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European Working Group on Labour Law



Protecting Workers From Violence and Harassment in the Workplace

**European Working Group on Labour
Law**

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By: Alicia Oldenmark, Lilian Malaki, Oliwia Majdak & Oscar Eriksson

Supervision: Prof. Petra Herzfeld Olsson, Prof. Laura Carlson



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Section I: General Framework, Legal Definitions, and National Perspectives

1.1 Please present the legal definitions of the key terms related to workplace violence and harassment as they are used in your national legal system. These may include, but are not limited to, for example: harassment, sexual harassment, workplace violence, domestic violence (in its relevance to the workplace), bullying or mobbing, victimisation, physical violence, reprisals, hate speech, cyber violence, etc.

In the Swedish legal system, violence and harassment in working life are regulated through the interaction between the Discrimination Act (2008:567), the Work Environment Act (1977:1160), and the Swedish Penal Code (1962:700). The following section sets out definitions of the key concepts.

Harassment:

Harassment is defined in the Swedish Discrimination Act as a conduct that violates a person's dignity and that is connected to one of the protected grounds validated by the Discrimination Act. The seven grounds is sex transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation or age. Such conduct may take physical, verbal or non-verbal forms¹. The acts or treatment constitute a disadvantage in the form of harm or discomfort, thereby violating the individual's dignity. The conduct must involve noticeable and clear violations thereby violating the individual's dignity. The conduct must involve noticeable and clear violations, purely trivial differences in treatment should not be regarded as a disadvantage and therefore do not constitute harassment². The person engaging in harassment must be aware that the behaviour violates the individual in a way that may constitute discrimination under one of the seven protected grounds in the Discrimination Act. For this reason, the person subjected to

¹ Swedish Government Official Reports, SOU 2021:86 *Betänkande av utredningen om ILO:s konvention om våld och trakasserier i arbetslivet*, p. 107.

² Swedish Legislative bill for the Discrimination Act, Prop. 2007/08:95 *Ett starkare skydd mot diskriminering*, pp. 492–493.



the conduct should make it clear that the behaviour is unwanted, unless the conduct is so manifestly offensive that the perpetrator must reasonably understand that it is experienced as unwanted³. It is the person subjected to the conduct who determines whether the behaviour or acts are unwanted and offensive, which means that the assessment should not be based on what is typically regarded as offensive⁴.

Sexual harassment:

Sexual harassment is a particular right of harassment. While harassment may involve violations connected to any of the seven grounds of discrimination, sexual harassment is specifically linked to behaviour of a sexual nature that violates a person's dignity (Chapter 1 Section 4 paragraph 5 of the Discrimination Act). The conduct or treatment must constitute a disadvantage in the form of harm or discomfort in a way that infringes upon the individual's dignity. Such conduct may be verbal, non-verbal, or physical⁵. Verbal conduct of a sexual nature may involve unwelcome suggestions or pressure for sexual intercourse. Examples of non-verbal conduct of a sexual nature include pornographic images, objects, or written materials. Physical conduct of a sexual nature may include unwanted physical contact through touching, pinching, or rubbing against another person's body⁶. The most severe forms of sexual harassment constitute criminal offences, such as rape, sexual molestation, or sexual exploitation, which is criminalised under the Swedish Penal Code (e.g. Chapter 6 of the Swedish Penal Code)

In similarity to harassment, the person engaging in sexual harassment must be aware that the behaviour or act is unwanted. The subjective assessment of the person subjected to the conduct is decisive in determining whether a particular action is unwanted or offensive, and the person concerned should therefore make it clear to the other party that the behaviour is unwanted⁷. Such

³ Swedish Legislative bill for the Discrimination Act, Prop. 2007/08:95, p. 493.

⁴ Swedish Legislative bill for the Discrimination Act, Prop. 2007/08:95, p. 493.

⁵ Swedish Legislative bill for the Discrimination Act, Prop. 2007/08:95, p. 494.

⁶ Swedish Government Official Reports, SOU 2021:86, p. 108.

⁷ Swedish Government Official Reports, SOU 2021:86, p.108.



clarification is not required where the behaviour or act is so manifestly offensive that the perpetrator must reasonably understand this.

Victimisation

In the regulations on organisational and social work environments, victimisation is defined as actions directed against one or more employees in an abusive manner that may lead to ill health or to the affected persons being excluded from the workplace community. The Swedish Work Environment Authority's guidance to the regulations explains that to violate means to humiliate or demean someone through words or actions. Differential treatment refers to being treated differently from others in an incomprehensible and unfair manner, with the risk of being excluded from the workplace community.

The Act on the protection of persons who report wrongdoing (2021:890)⁸ contains provisions on the protection of individuals who, in a work-related context, have received or obtained information about wrongdoing and report it⁹. Reporting refers to providing information about wrongdoing, orally or in writing, through internal reporting, external reporting, or public disclosure. The protection consists of a prohibition against preventing or attempting to prevent reporting, as well as against taking reprisals due to such reporting. The protection also includes immunity from liability and the right to compensation in the event of a breach of these prohibitions. Central to the Whistleblower Act are also the questions of who the prohibitions are directed at and who is protected. To be covered by the protection, certain conditions must be met¹⁰. In addition to the requirement that the wrongdoing being reported must be of public interest, the reporting person must, at the time of the report, have had reasonable grounds to believe that the information about the wrongdoing was true, and the report must be made internally, externally, or through public disclosure in the manner prescribed by the Whistleblower Act.

⁸ Hereinafter referred to as the Whistleblower Act.

⁹ Statue Comment on the Whistleblower Act, Henric Ask, Bo Ericsson, Erik Grahn, Lag (2021:890) om skydd för personer som rapporterar missförhållanden, den inledande kommentaren till lagen. Karnov 2026-03-11 (JUNO).

¹⁰ Legislative bill on the Whistleblower Act, Prop. 2020/21:193 *Genomförande av visselblåsdirektivet*, pp. 109-110.



Violence and threats:

Violence in working life is addressed both as an occupational health and safety risk and as a criminal offence. The regulations issued by the Swedish Work Environment Authority¹¹ cover situations in which employees are exposed to violence or threats of violence, including cases where such conduct originates from persons outside the workplace, that is, third parties. As the regulations on violence and threats form part of systematic work environment management, the employer is responsible for continuously examining and risk-assessing the operation with regard to the occurrence of violence and threats of violence.¹² In addition, violence is classified as a criminal offence under Chapter 3, Section 5 of the Swedish Penal Code, where assault is defined as a person inflicting bodily injury, illness, or pain on another person, or placing that person in a state of unconsciousness or helplessness.

Unlawful threats are regulated in Chapter 4, Section 5 of the Swedish Penal Code and arise where a person threatens another with a criminal act in a manner that is intended or likely to cause the threatened person serious fear for their own or another person's safety with regard to life, health, property, liberty, or personal integrity.

Domestic violence:

Yes. Although domestic violence is not regulated as a separate labour law category in Sweden, the legal system increasingly acknowledges that violence in close relationships may have significant implications for working life and therefore must be addressed within existing legal frameworks¹³. Domestic violence in close relationships is described as a pattern of acts, including physical, psychological, or sexual violence, or neglect, committed by a current or

¹¹ Swedish Work Environment Authority's provisions (AFS 2023:2)..

¹² Swedish Government Official Reports, SOU 2021:86, p. 55.

¹³ Swedish Government Official Reports, SOU 2021:86, pp. 251-252.



former partner or another close person. In working life, domestic violence is recognised as an issue that may affect employment, health, and safety¹⁴. Employers have a responsibility to mitigate the impact of domestic violence on an employee's ability to work through work adaptation measures, such as adjusted working hours or modified work tasks.

The Swedish Government has also put forward proposals to strengthen awareness and detection of violence in close relationships, including within the workplace context, as part of its broader action programme to prevent and combat men's violence against women, intimate partner violence, honour-related violence, and oppression¹⁵. In December 2024, the Government granted support to the Swedish Association of Local Authorities and Regions (*SKR*) to enhance employers' ability to identify and respond to cases where a colleague may be subjected to intimate partner violence or honour-related violence and oppression. By equipping employers with better tools and education, the initiative seeks to improve early detection and appropriate support for affected employees within the workplace¹⁶.

1.2 Provide a general overview of how workplace violence and harassment are addressed in your national legal and policy framework.

Workplace violence and harassment in Sweden are addressed through a comprehensive legal and policy framework that combines occupational health and safety law, anti-discrimination law, criminal law, and national policy measures.

The Work Environment Act places primary responsibility on employers to prevent both physical and psychosocial risks, including violence, threats, and harassment, through systematic work environment management and preventive measures¹⁷. Employers must work with systematic

¹⁴ Swedish Government Official Reports, SOU 2021:86, p. 249.

¹⁵ Regeringen "*Frihet från våld, förtryck och utnyttjande*", <https://www.regeringen.se/artiklar/2026/01/frihet-fran-vald-fortryck-och-utnyttjande/> (Last visited 12/03-2026)

¹⁶ For further information see Section V Question one.

¹⁷ Swedish Government Official Reports, SOU 2021:86, p. 43.



work environment management (*systematisk arbetsmiljöarbete, SAM*), which means continuously identifying risks, taking preventive measures, following up incidents, and improving the work environment¹⁸. The Government's work environment regulations also require employers to prevent unhealthy workloads, victimisation, and other psychosocial risks¹⁹.

Harassment and sexual harassment linked to protected discrimination grounds are additionally prohibited under the Discrimination Act, which requires employers to take active preventive measures and investigate incidents²⁰. Employers must implement reasonable measures to prevent discrimination and investigate complaints of harassment or sexual harassment in the workplace²¹.

Serious acts of violence and harassment are further addressed through criminal law, including offences such as assault, unlawful threats, and sexual offences²².

Trade unions (*fackförbund*) play an important role in addressing workplace violence and harassment. They represent worker's interests and contribute to safer working environments by negotiating collective agreements and supporting employees who experience harassment or unsafe working conditions. In addition, trade unions can influence employers to strengthen preventive measures and promote compliance with labour laws and workplace regulations²³.

¹⁸ Arbetsmiljöverket (2025), (The Swedish Work Environment Authority) "*Systematiskt arbetsmiljöarbete*", <https://www.av.se/arbetsmiljoarbete-och-inspektioner/arbeta-med-arbetsmiljon/systematiskt-arbetsmiljoarbete/> (Last visited 12/03-2026)

¹⁹ Government Communication 2015/16:80 *A Work Environment Strategy for Modern Working Life 2016–2020*, p. 1.

²⁰ Swedish Government Official Reports, SOU 2021:86, pp. 60–61, 107–111.

²¹ Diskrimineringsombudsmannen (2024) (the Equality Ombudsman) "*Discrimination in working life*", <https://www.do.se/choose-language/english/what-is-discrimination/discrimination-in-working-life#:~:text=Employers%20are%20also%20responsible%20for&text=Harassment%20is%20conduct%20that%20violates,to%20temporary%20and%20borrowed%20staff> (Last visited 12/3-2026).

²² Swedish Government Official Reports, SOU 2021:86, pp. 112–118.

²³ International Labour Organisation. (2017). *Violence and harassment against women and men in the world of work: Trade union perspectives and action*, pp. 1–2.

https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_dialogue/@actrav/documents/publication/wcms_546645.pdf (Last visited 12/3-2026)



A key role in workplace safety is also played by safety representatives (*skyddsombud*). Safety representatives monitor the work environment and represent employees in work environment matters. They participate in workplace safety activities and can demand that employers take measures to ensure a satisfactory work environment and comply with work environment legislation. If there is an immediate and serious danger to employees' life or health, safety representatives also have the right to stop dangerous work until the issue has been addressed²⁴.

The inquiry on Sweden's implementation of ILO Convention No. 190²⁵ concludes that Swedish law largely already meets the conventions requirements. However, it recommends clarifying in the Work Environment Act that the work environment should, as far as possible, be free from violence and harassment in order to strengthen prevention and legal clarity²⁶. In line with these conclusions, the Swedish Government has recently submitted a legislative proposal to ratify ILO Convention. The legislative bill confirms that Swedish law is already largely compatible with the ILO Convention and that the existing legal framework, primarily consisting of the Work Environment Act, the Discrimination Act and relevant criminal law provision, provides protection against violence and harassment in working life²⁷.

a) Has your country ratified ILO Convention No. 190? Describe legislative changes adopted or anticipated as a result.

