (i.e., the scrutiny by the Committee on the Constitution), to the rules regarding employees (state secretaries, political advisers) and to the applicable binding rules of the Swedish Criminal Code.

20. GRECO welcomes the document on "Information for politicians in the Government Offices". This document targets all PTEFs and covers all the relevant integrity issues, such as gifts, invitations, travel, conflicts of interest, post-employment restrictions etc. in a detailed and illustrated manner. It also deals with enforcement, through the Parliament, the rules applicable to employees or the Criminal Code, as applicable. This document is published on the internet.
21. Although the "Information for politicians in the Government Offices" does not take the usual form of a code of conduct, GRECO takes the view that it serves an equivalent purpose, as it compiles all relevant rules in one single document containing detailed explanations, which provide thorough guidance to PTEFs in a number of situations linked to the exercise of their functions.
22. GRECO concludes that recommendation ii has been dealt with in a satisfactory manner.

Recommendation iii

23. *GRECO recommended (i) systematically providing dedicated training on ethics, conflicts of interests and prevention of corruption to persons entrusted with top executive functions, at the start of their term and on a regular basis throughout their term of office; and (ii) establishing a mechanism for confidential counselling for such officials on integrity related issues*
24. It is recalled that this recommendation was not implemented in the Compliance Report. GRECO welcomed the on-going development of a compulsory training session for ministers, state secretaries and political advisers. However, it noted that there were no plans to repeat this exercise. Furthermore, nothing concrete as to the provision of training had yet materialised. Therefore, the first element of the recommendation could not be considered as complied with, even partly. No information was provided on the second element of the recommendation, which, therefore, was also not implemented.
25. The Swedish authorities report, as regards the first part of the recommendation, that an introductory course is provided for ministers, state secretaries and political advisers, which includes a module on ethical principles and conflict of interest. This online course is repeated at regular intervals together with other on-site in person training activities. It is an e-learning module which is accessible to PTEFs at any time before and after regular sessions, the idea being to provide PTEFs with the possibility to access the entire module or parts of it at their own convenience. In addition, a new more extensive training initiative on ethics, conflicts of interest and prevention of corruption targeting PTEFs is finalised and ready for use in 2023. The new course is digital in format and is built around dilemma exercises that are adapted to be relevant for politically appointed staff in the Government Offices. It includes exercises on e.g. conflicts of interest, outside

activities and rules on gifts. Information is also given on ethical principles for the public sector and on where participants can find more information.

26. As regards the second part of the recommendation, the authorities explain that questions of ethics and conflicts of interest can be directly discussed with the Directors General for Administrative Affairs in their respective ministries. These persons are senior non-political officials employed by the Government in accordance with §34 of the Regulation with instruction for the Government Offices. They are mandated to ensure that the government's administrative matters are handled in compliance with governing rules and regulations, are dealt with consistently and in a uniform manner. In their role, the Director Generals act as guardians and advisors to the ministry's political leadership in those matters. They are permanent employees of the Government Offices, and any termination of their employment is subject to the Employment Protection Act. The confidential character of these discussions was clarified by the Government Offices. It has been confirmed that information and advice provided by the Directors General for Administrative Affairs is not in itself covered by the principle of public access to information.
27. GRECO welcomes the information provided as regards the introductory course for ministers, state secretaries and political advisers, as well as the new digital course for PTEFs on ethics, conflicts of interest and prevention of corruption. It notes that these training initiatives are made available on a regular basis throughout the PTEFs' term of office. The first element of the recommendation is, therefore, implemented satisfactorily.
28. Regarding the second element of the recommendation, GRECO notes that questions of ethics and conflicts of interest may be directly discussed, in a confidential manner, with the Directors General for Administrative Affairs of the respective ministries. GRECO would find it preferable that such advice be provided by persons or bodies with no hierarchical relation with the persons who seek counsel. However, in the specific context of Sweden, given the role of Directors General as advisers of the political leadership in legal and administrative matters, it accepts that this element of the recommendation is dealt with in a satisfactory manner.
29. GRECO concludes that recommendation iii is implemented satisfactorily.

