# OECD Anti-Corruption and Integrity Outlook: Country Fact Sheet 2024





# **Contextual factors**

State structure	Executive power	Legislative system	Legal system
Unitary	Parliamentary	Unicameral	Civil law

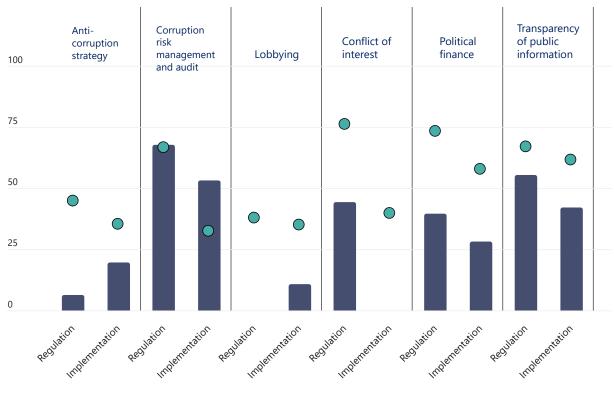
## Strategy and institutions on anti-corruption and public integrity

To date, while there is no single anti-corruption strategy and no single government body responsible for mitigating integrity risks in the public sector, the <u>National Public Procurement Strategy</u> includes primary level policy objectives to mitigate integrity risks in public procurement. At the end of 2020 the Government also adopted the <u>National Action Plan Against Corruption</u> for the period 2021-2023.

There are different institutions which have the mandate to mitigate public integrity risks in their corresponding fields. The <u>Swedish National Financial Management Authority</u> is the central harmonisation unit for internal control (IC) and internal audit (IA) and has the mandate for financial management of Government activities. The <u>Swedish National Audit Office</u> (Riksrevisionen) is the Supreme Audit Institution under the Swedish parliament (Riksdag). The <u>Legal</u>, <u>Financial and Administrative Services Agency</u> (Kammarkollegiet) has the mandate to oversee the financing of political parties and election campaigns. There are no central bodies responsible for mitigating public integrity risks in lobbying or overseeing the submission of conflict-of-interest declarations. While the Freedom of the Press Act regulates access to information and the <u>Parliamentary Ombudsmen</u> can process complaints related to access to information requests, there is no specific supervisory body for public information.

# **Overview**

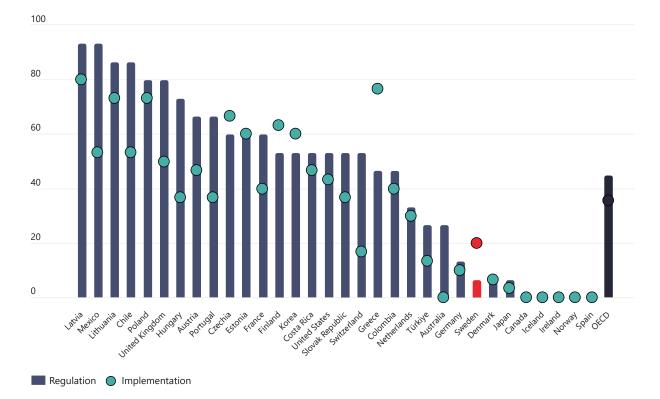
# Figure 1. Overview



Sweden OECD

Greatest strengths	Areas to improve	
Corruption risk management and audit	Conflict of interest	
Anti-corruption strategy - implementation	Lobbying	
Transparency of public information	Political finance	

## **Anti-corruption strategy**



## Figure 2. Anti-corruption strategy

Sweden fulfils 7% of criteria on the quality of the strategic framework and 20% on the implementation of the strategy, compared to the OECD average of 45% and 36%, respectively.

While there is no single anti-corruption strategy in Sweden, the National Procurement Strategy includes strategic objectives to mitigate public integrity risks in public procurement. There is no preparatory analysis available for the National Public Procurement Strategy, and the strategy does not describe public integrity risks in detail, contain outcome-level indicators for public integrity objectives, or set target values for the outcome-level indicators. In terms of implementation of the strategy, there is a central function responsible for co-ordinating the implementation, monitoring, reporting, and evaluation of the action plan for this strategy.

The National Action Plan Against Corruption, 2021-2023 was adopted after the OECD's initial data collection and therefore is not included in this analysis.