Sweden has not ratified the ILO Convention concerning the elimination of violence and harassment in the world of work, and steps toward ratification are currently underway. However, a governmental inquiry²⁸, has concluded that Swedish legislation is nevertheless compatible with the ILO Convention. This situation has attracted criticism from, inter alia, trade union

²⁴ Arbetsmiljöverket, (Swedish Work Environment Authority) (2025) *Safety representatives*. <https://www.av.se/en/work-environment-work-and-inspections/safety-representatives/> (Last visited 12/3-2026).

²⁵ Hereinafter referred as the ILO Convention.

²⁶ Swedish Government Official Reports, SOU 2021:86, pp. 277–285.

²⁷ Swedish Legislative bill for the ILO Convention, Prop 2025/26:134 *ILO:s konvention om avskaffande av våld och trakasserier och trakasserier i arbetslivet och ILO:s konvention om en säker och hälsosam arbetsmiljö*, p. 15.

²⁸ Swedish Government Official Reports, SOU 2021: 86 *ILO:s konvention om våld och trakasserier i arbetslivet*.



organisations, such as TCO, which have pointed out that Sweden's neighbouring countries, Denmark, Finland, and Norway, have already ratified ILO Convention²⁹. Nevertheless, SOU 2021:86 makes clear that Swedish law meets the requirements set out in the Convention, indicating that, in principle, there are no legal obstacles to ratification.

As mentioned in the previous answer, the Swedish Government has recently submitted a legislative proposal³⁰, recommending that Sweden approve and ratify ILO Convention. The Government confirms the inquiry's conclusion that Swedish law is already broadly consistent with the Convention's requirements. However, the proposal includes a legislative clarification in the Work Environment Act, stating that the working environment should, as far as possible, be free from violence and harassment.³¹ The purpose of this amendment is to strengthen prevention and improve legal clarity by explicitly recognising violence and harassment as central work environment issues. The proposal also highlights that the current regulatory framework addressing violence and harassment is spread across several legal regimes, including occupational health and safety law, discrimination law, and criminal law³². The clarification in the Work Environment Act is therefore intended to make the employer's preventive responsibilities clearer, including in relation to violence and harassment committed by third parties.

In conclusion, while Sweden has not yet formally ratified ILO Convention, the Government has proposed ratification and minor legislative clarifications. These measures aim to strengthen the visibility and coherence of existing protections rather than introduce major new legal obligations.

²⁹TCO (2024) "*Det behöver göras mer mot hot och våld i arbetslivet – ratificera ILO-konvention 190 nu!*" <https://tco.se/fakta-och-politik/arbetsmarknad/det-behover-goras-mer-mot-hot-och-vald-i-arbetslivet-ratificera-ilo-konvention-190-nu> (Last visited 12/3-2026).

³⁰ Swedish Legislative bill for the ILO Convention,, Prop. 2025/26:134.

³¹ Swedish Legislative bill for the ILO Convention, Prop. of the ILO Convention 2025/25:134, pp. 69–71.

³² Swedish Legislative bill, Prop. for the ILO Convention 2025/25:134, p. 70.



b) Identify and describe other influential international or European legal documents impacting national policy on workplace harassment and violence.

As a member of the European Union (EU) Sweden is obligated to implement any directive presented by the EU into Swedish law as well as being bound by any regulation presented by the EU. As a result of this, multiple documents from the EU have impacted Sweden's national policy regarding workplace harassment and violence, either by being incorporated into Swedish law or being directly applicable. Another thing worth mentioning in regards to Sweden's membership in the EU is that the Council of the European Union has encouraged all of its members to ratify the ILO Convention, something which previously been stated Sweden have not yet done at time of writing this³³.

There are also multiple directives passed by the EU that have been implemented into Swedish law like the Racial Equality Directive (2000/43/EC), the Council Directive 2000/78/EC of 27 November 2000 establishing a general framework for equal treatment in employment and occupation as well as Directive 2006/54/EC of the European Parliament and of the Council of 5 July 2006 on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation. All these directives have been implemented into the Swedish discrimination act³⁴. The Council Directive 89/391/EEC of 12 June 1989 on the introduction of measures to encourage improvements in the safety and health of workers at work have also impacted national policy by having been implemented into the Swedish Work Environment act³⁵. Another important legislative act which Sweden has an obligation to implement but have not yet done is the European Parliament and Council: Directive (EU) 2024/1385 of 14 May 2024 on combating violence against women and domestic violence. Sweden has not yet fully implemented the directive but has assigned an inquiry to how the directive should be implemented into the Swedish legal system³⁶.

³³ The council of the European Union (2024) "*Bekämpning av våld och trakasserier på arbetsplatsen: rådet uppmanar EU-länderna att ratificera ILO-konvention*"

³⁴ Swedish Legislative bill for the Discrimination Act, Prop. 2007/08:95, p. 47.

³⁵ Swedish Legislative bill for Work Environmental Act, Prop. 2001/02:1445 *Ändringar i arbetsmiljölagen*, p. 6.

³⁶ Press release, The Swedish Justice department regarding the implementation of European Parliament and Council: Directive (EU) 2024/1385 of 14 May 2024 on combating violence against women and domestic violence.



Outside of Sweden's obligation to follow the directives and regulation from the EU the European Convention on Human Rights has been implemented into Swedish law through chapter 2 section 19 of The Instrument of Government (1974:152), which says that no law can be passed which violates the European Convention on Human Rights. This also means that any article of the Convention is considered to be Swedish law³⁷. This means that for example article 8 regarding the right to respect for private and family life as well as article 14 on the prohibition on discrimination are directly applicable within the Swedish legal system.

c) Apart from adopting legislation, how else are public authorities involved in combating violence in the workplace? For instance, do they implement national action plans or establish monitoring or support mechanisms for victims and employers?

Public authorities, primarily the Swedish Work Environment Authority in collaboration with the Equality Ombudsman (DO), are tasked with producing information regarding the expectations of employers to prevent violence and harassment³⁸. The Swedish Work Environment Authority works against violence in the workplace by adopting provisions and general guidelines for employers. One of those is *Guidelines for managing social health risks at work – victimization and bullying*, which deals with offensive discrimination and bullying, and is primarily aimed at occupational health care³⁹. Apart from provisions and guidelines, Swedish public authorities offer support and tools from knowledge organizations, such as Prevent, which has developed a checklist, as well as industry-specific online training and other tools that can be used to support employers in working against violence in the workplace⁴⁰.

³⁷ Swedish Legislative bill for the Incorporation of the European Convention and other issues concerning fundamental rights and freedoms, Prop. 1993/94:117 *Inkorporering av Europakonventionen och andra fri- och rättighetsfrågor* p. 33.

³⁸ Swedish Government Official Reports, SOU 2021:86, p, 293.

³⁹ Arbetsmiljöverket (2026) (Swedish Work Environment Authority) "*Guidelines for managing social health risks at work – victimization and bullying*"

<https://www.av.se/en/work-environment-work-and-inspections/publications/guidelines-for-occupational-health-services/managing-social-health-risks-victimization-bullying/> (Last visited 12/03-2026)

⁴⁰ Arbetsmiljöverket (2025) (Swedish Work Environment Authority) "*Violence and threats of violence*" <https://www.av.se/en/health-and-safety/violence-and-threats-of-violence/> (Last visited 12/03-2026).



In addition, the Equality Ombudsman provides guidance on employers' obligations under the Discrimination Act, including how to prevent and address harassment and sexual harassment related to protected discrimination grounds⁴¹. Another relevant authority is the Swedish Gender Equality Agency (Jämställdhetsmyndigheten), which coordinates national efforts to promote gender equality and to combat men's violence against women, domestic violence and honour-related violence. Through knowledge development, coordination and support to authorities and employers, the agency contributes indirectly to preventing violence and harassment that may also affect individuals in working life⁴².

1.3 Explain the integration of harassment and violence within your national anti-discrimination laws.

Violence in working life is primarily regulated through the interaction between the Work Environment Act, the Discrimination Act, and the Swedish Penal Code. Within the framework of anti-discrimination law, the Discrimination Act establishes two mechanisms addressing different situations in working life.

First, the Act contains a direct prohibition against harassment and sexual harassment in the relationship between employer and employee when the conduct is connected to a protected ground of discrimination⁴³. The prohibition applies to all employers as well as to any person who has the authority to make decisions on behalf of the employer, such as managers or supervisors.

Second, the Discrimination Act also establishes an investigation and action duty for the employer when harassment occurs between employees. If an employer becomes aware that an employee considers themselves to have been subjected to harassment or sexual harassment by another

⁴¹ Diskrimineringsombudsmannen (DO) "Aktiva åtgärder för arbetsgivare" <https://www.do.se/for-arbetsgivare-och-utbildningsanordnare/aktiva-atgarder-for-arbetsgivare> (Last visited 12/3-2026)

⁴² Jämställdhetsmyndigheten (The Swedish Gender Equality Agency) "Fakta om jämställdhet" <https://jamstalldhetsmyndigheten.se/fakta-om-jamstalldhet/> (Last visited 12/3-2026)

⁴³ Swedish Government Official Reports, SOU 2021:86, p. 20.



employee in connection with work, the employer must investigate the circumstances and take appropriate measures to prevent continued harassment⁴⁴.

The Discrimination Act also contains provisions that have effects similar to a prohibition. In addition, the regulations on organisational and social work environments issued by the Swedish Work Environment Authority include provisions that have effects comparable to a prohibition. In cases involving violence and serious forms of harassment, including serious forms of sexual harassment, Swedish criminal law legislation becomes applicable⁴⁵.

a) Discuss specific measures addressing harassment based on gender, race, sexual orientation, disability, age or other protected categories (if any).

Harassment and sexual harassment are integrated into the Discrimination Act as specific forms of discrimination. Harassment is defined in Chapter 1, Section 4 paragraph 4 of the Discrimination Act, and sexual harassment in Chapter 1, Section 4 paragraph 5. Violence is not defined as a specific form of discrimination under the Discrimination Act, however, physical assaults may fall within the concept of harassment where the conduct violates a person's dignity and is connected to a protected ground of discrimination. Violence and threats of violence are primarily regarded as work environment risks that the employer has a duty to prevent under the Work Environment Act⁴⁶. More serious acts of violence are addressed through the criminal law provisions on assault (Chapter 3, Section 5 of the Swedish Penal Code), molestation or harassment (Chapter 4, Section 7), and unlawful threats (Chapter 4, Section 5)⁴⁷.

Specific measures for the seven protected grounds:

The Discrimination Act covers seven protected grounds, as set out in Chapter 1, Section 5 of the Act, namely sex, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation, and age. For these groups, specific obligations apply. Where an employer

⁴⁴ Discrimination Act (2008:567) Chapter 2, Section 3.

⁴⁵ Swedish Government Official Reports, SOU 2021:86, p. 20.

⁴⁶ Swedish Government Official Reports, SOU 2021:86, pp. 158 and 163.

⁴⁷ Swedish Government Official Reports,, SOU 2021:86, p. 19



becomes aware that an employee considers themselves to have been subjected to harassment in connection with the employer's activities, the employer has an immediate duty to investigate the circumstances and to take such measures as may reasonably be required to prevent continued harassment. This obligation is regulated in Chapter 2, Section 3 of the Discrimination Act and is sanctioned by compensation for discrimination if it is neglected. In addition, employers are required to conduct continuous preventive work to counteract discrimination and to promote equal rights and opportunities, which includes having policies and procedures in place to prevent harassment, sexual harassment, and reprisals⁴⁸. Harassment on the ground of age is also prohibited.⁴⁹ The term age is considered the length of time an individual has lived, measured from birth to a specific point in time, typically expressed in years⁵⁰.

b) Is there also a broader, general legal definition of workplace violence and harassment that goes beyond these specific categories?

Beyond the Swedish Discrimination Act, violence and harassment in the workplace are covered in the Work Environment Act, which aims to prevent risks to health and create a safe and secure working environment for all employees⁵¹. Although this Act does not contain any detailed definitions of "violence", it still establishes the ground for the work with work environment questions, including social and psychosocial risks, where the employer has an obligation to systematically identify and prevent risks that may affect an employee's health and security⁵².