Recommendation v

30. *GRECO recommended (i) introducing rules and guidance on how persons entrusted with top executive functions engage in contacts with lobbyists and other third parties seeking to influence governmental processes and decisions; and (ii) that sufficient information about the purpose of these contacts be disclosed, such as the identity of the person(s) with whom (or on whose behalf) the meeting(s) took place and the specific subject matter(s) of the discussion*
31. In the absence of measures taken to give effect to the recommendation, GRECO recalls that it was not implemented in the previous report.

32. The Swedish authorities provide no new information regarding this recommendation.
33. GRECO concludes that recommendation v remains not implemented.

Recommendation vi

34. *GRECO recommended that an independent assessment of the implementation of the “Act concerning restrictions when ministers and state secretaries transition to non-state activities” be conducted (regarding in particular the persons covered and the length of the restriction period) and that the Act be amended, if necessary, in view of its results*
35. It is recalled that this recommendation was not implemented in the Compliance Report. The “Act concerning restrictions when ministers and state secretaries transition to non-state activities” entered into force in June 2018. For examinations under the Act, a special examination body was established – the Board for the Examination of Ministers’ and State Secretaries’ Transitions, an independent body under the Swedish Parliament. As the Board had been established recently, there were not yet sufficient cases and decisions to feed an independent assessment. GRECO underlined that such an assessment should be a priority down the line, given the doubts about the scope, content and effectiveness of the Act expressed at the time of the evaluation.
36. The Swedish authorities indicate that an independent assessment of the implementation of the “Act concerning restrictions when ministers and state secretaries transition to non-state activities” is now being conducted by a commission of inquiry. Legislative reforms are often preceded by commissions of inquiry in the Swedish political system. The Government issues a directive to the commission outlining the task of the inquiry and appoints the head of the commission. Once formed, the commission of inquiry obtains the status of a public agency. In the Swedish system of public administration, public agencies are organisationally separate from the Government. The commission therefore works independently within the remit set by the directive.
37. The assessment aims to analyse if the length of the restriction period is appropriate or if it needs to be extended, if sanctions should be introduced, and to consider if the categories of persons covered by the act should be expanded. In the view of its results, the assessment is mandated to make proposals for any necessary legislative amendments. The independent assessment will be completed and delivered to the Government Offices in August 2023. The final report will then be circulated to relevant government agencies, organisations, local authorities and other stakeholders for comments, in accordance with standard practice.
38. GRECO welcomes the on-going independent assessment of the implementation of the “Act concerning restrictions when ministers and state secretaries transition to non-state activities” and is looking forward to being informed of its results, possible proposals and follow-up thereto in its next report.
39. GRECO concludes that recommendation vi is partly implemented.

Recommendations vii and viii

40. *GRECO recommended:*

- *(i) enshrining in legislation the obligation for ministers, state secretaries (as well as political experts, as appropriate) to declare significant liabilities, previous positions, agreements with previous employers, agreements with current or future employers or clients and (ii) considering providing information on their spouses and dependent family members (it being understood that such information would not necessarily need to be made public)(**recommendation vii**);*
- *that declarations submitted by persons entrusted with top executive functions be subject to substantive control (**recommendation viii**).*

41. GRECO recalls that recommendation vii was not implemented in the Compliance Report, in the absence of measures taken to give effect to it. Recommendation viii was partly implemented. GRECO welcomed the arrangements taken to ensure a more substantive control of declarations, namely the fact that persons subject to the duty of declaring holding of financial instruments now have to produce documents supporting their declaration, such as a bank or stockbroker statement. GRECO also welcomed that the accuracy of the information contained in the declarations is now subject to control by the Government Offices. Moreover, GRECO welcomed the fact that the declarations and supporting documents are public and subject to media scrutiny and that the Parliament's Committee on the Constitution exercises a review. That said, GRECO took the view that substantive control should also cover the additional elements to be included in the broader declaration system to be introduced as per recommendation vii.