## Corruption risk management and audit

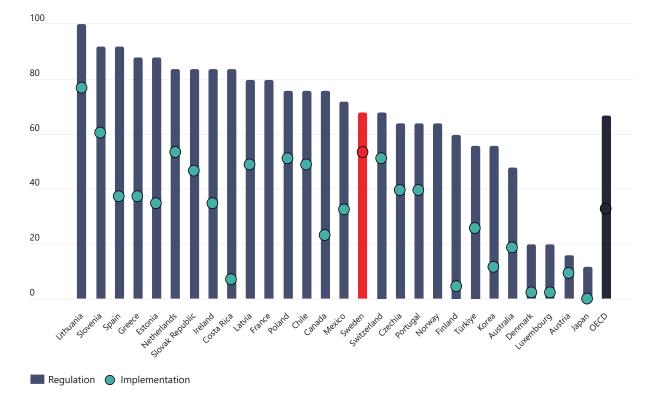


Figure 3. Corruption risk management and audit

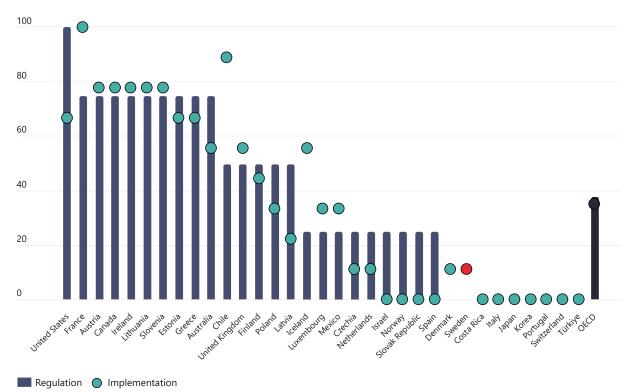
As measured against OECD standards on risk management, which include internal control and internal audit, Sweden fulfils 68% of criteria on regulations and 53% on practice, compared to the OECD average of 67% and 33%, respectively.

Regulations define internal control and internal audit according to international standards, establish managerial responsibility regarding implementation of internal control and internal audit, specify the objectives of internal control, and establish annual internal control and internal audit reporting activities. Furthermore, the risk management framework explicitly addresses public integrity risks, delegates responsibility for conducting risk assessments to management, and requires public institutions to adopt an entity-wide risk register. However, there is room for improvement in terms of regulations on internal audit, as the regulations do not stipulate that the head of the internal audit function has direct and unrestricted access to political staff. Moreover, there are no standards directly aimed at the conduct and ethical behaviour of internal auditors; and while there are guidelines, regulations do not prohibit internal audit staff from auditing operations for which they have previously been responsible.

In practice, 34% of central budget organisations are covered by internal audit and were internally audited in the past five years, although these organisations make up 95% of the central budget. Moreover, 90% of internal audit recommendations issued were adopted by management within a year, although Sweden does not track the number of internal audit recommendations which were actually implemented.

# Lobbying





As measured against OECD standards on lobbying, Sweden does not fulfil any criteria on regulations and fulfils 11% on practice, compared to the OECD average of 38% and 35%, respectively.

While there are no regulations on lobbying and no lobbying register, there is a publicly available register of beneficial ownership of corporate entities. Regulating lobbying activities is important to avert capture of public policies by special interests. A regulatory framework that establishes clear definitions for lobbying can help to ensure that lobbying enhances rather than inhibits effective policy making. Additional disclosure requirements such as a lobbying register increase transparency, thus enabling public awareness of the actors influencing policy.