The Swedish Work Environment Authority's regulations on organisational and social work environment (for example AFS 2023:2) more specifically govern issues such as offensive treatment, bullying, and victimisation. These rules apply regardless of whether the behaviour is connected to a protected ground of discrimination or not, meaning that violence, threats,

⁴⁸ Swedish Legislative bill for the Discrimination Act, Prop. 2007/08:95, p. 65.

⁴⁹ Discrimination Act (2008:567) Chapter 1, Section 1.

⁵⁰ Discrimination Act (2008:567) Chapter 1, Section 5, point 6.

⁵¹ Work Environment Act (1977:1160) Chapter 1 Section 1.

⁵² Work Environment Act (1977:1160) Chapter. 2 Section 2.



bullying, and other forms of offensive conduct that do not qualify as discrimination are still covered by the employer's duty under work environment law to take preventive measures.

In addition to discrimination and work environment liability, serious forms of violence, threats, threats of violence, and sexual offences occurring in the workplace may constitute crimes under the Swedish Penal Code. However, this is a matter of criminal liability that falls outside both the Discrimination Act and the Work Environment Act, although it remains relevant to the overall legal framework governing workplaces.

c) If so, how is it framed, and what is its practical significance?

As has been explained in the previous question there exists a broader definition of workplace harassment and violence in both the Discrimination Act and the Swedish Penal Code this means that who is covered by which act depends on if the different laws are applicable in the specific situation. The Work Environment Act and the Discrimination Act are applicable for workers or employees in their worklife whilst the Swedish Penal Code is applicable to harassment or violence in general. The practical significance of this is that there exists situations where all of the acts are relevant and there is an overlap between them whilst in other situations only one or two of them is relevant.

1.4 Is there a way for a worker to defend against violent incidents that does not fall under above (p. I.1) basic definitions?

The broad definition of violence and harassment across the legal framework does not leave a lot of space for situations that are perceived as violent to fall outside of the legal definition⁵³.

However situations where certain actions might be unpleasant but not violent in nature can occur

⁵³ See the answer to question 1.1 above.



and fall outside of the legal definition⁵⁴. Even in situations where there is no immediate threat of violence or harassment, but an employee notices shortcomings in the employer's work environment efforts and a risk that such incident may take place, work environment problems should be raised directly with the employer, the workplace safety representative or the regional safety representative. Under these circumstances, work environment problems should be raised directly with the employer, the workplace safety representative or the regional safety representative. Safety representatives are representatives of employees in matters relating to the work environment. The Swedish Work Environment Authority also receives tips from employees about risks in the work environment occurring in the workplace⁵⁵. Additionally, union members can seek support from their trade union when no safety representative is available at the workplace⁵⁶.

Even when the employer follows the required Systematic work environment management, there might still be need for individual measures, for example because of stressful environments that could lead to increased sick leaves. The employee can request individual work adaptation like adapting work tasks or social support in order to improve their work environment⁵⁷.

⁵⁴ Cf. the definition of violence and harassment in question 1.1 above.

⁵⁵ Arbetsmiljöverket (Swedish Work Environment Authority) "*Reporting health and safety risks*" <https://www.av.se/en/about-us/contact-us/reporting-health-and-safety-risks/> (Last visited 12/03-2026)

⁵⁶ Unionen (The Trade Union Unionen) "*Våld och hot om våld på jobbet*" <https://www.unionen.se/rad-och-stod/hot-vald-och-ran> (Last visited 12/03-2026)

⁵⁷ Swedish Work Environment Authority, "Work adaption – preventing or addressing sick leave" <https://www.av.se/en/health-and-safety/work-adaptation--preventing-or-addressing-sick-leave/> (Last visited 12/03-2026).



1.5 What statistical data is available in your country on the prevalence and nature of workplace violence and harassment (including sexual harassment, mobbing, and cyber violence)? What are the main sources of this data (e.g., labour force surveys, NGO reports, government monitoring bodies, social security institutions)?

The Swedish system relies on several sources in regards to monitoring violence and harassment. One of the official work environment statistics produced by the Swedish Work Environment Authority. The Authority is responsible for national statistics on work-related injuries, occupational diseases, and psychosocial risks. Its annual Work Injury Report is based on occupational injury notifications submitted to the Swedish Social Insurance Agency (Försäkringskassan) and includes data on incidents involving violence, threats, and organisational and social factors such as harassment and victimisation⁵⁸. In addition is the Work Environment Survey (*arbetsmiljöundersökningen*) which is conducted every two years by Statistics Sweden (SCB), on behalf of the Swedish Work Environment Authority⁵⁹. The survey is based on a large nationally representative sample of workers and provides data on, exposure to violence or threats of violence at work, bullying, sexual harassment, including gender-based harassment, harassment from colleagues, managers, clients, patients, customers or students and psychological and social work environment factors⁶⁰.

Another source is the National Crime Survey (*Nationella trygghetsundersökningen, NTU*) conducted by the Swedish National Council for Crime Prevention (*Brå*)⁶¹. Although not limited to the workplace, the survey includes specific questions on crimes committed in connection with a person's occupation, such as threats, assault, harassment, robbery, and sexual offences. The

⁵⁸ Swedish Official Reports, SOU 2021:86, p. 141.

⁵⁹ Arbetsmiljöverket (2025) (Swedish Work Environment Authority) "*Arbetssskade- och arbetsmiljöstatistik*" <https://www.av.se/arbetsmiljoarbete-och-inspektioner/arbetsmiljostatistik-officiell-arbetssskadestatistik/> (Last visited 26/01-2026)

⁶⁰ Swedish Official Reports, SOU 2021:86, p. 141.

⁶¹ Brottsförebyggande rådet (Swedish National Council for Crime Prevention) (2025) "*Nationella trygghetsundersökningen*" [Nationella trygghetsundersökningen | Brå - Brottsförebyggande rådet](https://www.brå.se/trygghetsundersokningen/) (Last visited 12/03-2026)



survey shows gender differences in exposure, with women reporting higher levels of work-related threats, and highlights increased vulnerability among certain occupational groups, such as healthcare, social services, education, and security-related professions⁶².

Section II: Coverage and Personal Scope of Protection Against Workplace Violence and Harassment

⁶² Swedish Official Reports, SOU 2021:86, pp. 142--143.



2.1 Which worker categories are covered by anti-violence regulations in your country?

In accordance with the Swedish Work Environment Authority's Regulation AFS 2023:2⁶³, concerning the provisions on violence in the workplace, the rules apply to all types of activities and to all employees facing a risk of violence or threats of violence. The type of violence or threats that may occur in a workplace depends on various factors, such as the profession, sector, or specific tasks performed. The regulation covers all forms of work that may involve exposure to violence or threats, regardless of the source, whether physical, through telephone communication, or via the internet. It is grounded in the Swedish Work Environment Act and requires employers to carry out risk assessments, implement preventive measures, and provide adequate support to employees.

The regulation is grounded in the Swedish Work Environment Act, which establishes the employer's general duty of care. Employers are required to systematically assess risks in the work environment, implement preventive organisational and technical measures, and ensure that employees who are exposed to violence and/or threats receive appropriate support and follow up measures.

Within Swedish labour law, a fundamental distinction is made between employees (*arbetstagare*) and independent contractors (*uppdragstagare*). The distinction between these two legal categories is not explicitly regulated in statutory law⁶⁴. Determining whether a person should be regarded as an employee or an independent contractor is therefore carried out through an overall assessment of all circumstances in the individual case. Guidance for this assessment is primarily derived from case law developed by the Swedish Labour Court, which over time has formulated a number of indicative criteria⁶⁵.

⁶³Arbetsmiljöverket (2025) (Swedish Environment Authority) "*Våld och hot om våld*" <https://www.av.se/halsa-och-sakerhet/vald-och-hot-om-vald/#1> (Last visited 12/03-2026).

⁶⁴Källström, K & Malmberg, J, "*Anställningsförhållanden*". 5th edition, Iustus förlag (2019), pp. 25-26.

⁶⁵Swedish Labour Court, AD 2012 nr 24 and AD 2013 nr 32.



The Swedish legislation presupposes that the concept of an employee is already understood, which explains why no explicit definition is provided in the statutory text⁶⁶. The starting point in the treatment of the concept in Swedish law has been that the various statutes refer to one and the same concept⁶⁷. Consequently, minor differences in the interpretation of the concept of an employee may occur between different statutes. This is primarily because the statutes pursue different purposes, and each must therefore be interpreted in light of its specific objective⁶⁸. However, the civil law concept of an employee is not discretionary but mandatory. This means that the parties to the labour market cannot define the concept arbitrarily in their collective agreements⁶⁹. In situations where it cannot be conclusively established whether an employment relationship exists or not, the Swedish Labour Court may rule in favor of the existence of an employment relationship⁷⁰.

Finally, it may also be relevant whether the performing party, from an economic and social perspective, is in a position comparable to that of an employee⁷¹.

The concept of an employee is gradually becoming broader and more uniform⁷². The free movement of workers and the increasing volume of EU labour law legislation have heightened the need for a common EU law definition. However, the point of departure in most EU provisions remains the Member States national interpretations of the concept of an employee⁷³.

⁶⁶ Sigeman, T. & Sjödin, E. (2025). *“Arbetsrätten : en översikt”*, 9th Edition,. Norstedts Juridik. (2025), p. 33.

⁶⁷ Källström, Kent., *Vem är att anse som arbetstagarare?* i Schmidt, Folke *Löntagarrätt*, Juristförlaget JF AB, 1994, p. 61.

⁶⁸ Sigeman and Sjödin (2025,) p. 29.

⁶⁹ Westregård, A., *“Plattformsarbetare och egenanställda i svensk rätt - en analys av arbetstagarbegreppet.”* 1th edition. Norstedts Juridik AB (2024), p. 46.

⁷⁰ Swedish Legislative Bill, Prop. 1975/76:105 *med förslag till arbetsrättsreform m.m.*, Bilaga 1. Arbetsrättsreform. Lag om medbestämmande i arbetslivet, p. 309.

⁷¹ Lagen.nu, *“Arbetstagarare”* <https://lagen.nu/begrepp/Arbetstagarare> (Last visited 12/03-2026)

⁷² Ds 2002:56 *Hållfast arbetsrätt för ett föränderligt arbetsliv*, p. 82.

⁷³ Glavå, M. & Hansson, M. 2023. *“Arbetsrätt”*. 5th Edition. Studentlitteratur AB, p. 83.



- a) Assess the coverage against the employment status such as employees, self-employed, individual contractors, trainees, informal workers, mid-level managers, upper management, etc.**

The level of legal protection against violence, threats, harassment, and other abusive conduct in working life varies depending on a person's employment status⁷⁴. Swedish law primarily builds protection around the existence of an employment relationship, though certain safeguards extend beyond formal employees⁷⁵.

Employees

Employees enjoy the most comprehensive protection. All employees, regardless of position, including managers and staff, are fully covered by the preventive and protective duties imposed on employers⁷⁶. In Swedish law, hired workers are generally equated with employees for responsibility purposes.

Under the Work Environment Act, employers are obliged to prevent violence, threats, bullying, and other forms of abusive conduct in the workplace. This includes systematic risk assessment, preventive measures, and follow-up responsibilities. In addition, the Discrimination Act protects against harassment and sexual harassment linked to legally recognised discrimination grounds. Collective agreements often supplement statutory protections by introducing additional procedures and safeguards.

⁷⁴ Swedish Official Reports, SOU 2021:86, pp. 39–40.

⁷⁵ Swedish Official Reports, SOU 2021:86, p. 95–102.

⁷⁶ Swedish Official Reports, SOU 2021:86, p. 43–46.



Self-Employed Persons

Self-employed persons are only partially covered. While they must comply with work environment rules insofar as their activities may pose risks to others, they are not subject to employer duties, nor do clients generally carry responsibility for their work environment⁷⁷.

The Work Environment Act primarily applies to employer and employee relationships, though certain provisions extend to self-employed persons, particularly in shared workplaces or high-risk sectors. However, self-employed individuals are not covered by the Discrimination Act in working life in the same way as employees. Nevertheless, criminal law protections against violence and threats apply fully, regardless of employment status.