42. The Swedish authorities submit that no legislation to fulfil the first part of recommendation vii has been enacted. That said, the Government Offices points out that there is no general obligation for persons residing in Sweden to declare "significant liabilities" to agencies such as the Swedish Tax Agency. Therefore, were ministers and state secretaries required to declare such matters to the Government Offices, it would not be possible for the Government Offices to facilitate a substantive control of these declarations as per recommendation viii by comparing these declarations to, for example, tax statements.

43. GRECO regrets that no developments have been reported concerning the obligation for PTEFs to declare significant liabilities and information on spouses and dependent family members. It takes the view that, even though there is no general obligation for Sweden residents to declare significant liabilities to the tax authorities, the declaration of such liabilities by PTEFs does have added value from the perspective of fostering integrity. Significant liabilities may be a source of real, potential or perceived conflicts of interest and it is useful for the public and civil society to be aware that such elements may inform PTEFs' positions on certain issues. The same applies to the assets, interests and significant liabilities of the persons sharing their household, even though the information that PTEFs would need to declare in this regard would not necessarily need to be made public. As regards the declaration of previous positions, agreements with previous employers, or agreements with current or future employers or clients, no new

elements are reported either and the declaration of such elements would certainly have an added value for the prevention of conflicts of interest. Therefore, in the absence of tangible progress, recommendation vii still cannot be considered implemented.

44. As regards recommendation viii, GRECO notes that there are no new developments since its last report. It already took into account the fact that the Government Offices carry out substantive control of the elements that are currently included in PTEFs' declarations of assets and financial interests, namely financial instruments. However, as indicated in paragraph 41 above, it took the view in its previous report that substantive control should also cover the additional elements to be included in the broader declaration system to be introduced according to recommendation vii. Therefore, recommendation viii remains partly implemented.
45. GRECO concludes that recommendation vii remains not implemented and recommendation viii remains partly implemented.

Recommendation ix

46. *GRECO recommended that a mechanism of supervision and enforcement be instituted in respect of compliance by persons entrusted with top executive functions with rules of conduct*
47. GRECO recalls that this recommendation was not implemented in the Compliance Report.
48. The Swedish authorities provide no new information regarding this recommendation.
49. GRECO concludes that recommendation ix remains not implemented.

Regarding law enforcement agencies

Recommendation x

50. *GRECO recommended (i) that a code of conduct for the Police Authority be adopted and published, with concrete examples and explanations regarding the conduct expected of police officers and (ii) that it be accompanied by effective oversight and enforcement*
51. GRECO recalls that this recommendation was partly implemented in the Compliance Report. The first part was fully implemented, as an internal governing document adopted by the National Police Commissioner entered into force on 18 December 2020. This document provides appropriate guidance to employees regarding the conduct expected of them. The second part of the recommendation was not implemented, as no measures had been reported to comply with it.
52. The Swedish authorities indicate that in addition to the above-mentioned policy on ethics, the National Commissioner decided in February 2021 to implement a specific guiding tool in the form of a "compass", consisting of four core values and twelve

behaviours that are expected to be followed by all employees in order to fulfil the Police's mission. The behaviours emanate from research and proven experience and should be used as a guide in the everyday work. The compass was published in March 2021 on the internal website of the Police and is complemented with instructions on how it should be applied in practice. The compass is used in management training and at management meetings with the aim of making the managers aware of the existence of the compass and passing it on to their employees.