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# **Conflict of interest**

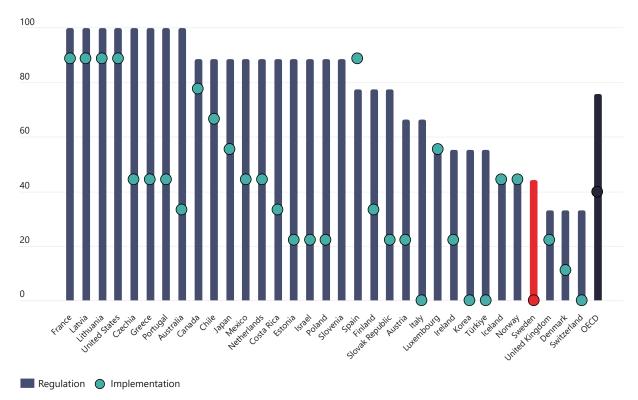


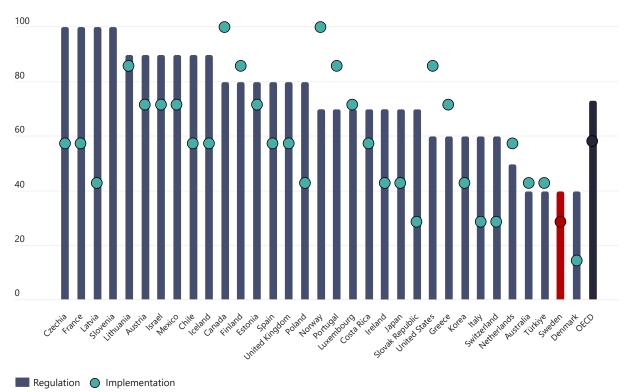
Figure 5. Conflict of interest

As measured against OECD standards on conflict of interest, Sweden fulfils 44% of criteria on regulations and does not fulfil any criteria on practice, compared to the OECD average of 76% and 40%, respectively.

Regulations define circumstances and relationships that can lead to conflict-of-interest situations for public officials, establish the obligation to manage them, and define sanctions for breaches of conflict-of-interest provisions in proportion to the severity of the offence. While members of the Government and parliament (Riksdag) are required to declare their interests upon taking up office and when the information changes, there is no equivalent requirement for public employees in high-risk positions, top-tier civil servants, or members of the highest bodies of the judiciary. In practice, there is no central authority responsible for collection and verification of interest declarations, and Sweden does not collect data on the submission of interest declarations at the central government level.

# **Political finance**



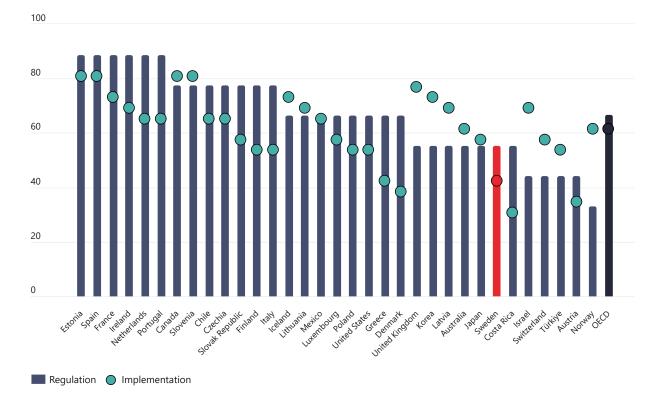


As measured against OECD standards on political finance, Sweden fulfils 40% of criteria on regulations and 29% of criteria in practice, compared to the OECD averages of 73% and 58%, respectively.

Regulations establish that political parties have the obligation to report their finances regularly and to make their financial reports public, including all contributions exceeding a fixed ceiling. However, regulations do not completely ban anonymous donations, contributions from foreign states and enterprises, or contributions from publicly owned enterprises. In practice, financial reports from all political parties are publicly available on a single online platform in a user-friendly format. While the Legal, Financial and Administrative Services Agency has the mandate to oversee political parties, it does not have financial accountability directly to the Swedish parliament (Riksdag) and does not have certified auditors on its payroll. Moreover, aggregated data on the number of cases related to breaches of political finance regulations, number of investigations conducted, and a breakdown of the different types of sanctions are not published on the website of the Legal, Financial and Administrative Services Agency.

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# **Transparency of public information**



## Figure 7. Transparency of public information

As measured against OECD standards on public information, which include access to information and open data, Sweden fulfils 56% of criteria on regulations and 42% on practice, compared to the OECD average of 67% and 62%, respectively.

The only restrictions to access to public information allowed are listed by law and are in line with the Tromso Convention, and the regulations establish the right to appeal in the case of refusal of an administrative agency. Sweden is among the few OECD countries where information requested is always provided free of charge. Furthermore, requesters are not required to provide justification for their requests.

In practice, there is proactive disclosure of the following integrity-related datasets: consolidated versions of all primary laws, the state budget for the current calendar year, the results of the last national elections, legislative proposals of the government, Government meeting agendas, ministers' agendas, the company registry, and the land registry. However, aggregated data on access to information requests, public tenders and their results, salaries of individual senior civil servants, and asset and interest declarations of high-level officials are not published.