Individual Contractors

Independent contractors are only partially protected, and coverage depends heavily on the factual circumstances of the working relationship. Classification is determined through case law, focusing on factors such as control, supervision, and the provision of tools⁷⁸.

If a contractor works under conditions similar to those of an employee, particularly under another party's control at a workplace, certain work environment obligations may apply to the entity exercising that control. Contractors are generally excluded from the employment-related provisions of the Discrimination Act unless they are legally classified as employees. Consequently, their protection is less extensive than that afforded to employees.

Trainees and Students

Trainees, apprentices, and students in workplace-based education are largely covered⁷⁹. The Work Environment Act explicitly extends protection to individuals participating in education or training at workplaces, placing responsibility on the host organisation.

⁷⁷ Swedish Official Reports, SOU 2021:86, p. 89.

⁷⁸ Swedish Official Reports, SOU 2021:86, pp. 39–40.

⁷⁹ Swedish Official Reports, SOU 2021:86, p. 110.



Harassment linked to discrimination grounds is also covered under the Discrimination Act in educational and training contexts. However, some forms of informal or purely educational practice may fall outside full employment-based protection.

Informal Workers

Informal workers occupy a legally uncertain position. Swedish labour law presumes formal employment relationships, meaning informal workers may face both legal and practical gaps in protection under work environment and discrimination legislation.

Where an informal worker can be considered a de facto employee based on established legal tests, work environment rules may apply in practice. Otherwise, protections resemble those applicable to self-employed persons. Importantly, criminal law protections against violence and threats apply regardless of employment status.

Mid-Level Management

Mid-level managers are generally classified as employees under Swedish labour law and therefore benefit from the same legal protections against violence, threats, harassment, and other forms of abusive conduct as other employees⁸⁰. This includes protection under both the Work Environment Act and the Discrimination Act.

Despite their managerial role, mid-level managers remain part of the employment relationship and are therefore entitled to the employer's preventive and protective duties regarding the work environment. At the same time, they often exercise delegated employer responsibilities, particularly in relation to implementing work environment measures, addressing workplace conflicts, and preventing harassment within their teams. This dual position means that while they may carry responsibility for enforcing workplace protections, they are also protected by the same legal framework if they themselves become victims of abusive conduct.

⁸⁰ Diskrimineringsombudsmannen (DO), "*Discrimination in working life*" <https://www.do.se/choose-language/english/what-is-discrimination/discrimination-in-working-life> (Last visited 12/03-2026).



Upper-Level Management

Upper-level management occupies a more complex legal and organisational position. While many senior managers are formally employed and therefore fall within the scope of labour and discrimination legislation, their role within the organisational hierarchy may affect the practical application of these protections.

In organisational terms, senior executives are often considered part of the employer's leadership structure and may be viewed as representing the employer rather than occupying the same position as ordinary employees. From a theoretical perspective, particularly in Marxist analyses of labour relations, upper-level management may be understood as being closer to the "capital" side of the employment relationship, while lower-level employees and managers represent labour. This conceptual distinction may influence how workplace protections are framed and applied within organisations.

Nevertheless, upper-level managers can still be exposed to discrimination, harassment, or abusive conduct, including from actors higher in the organisational hierarchy, such as executive directors, boards of directors, or company owners. Where such individuals are legally classified as employees, the protections provided by the Work Environment Act and the Discrimination Act remain applicable.

However, where senior executives are classified as company directors rather than employees, their protection under labour law and discrimination legislation may be more limited. In such situations, protection may rely more heavily on contractual arrangements and general legal protections, while criminal law provisions concerning violence, threats, and other offences continue to apply regardless of employment status.



b) Are the protections for these different categories found in one legislative act, or across several with respect to anti-violence legal measures for employees and categories of workers?

The primary protection in regards to anti-violence in the workplace for the different categories of workers is found in the Work environment act as well as the Discrimination act. The Work Environment act is a framework law intended to give employers a more broad responsibility for the protection of its employees and workers from violence⁸¹. As a result of this the Swedish Work Environment Authority gives out supplementary regulations which provide more detailed instructions for employers to follow. But this only applies for the categories of workers which are covered in the Work Environment Act. The categories of workers protected under the act are the ones that fall under the term “*worker*”, if an employee does not fall in under the term the protections set up by the law are not applicable. In chapter 1 section 2 of the Work environment act a worker is defined as somebody who performs tasks under the management and guidance of the employer.

Outside of The Work Environment Act the Swedish Penal Code also gives workers and employees a protection from violence in the workplace. The Penal Code unlike the The Work Environment Act extends the protection for all categories of workers.

2.2 Highlight any disparities in the legal protections or remedies among these different categories.

Protection against violence and harassment in the workplace varies in Sweden depending on employment status. The legislation is structured around a specific employment relationship, meaning that some groups enjoy stronger and more comprehensive protection than others⁸².

⁸¹ Swedish Legislative bill for the Work Environmental Act, Prop. 1976/77:149, p.1.

⁸² Swedish Official Reports, SOU 2021:86, pp. 39–40.



Employees

Employees have the most extensive legal protection. According to the Work Environment Act, the employer has a responsibility to prevent and manage risks of violence, threats and offensive discrimination through systematic work environment management⁸³. Failure to fulfil these obligations may in serious cases lead to criminal liability for work environment offences under the Swedish Penal Code⁸⁴. The Discrimination Act also provides protection against harassment and sexual harassment linked to grounds for discrimination,. Employers are required to investigate and take measures when such behaviour occurs, and victims might be entitled to discrimination compensation⁸⁵. Employees can also receive support through workplace mechanism such as safety representatives⁸⁶ and, where applicable, through their trade union⁸⁷. Safety representatives can request that the employer take measures to improve the work environment and, if the employer fails to act may refer the matter to the Swedish Work Environment Authority, whose decisions can be appealed in the Administrative Court⁸⁸. Access to union representation and the possibility of bringing certain labour law claims through union procedures depends on whether the employee is a union member and whether a safety representative is present at the workplace⁸⁹.

Mid- and Upper-Level Management

Mid- and Upper-Level Management have practically the same protection as other employees and the same opportunities for redress. However, their position may mean that by delegating work environment responsibilities in practice it makes it more difficult to act against deficiencies in the work environment⁹⁰. Protections under criminal law continue to apply.

⁸³ Work Environment Act (1977:1160), Chapter 3, Sections 2 and 2a.

⁸⁴ Swedish Penal Code (1962:700), Chapter 3, Section 10

⁸⁵ Discrimination Act (2008:567), Chapter 2, Sections 3 and 4

⁸⁶ Work Environment Act (1977:1160), Chapter 6, Section 2 and 6a

⁸⁷ Co-Determination in the Workplace Act (1976:580), Section 10.

⁸⁸ Work Environment Act (1977:1160), Chapter 7 Section 7, Chapter 9 Section 2 and 3.

⁸⁹ Cf. Co-Determination in the Workplace Act (1976:580), Section 10 and the Work Environment Act (1977:1160), Chapter 6 Sections 2 and 6a.

⁹⁰ See answer under “Mid-Level Management” in question 2.1a.



Trainees and Students

Trainees, apprentices, and students in workplace-based education are largely covered by Work Environment Act⁹¹. These groups can benefit from many of the protection mechanisms that apply to employees, although their remedy opportunities may be limited in the absence of a formal employment contract.

The ILO Convention adopts a broader approach and explicitly states that protection should extend not only to employees but also to trainees, apprentices, interns and other persons in training, regardless of their contractual status. This reflects the recognition that individuals in training positions may be particularly vulnerable to abusive conduct in workplaces⁹².

Trainees and students achieve additional protection through the Discrimination Act, which prohibits harassment and sexual harassment in education and certain work-related contexts⁹³, as well as through collective agreements, which often include provisions on workplace conduct, reporting mechanisms and procedures for handling harassment and abusive behaviour.

Self-Employed Persons and Individual Contractors

The protection for these groups is significantly weaker, as they are generally not covered by preventive obligations under the *Work Environment Act* and do not have access to forms of compensation under employment law such as damages or compensation in the event of discrimination. They are instead referred to criminal law protection against violence and threats as well as tort law rules which are subject to higher evidentiary requirements and in practice mean poorer opportunities for compensation.

Summary

Protection is strongest for people with clear employee status and progressively weaker for positions further removed from traditional employment relationships. This affects both

⁹¹ Work Environment Act (1977:1160, Chapter 1 Section 3.

⁹² ILO Convention No. 190, Article 2.

⁹³ Discrimination Act (2008:567), Chapter 2 Sections 5 and 7.



preventive protection and the possibility of legal redress for certain groups, particularly the self-employed and informal workers, who risk ending up in a more legally exposed position despite their vulnerability to violence and harassment in the work environment.

2.3 Does your country fulfil ILO Convention No. 190's obligation to protect informal economy workers against violence and harassment?

The Swedish Government Official Reports⁹⁴, concludes that Swedish law is compatible with ILO Convention and that no legislative amendments are required for ratification. However, the inquiry also acknowledges that certain groups of workers are more exposed to violence and harassment, particularly in sectors where precarious or informal work is more common. The report highlights that workers in vulnerable situations, including migrants and those with weak labour market attachment, face greater risks and often have limited access to reporting mechanisms, enforcement, and effective remedies.

Furthermore, according to the Government's assessment in Prop. 2025/26:134, Swedish law fulfills the requirements of ILO Convention, including the obligation to protect workers in both the formal and informal economy. The Convention itself explicitly states that it applies to all sectors of the economy, including the informal economy and persons working regardless of contractual status. The inquiry emphasises that the compatibility of Swedish law with the Convention must be assessed through a holistic evaluation of the overall protection system. In Sweden, protection against violence and harassment in working life is ensured through a combination of occupational health and safety law, anti-discrimination law, and criminal law. Under the Work Environment Act, employers have extensive obligations to prevent risks of ill health, including violence, threats of violence, and abusive treatment in the workplace. These preventive obligations apply broadly to the working environment and are supplemented by regulations issued by the Swedish Work Environment Authority on systematic work environment management.

⁹⁴ Swedish Government Official Reports, SOU 2021:86.



Several consultation bodies, including the Equality Ombudsman, the Institute for Human Rights, the Swedish Trade Union Confederation (LO), the Swedish Confederation of Professional Associations (Saco), and the Swedish Confederation of Professional Employees (TCO), have explicitly expressed support for ratification⁹⁵. The Swedish Agency for Government Employers largely shares the assessment that Swedish law is compatible with the Convention, but considers it uncertain whether criminal law provides protection against less serious forms of harassment to the extent required to fulfil the Convention’s requirements concerning harassment in working life⁹⁶. The Faculty of Law at Stockholm University considers the inquiry’s conclusion that Swedish law is compatible with the Convention to be incorrect and argues that ratification would require additional measures in order to strive towards the zero-tolerance vision on which the Convention is based⁹⁷.

⁹⁵ Swedish Legislation bill for the ILO Convention, Prop. 2025/26:134, p. 13.

⁹⁶ Swedish Legislation bill for the ILO Convention, Prop. 2025/26:134, p. 13.

⁹⁷ Swedish Legislation bill for the ILO Convention, Prop. 2025/26:134, p. 13.



Section III: Employer's Preventive Responsibilities

3.1 Are employers legally required to establish internal procedures for preventing and addressing workplace violence and harassment?

Yes. According to the Work Environment Act and the regulations issued by the Swedish Work Environment Authority, employers are legally obliged to work in a preventive and systematic manner to identify, assess, and address risks of violence, threats, harassment, bullying, and other forms of victimisation in the workplace⁹⁸. In addition, the Discrimination Act requires employers to take active measures to prevent harassment and sexual harassment related to protected discrimination grounds and to respond promptly and effectively when such conduct occurs⁹⁹. Although Swedish law does not always mandate a single, formally designated “anti-violence policy,” it does require employers to establish and document routines and procedures which, in practice, function as internal policies for the prevention and handling of workplace violence and harassment.

The primary legal framework is found in the Work Environment Act. According to Chapter, 3 Section 2, the employer must take all measures necessary to prevent employees from being exposed to ill health or accidents at work. This duty encompasses organisational, social, and psychosocial risks, including violence, threats, harassment, and victimisation. The provision establishes the employer’s general responsibility for ensuring a safe and healthy work environment.