53. The Human Resources Department is responsible for the oversight and enforcement of the policy and secures follow-up through a key-activity stated in the National Strategic Activity Plan. The e-policy is complemented with a training module (also described below under recommendation xi). One purpose of the training module is to clarify how the policy should be applied in practice. Finally, a separate dialogue instruction was developed and implemented in July 2022 for managers on all levels on how to perform continuous dialogue with all employees to maintain focus on these issues.
54. In order to follow up on irregularities on a national level, the Police regions and departments report yearly to the Financial Division concerning the quantity and type of irregularities, description of follow-up, crime prevention measures carried out during the period, including routines and controls, in order to reduce the risk for future irregularities and corruption (including breach of trust).
55. All employees are required to follow the rules and guidelines set out in the Swedish Police Authority's policy documents, such as the Swedish Police Authority's ethical policy. Managers at all levels are obliged to take measures to ensure that the policy documents are followed. If information emerges suggesting that an employee has neglected the obligations that follow from their employment by violating rules laid out in policy documents, this may result in disciplinary sanctions in the form of a warning or salary deductions. In some less serious cases, corrective talks can also be used. The police region or department at which the employee is placed must report this immediately to the Staff Disciplinary Board. The matter is investigated by the police region where the employee is placed. The decision to report a matter to the Staff Disciplinary Board is taken by the head of police region or head of department. On the Swedish Police Authority website³, the Staff Disciplinary Board publishes yearly every case handled, including any decision concerning sanctions.
56. GRECO welcomes the information provided as regards the arrangements for the oversight and enforcement of the ethical policy applicable to the Police. These arrangements, which rest on the responsibility of managers at all levels and the follow-up by the Human Resources Department, the Financial Division and the Staff Disciplinary Board, fulfil the effectiveness requirements of the second part of the recommendation. GRECO recalls that the first part was already assessed as fully implemented in the previous report.
57. GRECO concludes that recommendation x has been implemented satisfactorily.

³ [Personalansvarsnämnden vid Polismyndigheten -Verksamhetsrapport med referat av ärenden för år 2021 och register för åren 2015-2021.pdf](#). The report concerning 2022 will be published by mid-June 2023.

Recommendation xi

58. *GRECO recommended (i) enhancing the induction and in-service training of the police in the areas of integrity, conflicts of interest and corruption prevention and (ii) that a mechanism be introduced for providing confidential advice to police officers on ethical and integrity matters*
59. It is recalled that this recommendation was partly implemented in the Compliance Report, as implementation of both of its parts was well under way. As regards the first part, GRECO welcomed the development of the training module and the e-learning tool on the prevention of corruption, ethics and core values that was to be available for all employees as soon as the ethics policy has been established, as well as the decision to create a dedicated webpage on the Police Authority's internal website. These tools, however, were not yet operational.
60. As regards the second part of the recommendation, GRECO commended the decision by the National Police Commissioner to establish a special structure for confidential counselling within the Police Authority. However, this structure had not yet been established in practice.
61. Regarding the first part of the recommendation, the Swedish authorities report that the e-learning tool referred to in the previous report has been in place since July 2022. It forms part of the basic training and the in-service training for all police employees; participation is mandatory. The e-learning tool is accessible on the Police Authority's intranet and it includes information about relevant legislation, core values, corruption, ethics, etc. The tool is partly interactive in the way that the employee has to reflect on different situations presented and then choose the right answers. The tool also includes several short videos in order to reinforce learning. The e-learning is concluded with a knowledge test and a certificate of completion is issued if the employee passes the test.
62. To highlight issues on ethics, transparency, prevention of irregularities etc., the Police Authority has gathered information on the internal website. This information was made available in July 2022 and includes rules, regulations, questions and answers, internal steering documents, internal system for reporting irregularities, to whom employees can turn to receive advice on questions relating to ethics, integrity, reporting etc.
63. As regards the second part of the recommendation, the authorities report that, in June 2022, the National Police Commissioner decided to give the new whistleblower structure (see below under recommendation xv) an advisory role. It means that all employees can turn to the structure for advice (including confidential advice), for example concerning reporting of irregularities and issues of integrity. This role became operational when the whistleblower structure started its operations in July 2022. The employees can use the same contact method used when reporting and get a direct answer from the structure. If the employee seeks confidential advice, and it is not in connection with reporting, this is primarily arranged through telephone, as the person can choose to be anonymous.

64. As regards both parts of the recommendation, GRECO welcomes that the tools and structure that were assessed positively in its previous report have now become operational. Both parts of the recommendation are, therefore, fully complied with.