Further obligations are contained¹⁰⁰, which requires employers to assess risks of violence and threats, implement preventive organisational and technical measures, and ensure that employees receive adequate information, training, and support. The regulation also requires employers to establish routines for reporting and managing incidents of violence or threats.

⁹⁸ The Work Environment Act (1977:1160) Chapter 3, Section 2.

⁹⁹ The Discrimination Act (2008:567) , Chapter 3, Section 1–3.

¹⁰⁰ Swedish Work Environment Authority’s provisions (AFS 2023:2), on Violence and Threats in the Workplace.



In addition, the Discrimination Act imposes obligations relating specifically to harassment linked to protected discrimination grounds. Under Chapter 3, Section 2–3, employers must carry out active measures to prevent discrimination, harassment, and sexual harassment in the workplace. Employers must also investigate and take appropriate measures if they become aware that an employee considers themselves to have been subjected to harassment or sexual harassment. Taken together, these provisions create a legal obligation for employers to implement internal procedures, routines, and preventive measures addressing workplace violence and harassment.

a) What do these policies typically include (e.g., reporting channels, support mechanisms, disciplinary measures)?

Policies addressing violence, threats, harassment, and victimisation in the workplace typically contain several core elements designed to ensure prevention, effective handling of incidents, and protection of those affected¹⁰¹. Workplace policies addressing harassment, threats, and violence typically include several components aimed at prevention and response. First, such policies usually establish clear reporting and safety procedures, ensuring that employees know how to report risks and incidents in the workplace¹⁰². Second, workplace policies often include procedures for investigating incidents and documenting cases of violence or threats, as employers are required to investigate and document such incidents to prevent them from occurring again¹⁰³. Third, policies typically include support mechanisms for employees exposed to threats or violence, such as guidance, supervision, or other forms of support when employees face recurring risks in their work¹⁰⁴. Finally, workplace policies include preventive safety measures, such as safety routines, alarm systems, and organisational measures designed to reduce the risk of violence or threats at work¹⁰⁵.

¹⁰¹ Arbetsgivarverket (Swedish Agency for Government Employers) “*Arbetsgivarguiden - Trakasserier*” <https://www.arbetsgivarverket.se/arbetsgivarguiden/trakasserier> (Last visited 12/03-2026)

¹⁰² Swedish Work Environment Authority’s provisions (AFS 2023:2), Chapter 5, Section 3.

¹⁰³ Ibid. Chapter 5, Section 8.

¹⁰⁴ Ibid., Chapter 5, Section 4.

¹⁰⁵ Ibid., Chapter 5, Section 3–6.



b) How are they monitored or enforced?

There are multiple ways the employer's preventive responsibilities are enforced. The first one is through the Workplace Safety Representative. Any workplace which has more than 5 workers working there has to have at least one Safety Representative which has been nominated by the workers or the union Chapter 6, Section 2 of The Work Environment Act. The Safety representative represents the workers on the matters which regard the work environment and therefore have a responsibility to make sure that the workplace has a satisfactory work environment as well as oversee the protection to prevent ill health and accidents Chapter 6, section 4, paragraph 1 of The Environment Act. They have a right to get access to documents and receive information regularly from the employer to make sure that the work place environment is satisfactory Chapter 6, section 6 of The Work environment Act. If the Safety Representative finds that the workplace environment is not satisfactory they have the ability to contact the employer to request that active measures are taken to reach a satisfactory work environment, they also have the possibility to request from the employer an investigation regarding the work environment at the workplace Chapter 6 section 6 a, paragraph 1 of The Work Environment Act. Where the Safety Representative finds Immediate danger to life and health of the employees they have the possibility to issue a work stoppage whilst an investigation is conducted by the Swedish Work Environment Authority Chapter 6, section 7 of The Work Environment Act.

3.2 Are these procedures integrated with or separate from anti-discrimination or occupational health and safety (OHS) procedures?

In Swedish law, procedures for preventing and managing violence and harassment are generally integrated into the overall work environment and work against discrimination, rather than completely separate systems. The legislation is based on employers working systematically and coherently on these issues. According to the Work Environment Act and the Swedish Work Environment Authority's regulations, employers must conduct systematic work environment work (*SAM*), where risks such as threats, violence and abusive treatment are to be identified,



prevented and managed in the same way as other work environment risks. Procedures for reporting, investigating, taking action and following up on such incidents are therefore normally included in the organisation's overall work environment policy and work environment procedures¹⁰⁶.

At the same time, the Discrimination Act requires employers to conduct special work with active measures to prevent harassment and sexual harassment linked to grounds for discrimination. In practice, this work is often coordinated with work environment work, for example through joint policies against abusive treatment, joint reporting channels and joint investigation procedures. This avoids parallel systems and creates a clearer and more accessible structure for employees¹⁰⁷.

In summary, the procedures are normally functionally integrated, although they are sometimes formally divided into different governing documents. The structure of the legislation and the supervision of the authorities encourage coordinated and systematic work rather than separate processes.

3.4 Are there any external bodies or institutions responsible for overseeing the procedures implemented at the workplace?

Yes, Sweden has several external public bodies that are responsible for overseeing how employers implement procedures related to workplace safety, violence, harassment and discrimination. The authority that is responsible for supervising workplace procedures related to violence, threats and psychological risks is the Swedish Work Environment Authority.

Situations related to discrimination, harassment linked to protected discrimination grounds and sexual harassment are supervised by the Equality Ombudsman. The Ombudsman can initiate

¹⁰⁶ Swedish Work Environment Authority's provisions (AFS 2023:2) Chapter 1 Section 2.

¹⁰⁷ Diskrimineringsombudsmannen (DO) "*Aktiva åtgärder för arbetsgivare*" <https://www.do.se/for-arbetsgivare-och-utbildningsanordnare/aktiva-atgarder-for-arbetsgivare> (Last visited 13/3-2026)



investigations, request information from employers, and bring cases before the Labour Court or general courts.

The Swedish courts also play an important oversight role. The Swedish Labour Court, the General Courts and the Administrative Court (in terms of work environmental Act related conflicts) review disputes concerning breaches of the Work Environment Act or the Discrimination Act, including cases involving employer failures to prevent or address violence and harassment. They review contributions, clarify legal standards and reinforces employer obligation through case law.

Furthermore, trade unions and employer organisations have an important oversight function within the Swedish labour market model. Trade unions can monitor workplace procedures, represent employees and initiate negotiations when employers fail to meet their obligations. Safety representatives also have formal powers including the right to demand measures.

3.5 Are workplace trainings on violence and harassment risks mandatory? If so, are they conducted jointly with OHS trainings or delivered separately?

Yes, indirectly. While Swedish law does not prescribe a specific, standalone training programme explicitly labelled as training on violence or harassment, employers are nevertheless required to ensure that both employees and managers possess sufficient knowledge and competence to prevent and manage work environment risks, including violence, threats, and harassment¹⁰⁸. Accordingly, training is mandatory in substance rather than in form, as it forms part of the employer's statutory duty under the Work Environment Act to provide adequate information, instruction, and training. This obligation extends beyond general awareness and requires that training be adapted to the risks present in the specific workplace. Managers and supervisors are subject to heightened training requirements, as they frequently carry employer-delegated responsibilities for work environment management, including risk assessment, prevention, and

¹⁰⁸ Swedish Work Environment Authority “*Violence and threats of violence*”
<https://www.av.se/en/health-and-safety/violence-and-threats-of-violence/> (Last visited: 12/03-2026)



response to incidents. In practice, training on violence and harassment is often integrated into broader occupational health and safety (OHS) or work environment training, particularly training addressing psychosocial risks¹⁰⁹. In sectors characterised by elevated risks, such as healthcare, education, social services, and transport, training on violence and threats is commonly provided as a dedicated or enhanced module, and in some cases delivered separately from general OHS training.

3.6 How are risks related to violence and harassment incorporated into OHS risk management frameworks in your legal system?

The Work Environment Act and the Discrimination Act set up a legal framework for the Employer to assess OHS risks at the workplace. Chapter 2, Section 2 of The Work environment Act states that an employer shall take any measures which are needed to eliminate any occupational health and safety risk at the workplace. The employer therefore has to on a regular basis assess and work to fulfill their duty to have a good work environment Chapter 2, section 2 a, the Work Environment Act. When the employer therefore assesses the OHS risks and looks over the adjustment they have to make, they have a far reaching responsibility to take necessary measures to prevent potential violence and harassment¹¹⁰.

The Discrimination Act states that an employer has to take active measures to prevent harassment occurrence in the workplace and follow up on the internal guidelines the company has and regularly make sure that they are sufficient Chapter 3, section 6. When setting up the guidelines it is up to every employer to make sure that policy they set up is sufficient enough to prevent harassment in the workplace. This means that there are not too many guidelines on how these policies should be in the legal framework, instead it gives the employers and employees and their union the task to agree on guidelines in cooperation Chapter 3, section 11 of The Discrimination Act.

¹⁰⁹ International Labour Organization (ILO), *Preventing and Addressing Violence and Harassment in the World of Work through Occupational Safety and Health Measures* (Geneva: ILO, 2024), pp. 10–20.

¹¹⁰ Legislative bill for Work Environmental Act, Prop. 1976/77:149, p. 252.



a) Is workplace-related violence or harassment recognized as an occupational hazard (e.g., psychosocial risk) under OHS law, and if so, how is it defined?

Workplace related violence and harassment are recognised as occupational hazards and psychological risk under the Work Environment Act, which aims to prevent ill health and accidents while promoting a satisfactory work environment¹¹¹. This legal framework requires that work organization and content be designed so that employees are not exposed to physical or mental strains that could result in injury or illness¹¹². Within this occupational health and safety context, victimization is specifically defined as actions directed against one or more employees in an abusive manner that may lead to ill health or cause them to be placed outside the social community of the workplace. Furthermore, violence and threats are recognized as significant hazards, encompassing a broad range of behaviors from physical assault to threats made via telephone or correspondence. Employers bear the primary responsibility to systematically plan, lead, and control their operations, which involves identifying hazards, assessing risks, and implementing measures to ensure the environment is, as far as possible, free from violence and harassment¹¹³. This protective duty is comprehensive and includes managing risks arising from third parties, such as customers, clients, or patients, to ensure that the organizational and social work environment remains safe for all workers.

b) Are incidents of workplace violence or harassment recognized under OHS law as occupational accidents or work-related diseases?

Yes, under certain conditions, violence, threats, and harassment in the workplace may give rise to legal recognition as occupational injuries¹¹⁴. Acts of violence or threats occurring in connection with work can be classified as occupational accidents, even where the harmful conduct is carried out by third parties such as clients, patients, or customers. The decisive factor is the existence of

¹¹¹ Work Environment Act (1977:1160), Chapter 1, Section 1–2.

¹¹² Ibid., Chapter 3, Section 2.

¹¹³ Work Environment Act (1977:1160), Chapter 3.

¹¹⁴ Swedish Social Insurance Code (2010:110), Chapters 39–42.



a sufficient connection between the incident and the performance of work duties¹¹⁵. In addition, work related diseases may be recognised where psychological injuries, such as stress reactions, anxiety disorders, or post-traumatic stress disorder (*PTSD*), result from harassment, bullying, or violence in the workplace¹¹⁶. Recognition requires that a clear causal link between the working environment and the psychological harm can be established. Incidents of this nature must be reported to the Swedish Work Environment Authority and may trigger several legal consequences. These include an obligation on the employer to investigate the incident and implement measures to prevent recurrence, as well as the possibility of compensation under the occupational injury insurance system.

c) Please describe if relevant:

i) the legal criteria for qualifying workplace violence or harassment as occupational accidents or work-related diseases;

For something to qualify as an occupational accident or work-related diseases it has to be because of harmful effects at work as well as the accident having been caused by predominant reasons that speak for it, Chapter 39, section 3 of the Swedish Social Insurance Code (2010:110). Another important legal criteria for something to be seen as an occupational accident or work-related diseases is that is a personal injury, Chapter 39, section 4 of the Social Insurance Code.

These two criterias are what is taken into consideration to determine whether or not something can be qualified as an occupational accident or work-related diseases because of workplace violence or harassment. This means that every case has to be judged and determined by these criterias.

¹¹⁵ Ibid. Chapter 39, Section 3.

¹¹⁶ World Health Organization, “*Mental health at work*” (2024) <https://www.who.int/news-room/fact-sheets/detail/mental-health-at-work> (Last visited 12/03-2026)



ii) the employer's duties to prevent, report, investigate and record the event;

If occupational accidents or work-related diseases work where to occur the employer has a certain responsibility to report the event but has a far more reaching internal responsibility to investigate it. The employer has a responsibility to investigate any accidents which were to occur regardless of how severe the accident is and take the necessary precautions to prevent it in the future¹¹⁷. An employer therefore does not have a responsibility to report every accident that occurs to the Work Environment Authority but accidents of a more serious nature have to be reported to them Chapter 3, section 3 a of the Work Environment Act. That includes severe personal injuries, death at the workplace or if multiple people have been injured.

iii) victims' access to benefits, compensations, rehabilitation, support or insurance schemes.

The victim depending on the circumstance may be entitled to work injury sick pay, to be able to qualify for that the victim has to show that they have lost income due to not being able to work Chapter 40, section 4, and 5 of The Social Insurance Code.

Other than work injury sick pay the victim may be entitled to compensation for harassment from their employer if they fail to fulfill their duties to address harassment in the workplace, chapter 5, section 1 of the Discrimination Act. It's important to note that an individual employee can only get compensation through the Discrimination Act and not the Work Environment Act.

The employer may also have a responsibility to help the victim in its rehabilitation back to work. If an employee is expected to be on sick leave or have a reduced ability to work due to illness or injury for more than 60 days the employer has a responsibility to help put forward a plan to help the employee back to work, Chapter 30, Section 6 of The Social Insurance Code. This is not limited to just cases where the employee is on sick leave due to an incident from harassment or a work-related disease, instead this is a far more reaching responsibility to aid any employee who is on sick leave or has reduced capabilities to work.

¹¹⁷ Swedish Work Environment Authority's provisions (AFS 2023:1), 12 §.



Section IV: Protection, Remedies, and Confidentiality

4.1 What forms of protection either under anti-discrimination or OHS regulations are at the disposal of victims of violence at work?

The Work Environment Act and the provisions issued by the Swedish Work Environment Authority provide strong and direct protection for employees who are exposed to violence or threats of violence at work. Under Chapter 3, Section 2 of the Work Environment Act, the employer bears the primary responsibility for taking all measures necessary to prevent employees from being exposed to ill health or accidents. According to Chapter 5, Section 8 of the Swedish Work Environment Authority's provisions (AFS 2023:2), incidents involving violence or threats of violence must be documented and investigated. Section 11 further stipulates that employees who have been subjected to violence or threats of violence shall receive prompt assistance and support in order to prevent or alleviate both physical and psychological harm. The employer must have specific procedures in place to ensure this. Pursuant to Chapter 3, Section 2a of the Work Environment Act, the employer shall systematically plan, direct and control the operations so that the work environment meets the statutory requirements. This includes investigating occupational injuries, continuously assessing risks in the undertaking, and implementing the measures required as a result of such assessments. The employer must also ensure that there is a properly organised system for work adaptation and rehabilitation.

The rules on work-oriented rehabilitation are supplemented by the Social Insurance Code. According to Chapter 29, Section 2 of the Social Insurance Code, rehabilitation measures shall aim to enable an insured person who has suffered from illness or injury to regain their work capacity and to support themselves through gainful employment. Under Chapter 3, Section 4 of the Work Environment Act, employees are required to participate in work environment management. However, they also have the right to interrupt their work in the event of a serious and immediate danger to life or health. In addition, under Chapter 6, Section 7 of the same Act, a safety representative may order a work stoppage in such circumstances. In practice, this means



that an employee who has been exposed to a dangerous situation is not obliged to continue working.

The system of the Work Environment Act also entails protection against reprisals. Since employees have a duty to report risks and incidents, the employer may not subject them to negative consequences for doing so. Further protection against retaliation is provided by the Whistleblowing Act¹¹⁸.

Protection for victims of workplace violence may also follow from the Discrimination Act. Under Chapter 2, Section 3, the employer is obliged to investigate and take measures when becoming aware that an employee considers themselves to have been subjected to harassment or sexual harassment. If the employer fails to fulfil this obligation, the employee may be entitled to discrimination compensation pursuant to Chapter 5, Section 1 of the Discrimination Act.

If the behaviour constitutes a criminal offence, such as assault, unlawful threats, or harassment¹¹⁹, it may give rise to criminal liability. The offender may then be sentenced to criminal penalties, including fines or imprisonment according to the Swedish Penal Code.

The employer has a responsibility to prevent and manage risks of violence, threats and offensive discrimination through systematic work environment management¹²⁰. Failure to fulfil these obligations may in serious cases lead to criminal liability for work environment offences under the Swedish Penal Code¹²¹.

¹¹⁸ The Whistleblowing Act (2021:890), Chapter 3 Section 1.

¹¹⁹ Swedish Penal Code, Chapter 3 Section 5, Chapter 4 Sections 5 and 7.

¹²⁰ Work Environment Act (1977:1160), Chapter 3, Sections 2 and 2a.

¹²¹ Swedish Penal Code (1962:700), Chapter 3, Section 10



4.2 What types of legal claims or remedies are available to victims of workplace violence and harassment in your jurisdiction (e.g., compensation, reinstatement, penalties against perpetrators)?

Under the Discrimination Act, a victim of harassment or sexual harassment linked to a protected ground of discrimination may claim discrimination compensation¹²². This compensation serves both a compensatory and a preventive function and may be awarded regardless of whether the victim can prove economic loss. If an employer fails to fulfil the duty to investigate and take measures against harassment (Chapter 2, Section 3 of the Act), the employer may also be ordered to pay discrimination compensation.

Second, the Work Environment Act establishes preventive obligations for employers to ensure a safe working environment. Compliance with these obligations is supervised by the Swedish Work Environment Authority, which may issue injunctions or prohibition orders, sometimes combined with administrative fines, if employers fail to address risks of violence or harassment in the workplace (e.g. Chapter 7 section 7 of the Work Environment Act)¹²³.

Where the conduct constitutes a criminal offence, such as assault (Chapter 3, Section 5 of the Penal Code), unlawful threats (Chapter 4, Section 5), or molestation (Chapter 4, Section 7), criminal proceedings may be initiated. In criminal cases, perpetrators may face criminal penalties, including fines or imprisonment. The victim may also claim damages within the criminal proceedings for personal injury, pain and suffering, or violation of personal integrity.

Trade unions may bring claims on behalf of members before the Labour Court, the General Court or the Administrative, which lowers procedural barriers for victims. In discrimination cases, the Equality Ombudsman may also initiate proceedings.

¹²² Swedish Legislative bill for the Discrimination Act, Prop. 2007/08:95 pp 387 ff; Diskrimineringsombudsmannen (DO) (2025) (the Equality Ombudsman) “*Du kan få ersättning om du blivit diskriminerad*” [“Du kan få ersättning om du blivit diskriminerad | DO](#) (Last visited 24/2-2026)

¹²³ Swedish Government Official Reports, SOU 2021:86, pp. 57-58.



4.3 How does your national legal system protect victims of workplace violence and harassment from retaliation by employers or other individuals involved?

Sweden's national legal system provides a strong and structured protection for victims of workplace violence and harassment, particularly by making retaliation unlawful and placing clear responsibilities on employers to prevent harm. The foundation of this protection lies in the Work Environment Act, which treats both physical violence and psychological harassment as serious workplace risks and requires employers to take systematic preventive measures¹²⁴.

Employers are legally required to investigate reported incidents promptly and take concrete action to stop further harm, regardless of whether the abuse comes from managers, coworkers, or third parties such as customers or clients. Oversight and enforcement are carried out by the Swedish Work Environment Authority, which has statutory powers to inspect workplaces, issue binding improvement orders, impose fines, and suspend unsafe operations where necessary. Failure to address reported violence or subjecting a worker to negative consequences for reporting can therefore constitute a direct breach of work environment law.

When harassment or violence is linked to protected characteristics such as gender, ethnicity, religion, disability, sexual orientation, or age, the Swedish Discrimination Act provides an additional and explicit prohibition against both harassment and victimisation. In these situations, employers are under a duty not only to stop the discriminatory conduct, but also to ensure that complaints and witnesses are not subjected to reprisals. Such enforcement is led by the Equality Ombudsman, which has the authority to investigate complaints, represent individuals in court, and seek financial compensation from employers who violate the law.

A further safeguard within the Swedish system is the legally protected role of workplace safety representatives, who are commonly appointed through trade unions under the Work Environment Act. Employees may themselves appoint a safety representative, ensuring that workers are represented in occupational health and safety matters (Chapter 6, Section 2 of the Work

¹²⁴ Work Environment Act (1977:1160), Chapter 3.



Environment Act). These representatives may demand corrective measures from employers, contact regulatory authorities directly, and in cases of immediate danger temporarily halt work activities¹²⁵. Their strong protection from retaliation ensures that risks related to violence and harassment can be raised collectively rather than placing the burden solely on individual workers.

In summary, these legal mechanisms illustrate Sweden's comprehensive approach to protecting victims of workplace violence and harassment. The system emphasises prevention through employer responsibility, strong regulatory oversight, explicit bans on retaliation, and accessible avenues of compensation. By making reprisals unlawful and enforceable in court, Swedish law seeks to ensure that reporting abuse strengthens workplace safety rather than exposing victims to further harm.

4.4 What legal safeguards are in place to protect the privacy and confidentiality of victims throughout the reporting and investigation process?

Within the Swedish legal system the victim is protected throughout the process by the Whistleblower Act (2021:890). The Act is not only applicable to the victim of a workplace incident but also to any person who reports on poor conditions or harassment in the workplace. This means that anybody who is employed by any organisation either public or private is protected by the act. The act is set up in such a way that means reporting on poor conditions or harassment can be done to both their employer or the Swedish Work Environment Authority and still be able to receive the same kind of protection under the act.

The act provides protection for both the one reporting harassment or any individual who might be involved in the incident being investigated from having their identity revealed Chapter 9, section 1, the Whistleblower Act. The protection is set up in such a way that the one who is handling the investigation has an obligation in making sure that the personal information of the

¹²⁵ Work Environment Act (1977:1160), chapter 6.



people involved does not get compromised. This does not only extend to just the employer where the incident might have happened but also any third party involved who are a part of the process¹²⁶.

The privacy in the Whistleblower Act only applies in the private sector. Instead in the public sector the privacy of the individual is regulated in the Public Access to Information and Secrecy Act (2009:400). The Act gives the same kind of protection as the Whistleblower Act is regulated in the same way, with the only difference being that it applies to the individuals who are reporting incidents which have happened on a workplace in the public sector Chapter 17, section 3 b of the Public Access to Information and Secrecy Act.

4.5 Do workers have the right to remove themselves from a work situation where there is a reasonable justification to believe that the environment presents an imminent and serious danger to their life, health, or safety due to violence or harassment? If so, are they protected from retaliation or other adverse consequences, and what obligations do they have in informing management?

Under Chapter 3, Section 4 of the Work Environment Act, employees are required to participate in work environment management, but they also have the right to interrupt their work in the event of a serious and immediate danger to life or health. In addition, under Chapter 6, Section 7 of the same Act, a safety representative may order a work stoppage in such circumstances. In practice, this means that an employee who is exposed to violence or a threatening situation is not obliged to continue working.

Employees are also protected against victimization. Since they are required to report risks and incidents as part of their participation in the work environment under Chapter 3, Section 4 of the Work Environment Act, the employer may not subject them to negative consequences for doing

¹²⁶ Swedish Legislative bill for the Prevention of Violence in Intimate Relationships. Prop. 2020/21:193 *Förebyggande av våld i nära relationer*, p. 225.



so. Further protection against retaliation is provided by the Whistleblower Act in Chapter 3, Section 1.

Further protection against victimization is provided by the Discrimination Act. Under Chapter 2, Section 18, an employer is prohibited from subjecting an employee to retaliation because the employee has reported or raised a complaint that the employer has acted in breach of the Act, participated in an investigation under the Act, or rejected or submitted to harassment or sexual harassment. This protection also applies to job applicants, trainees, and agency workers. A person who, in the employer's place, has the authority to make decisions concerning such individuals is equated with the employer.