65. GRECO concludes that recommendation xi has been implemented satisfactorily.

Recommendation xii

66. *GRECO recommended developing a streamlined system for authorisation of secondary activities within the Police Authority, which is coupled with effective follow-up*

67. GRECO recalls that this recommendation was partly implemented in the Compliance Report. A review and overhaul of the system of authorisation of secondary activities was under way in the Police Authority. Its aims were consistent with the objectives of the recommendation. However, the new measures decided were not yet in place.

68. The Swedish authorities recall that following GRECO's findings, the Police Authority has conducted an overhaul of the whole system to ensure that the assessment of secondary activities is uniform throughout the whole organisation, and that there is a system for effective follow-up. The measures based on the findings of the review were implemented during 2021 and include new and explicit information to all employees on the internal website of the Police, i.e., what can be considered as a secondary activity and what an employee must do to have such an activity assessed. The website also contains information on the regulation regarding secondary activities. The processing of all applications for secondary activities takes place at national level at the Police Authority's Human Resources Department. It includes an in-depth investigation into all relevant circumstances of the application and an opinion from the employee's line manager, as well as, if necessary, from the Legal Affairs Department or the Financial Affairs Department. The decision of authorisation or refusal of the secondary activity is issued in writing. The handbook for secondary activities has been revised and updated accordingly, in order to clarify rules, routines and processes. A discussion on secondary activities is now also routinely a part of the formal development dialogue every manager must carry out yearly with all their employees. The secondary activities are also mentioned in the Policy on ethics.

69. In general, there are three types of side activities that government officials, such as police officers, are not allowed to engage in: untrustworthy side activities, work-impeding side activities and competitive side activities.

70. GRECO welcomes the new streamlined system for authorisation and effective follow-up of secondary activities in the Police. This system is consistent with the objectives of the recommendation.

71. GRECO concludes that recommendation xii has been implemented satisfactorily.

Recommendation xiii

72. *GRECO recommended publishing information on complaints received, action taken and sanctions applied against police employees, including possible dissemination of the relevant case-law, while respecting the anonymity of the persons concerned*
73. GRECO recalls that this recommendation was partly implemented in the Compliance Report. The National Police Commissioner had decided to publish information on complaints received and investigations carried out by the Special Investigations Department, and there was on-going work towards establishing a designated portal containing this information on the Police Authority's external website. The publication of selected case law in the internal monthly publication that is available to all police employees was also assessed by GRECO as a positive measure.
74. The Swedish authorities now report that, in addition to the case law published in the internal monthly publication, "Svensk Polis", case law and statistics on complaints received and action taken have also been published on the external website of the Police⁴ since March 2021.
75. On the website of the Police Authority,⁵ the Special Investigations Department publishes on an on-going basis accounts of judgments that concern its area of responsibility. These accounts contain a summary of the incident and the court's reasoning, the criminal sanction in the event of a conviction and, where applicable, a statement from the Staff Disciplinary Board to the court on the consequences in terms of labour law that a conviction will have for the employee. The relevant web page also provides a link to the Staff Disciplinary Board's activity report for the previous year, which contains accounts of matters that have been examined by the Board, any labour law sanctions that have been imposed as well as statistics on incoming matters⁶. The Special Investigations Department also publishes information about how the reports it receives are dealt with, statistics on the number of incoming matters, the distribution across various offence categories and the distribution across officials reported.
76. GRECO welcomes the information reported regarding the online publication of statistics regarding complaints and case-law from the relevant courts and the Staff Disciplinary Board, including sanctions.
77. GRECO concludes that recommendation xiii has been implemented satisfactorily.

Recommendation xv

78. *GRECO recommended providing dedicated guidance and training on whistleblower protection for all levels of hierarchy and chains of command in the Police Authority*
79. GRECO recalls that this recommendation was not implemented in the Compliance Report. The National Police Commissioner had decided to establish a whistleblower structure in the Police Authority, but no measure had yet been taken to this end. No

⁴ <https://polisen.se/om-polisen/sarskilda-utredningar/exempel-pa-domar/>

⁵ www.polisen.se

⁶ See footnote 3.

measure had been taken either to provide guidance and training on whistleblower protection.