According to Chapter 5, Section 1 of the Discrimination Act, a person who infringes the prohibitions against retaliation, shall pay discrimination compensation for the violation that the infringement entails and compensation for the financial loss that arises. However, this does not apply to losses arising from decisions concerning employment or promotion. Nor does it apply to losses arising from discrimination in the form of lack of accessibility.

According to chapter 5 section 2 of the Discrimination Act, if an employee discriminates against or subjects someone to reprisals within the following areas: labour market policy activities and employment services not carried out under a public mandate; the starting or running of a business and access to professional qualifications; membership of certain organisations; health and medical care and social services; the social insurance system, unemployment insurance and student financial aid; compulsory military service, civil defence service or equivalent military training within the Swedish Armed Forces; or public employment, the employer is liable to pay discrimination compensation. A person who performs work on behalf of another under conditions comparable to those of an employment relationship shall be equated with an employee.



Section V: Domestic, Third Party and Cyber Violence and Work Implications

5.1 Does your legal system acknowledge domestic violence affecting the workplace, and if so, how?

Yes. Although domestic violence is not regulated as a separate labour law category in Sweden, the legal system increasingly acknowledges that violence in close relationships may have significant implications for working life and therefore must be addressed within existing legal frameworks¹²⁷. The employer may therefore need to assess whether work adaptation measures are required. Chapter 2, Section 1 of the Work Environment Act contains a general provision on work adaptation, stating that working conditions shall be adapted to people's different physical and psychological capacities. Furthermore, pursuant to Chapter 3, Section 3 of the Act, the employer must take the employee's particular circumstances into account by adapting working conditions or taking other appropriate measures. In addition, under Chapter 3, Section 2c of the Work Environment Act, the employer must ensure that employees have access to occupational health services to the extent required by the working conditions.

As mentioned in section 1 question one the Swedish Government has launched a broad action programme to prevent and combat violence, including violence in close relationships (violence in intimate and domestic settings), oppression, and exploitation¹²⁸. As part of this programme, the Government has emphasised the need to strengthen employers' ability to recognise and respond to signs that an employee may be subjected to violence in a close relationship and to integrate such awareness into the workplace environment and preventive work. Specifically, in December 2024 the Government granted support to the Swedish Association of Local Authorities and Regions (SKR) to help employers detect domestic violence or honour-related violence and oppression affecting employees and to develop appropriate workplace responses and support systems.

¹²⁷ Swedish Government Official Reports, SOU 2021:86, pp, 251-252.

¹²⁸ Regeringskansliet (2026) (the Government) "*Frihet från våld, förtryck och utnyttjande*" <https://www.regeringen.se/artiklar/2026/01/frihet-fran-vald-fortryck-och-utnyttjande/> (Last visited 12/3-2026)



This initiative recognises that domestic violence can spill over into the workplace and negatively affect employees' health, safety, and ability to work. By strengthening employers' capacity to identify such situations, and by providing guidance and tools for appropriate action, the Government aims to ensure that violence in close relationships is not overlooked in occupational health and safety management.

a) What obligations do employers have in recognizing and managing the workplace impact of domestic violence?

As mentioned in the earlier question, under the Work Environment Act, employers have a general duty to prevent risks of ill health and accidents at work. This duty includes psychosocial risks.¹²⁹ If domestic violence affects an employee's health, safety, or ability to work, the employer must consider whether the situation gives rise to work environment risks that require action. This may include conducting risk assessments, taking preventive measures, and integrating the issue into systematic work environment management.

The Act also contains specific provisions on work adaptation¹³⁰. Working conditions must be adapted to employees' physical and psychological capacities (Chapter 2, Section 1). Furthermore, under Chapter 3, Section 3, employers must take into account the employee's particular circumstances by adapting working conditions or taking other appropriate measures. Employers must also ensure access to occupational health services where required by working conditions (Chapter 3, Section 2c).

b) What specific workplace entitlements or protections are provided to victims of domestic violence (e.g., leave policies, workplace adjustments)?

In Sweden, there is no single standalone statute that creates a specific category of "domestic violence leave", but victims are nevertheless protected through a combination of labour law,

¹²⁹ Swedish Government Official Reports, SOU 2021:86, pp, 251-252.

¹³⁰ Ibid.,



social insurance, anti-discrimination laws, and employers duties to adapt working conditions. Together, these mechanisms aim to ensure that individuals experiencing domestic violence can remain in employment without being penalised for the consequence of abuse. Workers who are unable to perform their duties because of physician injury, psychological trauma, or stress related to domestic violence are entitled to sick leave on the same basis as any other illness or injury¹³¹. During this period, income replacement is provided partly by the employer and then through the national social insurance system administered by the Swedish Social Insurance Agency, which covers sickness benefits and rehabilitation support¹³². This allows victims time to recover, attend medical appointments, engage with support services, or relocate without immediately risking job loss or financial collapse.

Furthermore, many Swedish collective bargaining agreements supplement national law by providing additional paid leave for medical treatment, crisis support, or social emergencies, and some sectors have begun explicitly recognizing domestic violence as grounds for special leave or workplace adjustments. While not universal, these agreements significantly expand practical protection for many workers.

Overall, Sweden's approach focuses on creating a separate legal category for domestic violence victims and more on integrating protection into existing health, safety, and welfare systems. Through access to paid sickness benefits, mandatory workplace adaptations, protection from adverse treatment, and enhanced rights in collective agreements, such as provisions allowing paid leave for urgent personal matters (*permission* or leave for urgent personal matters) and flexible working arrangements commonly found in Swedish collective bargaining agreements, victims are supported in maintaining both their safety and their employment stability.

¹³¹The Sick Pay Act (1991:1047).

¹³² Social Insurance Code (2010:110)



5.2 Does your jurisdiction recognize cyber violence (internet-based harassment) within workplace regulations? Specify existing measures.

The Swedish legal system does not directly recognize cyber violence as a separate form of jurisdiction. Instead the harassment done over the internet is included in the wider harassment definition in the Discrimination Act and as well as the work environment act. This means any kind of harassment done over the internet can be considered cyber violence as long as the prerequisites for harassment is fulfilled. So Sweden does not directly recognize cyber violence it is included it is instead seen as harassment in the same way as if it had been done at the workplace and with no legal separation between the form in which it is done.

5.3 Are employers required to have preventive measures against cyber violence? Provide some details.

Yes. Employers in Sweden are obliged to work preventively also against cyberviolence, since it is considered part of the work environment risks if it is related to the workplace¹³³. There are no provisions in Swedish work environment law or discrimination law that explicitly uses the term “cyberviolence”.

5.4 In what ways does your legal system protect workers from violence perpetrated by third parties?

Swedish law recognises that violence and harassment in working life may be committed by third parties, such as clients, patients, customers, students, or members of the public. Protection against such violence is primarily ensured through occupational health and safety legislation, complemented by criminal law.

¹³³ See answer to question 5.2 above.



Under the Work Environment Act, employers have a general duty to prevent ill health and accidents at work. The scope of the Work Environment Act is somewhat unclearly defined regarding third parties because there is no explicit provision addressing violence perpetrated by third parties¹³⁴. However, the investigation shares the Swedish Work Environment Authority's view that the employer's responsibility under Chapter 3 of the Work Environment Act also applies in relation to third parties.

Consequently, the requirement for employers to systematically assess risks within their operation, as stipulated in Chapter 3, Section 2 a of the Work Environment Act, is considered to encompass violence and harassment perpetrated by third parties. Employer obligations in this regard can involve organizing work so that personnel are not exposed to harmful psychological strain, which various forms of harassment can lead to. Under the same provision, the employer must, to the extent the business requires, document the work environment and the efforts to manage it, which includes establishing action plans.

5.5 Does your national labour law framework explicitly recognise violence or harassment perpetrated by individuals other than employers or colleagues (e.g. clients, customers, patients, passengers, students, service users or platform users)?

Yes, Sweden's labour law framework explicitly recognises that workplace violence and harassment can be perpetrated not only by employers or colleagues, but also by third parties such as clients, customers, patients, students, passengers, and service users. Rather than limiting responsibility to internal employment relationships, Swedish law treats any work-related risk to health and safety as falling within the employer's preventive duty. The employers are required to ensure a safe working environment against both physical and psychological harm, regardless of the source of that harm. Swedish legal interpretation and regulatory practice make clear that threats, violence, bullying, and abusive conduct by external individuals are considered workplace

¹³⁴ Swedish Government Official Reports, SOU 2021:86, pp. 49–50.



risks when they occur in connection with work tasks or within the workplace¹³⁵. This is particularly relevant in sectors such as healthcare, education, public transport, retail, and social services, where workers regularly interact with the public.

a) Is there a distinction made in your legal system between third-party violence and domestic violence?

Domestic violence is regulated in Chapter 4, section 4 a in the Swedish penal code and is separated into two different forms. The first one is domestic violence done by next of kin of the victim, the other one is when the domestic violence is done by a man towards a woman which he is either married to or in a close relationship with. For something to qualify as domestic violence in Chapter 4, section 4a in the Swedish penal code it has to be done in combination with other crimes such as assault, in Chapter 3, section 5 or defamation in Chapter 5, section 1 in the penal code.

Therefore the Swedish legal system makes a distinction between third party violence and domestic violence but for something to qualify as it it has to be based on other crimes and been perpetrated by somebody close to the victim.

b) Are employers required to assess and manage risks arising from interactions with third parties? (e.g. risk assessments, workspace design, panic alarms, training, refusal of service)

Yes. Under Chapter 3, Section 2a of the Work Environment Act and the provisions on systematic work environment management (AFS 2023:2), employers are required to continuously investigate working conditions, assess risks and implement the measures necessary to prevent ill health and accidents. This obligation also covers risks arising from contacts with third parties. The risk assessment must be documented where the risks are significant and followed by an

¹³⁵ Swedish Work Environment Authority, “*Violence and threats of violence*” <https://www.av.se/en/health-and-safety/violence-and-threats-of-violence/> (Last visited 12/03-2026)



action plan¹³⁶. Depending on the nature of the activity, preventive measures may include the design and organisation of the workplace, alarm systems or other technical safety devices, appropriate staffing arrangement, training for employees and clear safety routines for handling threatening situations¹³⁷.

¹³⁶ Swedish Work Environment Authority's provisions (AFS 2023:2), Chapter 5 Sections 3 and 8.

¹³⁷ Ibid. Chapter 5 Sections 3,6 and 7.



Section VI: Roles and Responsibilities of Third Parties in counteracting violence at workplaces

6.1 What are the specific roles and responsibilities of trade unions, workers' representatives, NGOs, in preventing and addressing workplace violence and harassment

In Sweden, the prevention and handling of workplace violence and harassment is not left solely to employers or state authorities. Trade unions, workers representatives, and civil society organisations play an institutionalised and legally recognised role within the labour law framework. Their involvement reflects the broader Swedish model of industrial relations, which is built on collective bargaining, co-determination, and strong employee representation.

Trade unions have a central function in both prevention and enforcement. Unions have the right to information and consultation on matters affecting employees working conditions, including health and safety risks¹³⁸. This enables unions to negotiate preventive policies on violence and harassment, demand risk assessments, and raise concerns before problems escalate. In practice, many collective bargaining agreements contain additional provisions addressing psychosocial risks, reporting procedures, and employer obligations that go beyond statutory minimum standards. When incidents occur, unions often represent individual members in disputes, assist in negotiations with employers, and if necessary, bring cases before the Labour Court.

A particularly important role is played by safety representatives, who are usually appointed by trade unions under the Work Environment Act, these representatives have legally protected authority to monitor workplace safety, request corrective measures, and access relevant documentation. If any employer fails to address serious risks, safety representatives may escalate the matter to the Swedish Work Environment Authority. In situations involving immediate and serious danger, they may even halt work temporarily. Their protection against retaliation ensures

¹³⁸ Lag 1976:580) om medbestämmande i arbetslivet, Co-Determination in the Workplace Act (1976:580)



that concerns about violence and/or harassment can be raised collectively, reducing the burden on individual victims.