80. The Swedish authorities indicate that the Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law (EU Directive on the protection of whistleblowers) has been implemented into national law (SFS 2021:890). The new law entered into force on 17 December 2021.
81. In June 2022, the National Police Commissioner decided to implement a new whistleblower structure within the Police Authority. The structure became operational on 17 July 2022, under the aegis of the department of supervision at the Office of the National Police Commissioner is responsible for the function. The structure is independent and receives reports from Police employees through telephone, email, regular mail or personal meetings. The employee can remain anonymous by sending a report by regular mail. The structure ensures, through follow-up no later than three months after receiving the report, that measures are carried out in order to deal with relevant irregularities within the organisation.
82. The e-learning tool mentioned under recommendation xi provides information about the whistleblower function. Information is also included in the revised continuous training for leaders on all levels. In addition, all employees are welcome to contact the structure for advice, which can be arranged through telephone, email, or physical meetings inside or outside the Police premises. Specific information regarding the structure and its operational processes are published on the internal and the external websites.
83. GRECO welcomes the fact that the whistleblower structure within the Police Authority has now become operational, and that awareness about this structure is raised through various means, including the e-learning training tool that is compulsory for all Police employees, in-service training for leaders on all levels, information on the Police internal and external websites, as well as information provided by staff of the structure themselves. Accordingly, GRECO considers that the recommendation is fully complied with.
84. GRECO concludes that recommendation xv has been implemented satisfactorily.

III. CONCLUSIONS

85. **In view of the foregoing, GRECO concludes that Sweden has implemented satisfactorily or dealt with in a satisfactory manner nine of the fifteen recommendations contained in the Fifth Round Evaluation Report.** Of the remaining recommendations, three have been partly implemented and three have not been implemented.
86. More specifically, recommendations iii, x, xi, xii, xiii, xiv and xv have been implemented satisfactorily, recommendations ii and iv have been dealt with in a satisfactory manner,

recommendations i, vi and viii have been partly implemented and recommendations v, vii and ix have not been implemented.

87. With respect to top executive functions, GRECO notes that progress was achieved since the last report. A detailed handbook containing enforceable rules on all integrity-related matters applies to all ministers, state secretaries and political advisers. An introductory course on ethics, conflicts of interest and prevention of corruption is now provided on an on-going basis to these persons at the start of their functions and they have access to confidential counselling on these issues. An independent assessment of the implementation of the “Act concerning restrictions when ministers and state secretaries transition to non-state activities” is on-going. It is also positive that the elements included in declarations of assets and interests by top executive officials are subject to an accuracy control by the Government Offices, but the material scope of these declarations needs to be widened. Work also remains to be done on other issues, such as on supervision of compliance by top executive officials with rules of conduct, on rules and transparency as regards contacts with lobbyists.
88. As far as law enforcement agencies are concerned, GRECO commends the Police for having fully complied with all recommendations. An internal document on ethics has been adopted and awareness-raising about this document and issues of ethics and integrity has become an integral part of compulsory induction and in-service training. A dedicated whistleblower protection mechanism has been established, which is also responsible for providing confidential advice on integrity issues. The system for authorisation of secondary activities (tbc) for Police employees has been streamlined and subjected to effective follow-up by managers. Finally, information on complaints received against Police employees is now published on several channels, along with information on the follow-up given to these complaints and sanctions taken.
89. In view of the above, GRECO concludes that Sweden is not in sufficient compliance with the recommendations contained in the Fifth Round Evaluation Report within the meaning of Rule 31 revised bis, paragraph 10 of the Rules of Procedure. GRECO therefore decides to apply Rule 32 revised, paragraph 2 (i) and asks the Head of delegation of Sweden to provide a report on the progress in implementing the outstanding recommendations (i.e. recommendations i and v-ix) as soon as possible, however – at the latest – by 30 June 2024.
90. GRECO invites the authorities of Sweden to authorise as soon as possible the publication of the present report, to translate it into the national language and to make this translation public.