Workers representatives also contribute through participation in systematic work environment management, which requires ongoing risk assessment and preventive planning. In cases involving harassment linked to discrimination, unions frequently support victims in proceedings under the Discrimination Act and may cooperate with the Equality Ombudsman when legal enforcement is necessary.

In addition to labour market actors, certain public authorities play complementary roles in monitoring and promoting compliance with human rights and equality standards. The Swedish Gender Equality Agency has a coordinating role in implementing Sweden's national gender equality policy. The agency develops knowledge, guidance, and policy support related to gender-based violence and sexual harassment, including in working life. Through research, policy development, and cooperation with public authorities and labour market actors, it contributes to preventive strategies addressing harassment and violence in workplaces¹³⁹.

Furthermore, the Swedish Institute for Human Rights has a statutory mandate to monitor and analyse Sweden's compliance with international human rights obligations. Although the institute does not adjudicate individual labour disputes, it evaluates whether Swedish legislation, policy, and practice effectively protect fundamental rights, including protection against discrimination, harassment, and violence. Through reporting, recommendations, and dialogue with authorities and society, the institute contributes to strengthening accountability and the human rights framework relevant to working life.

Non-governmental organisations (NGOs) play a complementary but important role. While they do not usually have formal enforcement powers within the labour law, NGOs provide advocacy,

¹³⁹Jämställdhetsmyndigheten (The Swedish Gender Equality Agency) "*Fakta om jämställdhet*" <https://jamstalldhetsmyndigheten.se/fakta-om-jamstalldhet/> (Last visited 12/3-2026)



legal advice, crisis support, and public awareness campaigns. Organisations working on gender equality, migrant rights, or victims support often assist individuals who may be reluctant to report violence through workplace channels. They also influence legislative development by participating in consultations, producing research, and drawing attention to systemic problems such as sexual harassment or abuse in precarious sectors.

Overall, Sweden's framework distributes responsibility across multiple actors. Employers carry the primary legal duty to prevent violence and harassment, but trade unions and safety representatives have strong statutory authority to monitor compliance and intervene. NGOs strengthen the system by offering independent support and advocacy. This multi-layered structure reflects the Swedish labour model, in which workplace protection is achieved through cooperation between state regulation, collective representation and civil society engagement.

6.2 What functions do these third-party actors have with respect to monitoring, supervision, policy development, awareness-raising, and support for victims.

As previously explained, labour unions play an important role as a third party actor within the Swedish labour model. The function of the unions is therefore to meet the interest of the members¹⁴⁰. This means that the unions have an interest in making sure that their members' interests are met in the workplace and the members have a good work environment. The unions therefore have multiple ways of making sure that the members' interests are met.

When the employer has a collective bargaining agreement the local unions are the ones who choose the safety representatives at the workplace who are able to monitor and supervise the working conditions at the workplace Chapter 6, section 2 of the Work Environment Act. This gives the union an important function in being able to monitor the workplace and prevent harassment.

¹⁴⁰ Källström, K. Malmberg, J. Öman, S. Johansson, C. *Den kollektiva arbetsrätten* p. 28, 4th edition, Iustus förlag, 2025



Another option the unions have is the legal right to negotiate with the employer regarding situations and changes the company wants to do at the workplace through the Co-Determination in the Workplace Act. This gives the unions an option to be able to contribute and give their input on policy development at the employer.

An example of this can be found in the bylaws of the largest unions in Sweden called Unionen. In section 1.2 of their bylaws they explain what their main goals and tasks are, which states that their goal is to make sure that their members' economic, social and professional interests are protected and guarded. This means that the unions take a broad responsibility to make sure that their members' interest are taken care of in all situations which includes supporting victims of harassment¹⁴¹.

6.3 What authority do labour inspectorates or other competent authorities (eg. equality bodies, regulatory agencies) have in the context of violence and harassment at work? Please describe the relevant powers and responsibilities of competent authorities that exist in your legal system for addressing workplace violence and harassment.

In Sweden, the primary authority responsible for supervising compliance with occupational health and safety legislation, including risks related to violence and harassment at work, is the Swedish Work Environment Authority¹⁴². In matters concerning discrimination and harassment linked to the discrimination grounds, the Equality Ombudsman is the competent supervisory body¹⁴³. Another relevant public body is the Swedish Gender Equality Agency. Although it does not exercise direct supervisory powers over workspaces, it plays an important role in coordinating national policies on gender equality, including efforts to combat men's violence against women, domestic violence and honor-related violence. The agency develops guidelines

¹⁴¹ Bylaws, The Swedish Union of Private Sector Employees. (Unionen) 2023

¹⁴² Swedish Work Environment Act (1977:1160), Chapter 7 Section 1.

¹⁴³ Discrimination Act (2008:567), Chapter 4 Section 1.



and support material that can assist employers and public authorities in identifying and addressing violence that may affect employees¹⁴⁴.

The Swedish Work Environment Authority

The Swedish Work Environment Authority exercises supervision under the Work Environment Act and has extensive regulatory and enforcement powers.

The Authority is responsible for ensuring that employers comply with the Act and with regulations issued pursuant to it¹⁴⁵. As part of this supervisory function, the Authority may carry out inspections of workplaces. The Authority has the power to issue: improvement notices (förelägganden), requiring the employer to remedy deficiencies, and prohibition notices (förbud), which may prohibit certain work or the use of premises, machinery or working methods where there is a risk of ill health or accidents. Such decisions may be combined with a conditional fine (vite)¹⁴⁶.

The Authority also has the power to issue provisions, for example The Swedish Work Environment Authority's regulations and general advice (AFS 2023:2) on planning and organising work environments. Furthermore the Authority has a right of access to workplaces and may request documents and information necessary for supervision¹⁴⁷. Certain breaches of the Work Environment Act and of regulations issued under it may lead to penal sanctions and the Authority may report violations to the police or the public prosecutor¹⁴⁸.

The Equality Ombudsman (DO)

In cases involving harassment or sexual harassment related to the discrimination grounds, supervision is exercised by the Equality Ombudsman under the Discrimination Act.

¹⁴⁴ Regulation (2017:937) with instructions for the Swedish Equality Authority, Sections 1-4.

¹⁴⁵ Swedish Work Environment Act (1977:1160), Chapter 7 Section 1.

¹⁴⁶ Swedish Work Environment Act (1977:1160), Chapter 7, Section 7.

¹⁴⁷ Ibid. Chapter 7, Section 3.

¹⁴⁸ Ibid. Chapter 8



The Equality Ombudsman is responsible for supervising compliance with the Act¹⁴⁹. Within this framework, the DO may: request information from an employer¹⁵⁰, and order an employer, under penalty of a conditional fine, to fulfil its obligations to investigate and take measures against harassment or sexual harassment, as well as to carry out active measures¹⁵¹. The DO may also bring an action before the Labour Court on behalf of an individual and claim discrimination compensation¹⁵².

Other relevant authorities

Where the conduct constitutes a criminal offence, such as assault or unlawful threats, the matter falls within the competence of the Police Authority and the public prosecutor, in accordance with the Swedish Penal Code and the Code of Judicial Procedure.

6.4 Can these authorities issue binding orders, including orders of immediate executory force or stop-work orders, in cases involving imminent threats to life, health, or safety resulting from violence or harassment?

The Swedish Work Environment Authority is the central supervisory body and possesses extensive powers to address deficiencies. It can issue orders or prohibitions to ensure compliance with the Work Environment Act or its associated regulations¹⁵³. These decisions can be mandated to have immediate effect, meaning they must be followed even if they are appealed. To ensure compliance, these orders are often combined with a contingent fine, an economic sanction imposed if the employer fails to rectify the situation.

A unique and powerful mechanism in the Swedish system is the safety representative's right to stop work. If a certain task involves an immediate and serious danger to an employee's life or health, and a remedy cannot be reached by addressing the employer, the safety representative can

¹⁴⁹ Discrimination Act (2008:567), Chapter 1 Section 1.

¹⁵⁰ Ibid. Chapter 4 Section 3.

¹⁵¹ Ibid. Chapter 4, Sections 4-5.

¹⁵² Ibid. Chapter 6, Section 2.

¹⁵³ Swedish Government Official Reports, SOU 2021:86, pp, 57–58.



decide that the work must be suspended¹⁵⁴. Such a work stoppage remains in effect until the Work Environment Authority has evaluated the situation and made a formal decision. Safety representatives also have the power to stop work performed by an employee alone if it is deemed necessary from a safety perspective

The Equality Ombudsman also has tools to ensure compliance with the Discrimination Act. The DO can issue an order combined with a contingent fine to compel an employer to provide information or grant access to a workplace for investigations. Regarding the prevention of harassment, if an employer fails to conduct the required "active measures" (such as implementing anti-harassment guidelines), the DO can petition the Board against Discrimination, which has the authority to issue a vitesföreläggande (an order with a contingent fine)

¹⁵⁴ Swedish Government Official Reports, SOU 2021:86, pp 57 and 187.



Section VII: Implementation Challenges and Good Practices

7.1 Identify the main challenges your jurisdiction faces in implementing legal, institutional, or workplace-level measures to prevent and address violence and harassment at work. Consider challenges such as lack of enforcement, low awareness, insufficient training, underreporting, or resistance from employers. Other challenges can be the lack of access to justice mechanisms, such as short prescription periods, no access to legal aid or legal counsel, etc.

One major challenge is inconsistent enforcement capacity. While the Swedish Work Environment Authority has broad legal authority to inspect workplaces and impose corrective measures, its resources are limited relative to the number of workplaces it oversees. Inspections tend to prioritise high risk physical risks such as construction safety, meaning psychosocial risks like harassment, threats, and violence often receive less systematic inspection. As a result, many employers comply formally with risk assessment requirements but fail to implement meaningful preventive measures, particularly in sectors such as healthcare, retail, education, and social services where third-party violence is common¹⁵⁵.

A second major issue is underreporting. Despite the strong legal protection against retaliation, many workers remain reluctant to report harassment or violence¹⁵⁶. Fear of being labelled difficult, damaging career prospects, or worsening workplace relationships continue to discourage complaints, especially in small workplaces or precarious employment situations. Migrant workers, young workers, and platform based workers are particularly vulnerable, as they may lack union support, job security, or knowledge of their rights. Psychological harassment and

¹⁵⁵ International Labour Organization (2020). “*Improving Occupational Safety and Health in Small and Medium-Sized Enterprises*. Geneva: ILO.”, pp. 10–11.
https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_dialogue/@lab_admin/documents/publication/wcms_792038.pdf (Last visited 12/03-2026)

¹⁵⁶ Diskrimineringsombudsmannen, “*Förekomst av diskriminering 2025 – Årlig rapport från Diskrimineringsombudsmannen*” Report 2025:3.,
<https://www.do.se/download/18.75d38bb319abac8075f14/1764132775530/rapport-forekomst-av-diskriminering-2025.pdf>, p. 23.



low level threats are especially underreported, even though they can cause serious long term harm.

Low awareness and insufficient training also weaken prevention efforts. Although employers are legally required to work systematically with workplace risks, many managers lack adequate training in recognising psychosocial risks or handling harassment complaints appropriately. In some workplaces, particularly in healthcare or service settings, violence and abusive behaviour from customers, patients, or service users may be normalised and perceived as “part of the job,” which can lead to trivialisation of incidents and reduce the likelihood that they are formally reported or addressed¹⁵⁷.

Access to justice presents further difficulties. While Sweden allows victims to seek compensation through labour courts or civil proceedings, the process can be lengthy, expensive, and legally complex¹⁵⁸. Workers who are not union members may struggle to obtain legal representation, as unions often provide the primary route to legal support in labour disputes. The complexity of these cases places high demands on both procedural experience and knowledge of the Discrimination Act for those pursuing the claim. For a private individual without legal training, bringing a case before the courts can therefore be difficult and expensive. Engaging a qualified legal representative, however, entails costs for the individual¹⁵⁹.

Although legal aid exists in principle, it is limited in scope and not always accessible for employment related claims. In addition, relatively short limitation periods for certain claims can prevent victims from pursuing cases once the psychological impact of harassment becomes fully apparent.

¹⁵⁷ Gates DM, Ross CS, McQueen L. *Violence against emergency department workers*. J Emerg Med. (2006), pp. 331–7.

¹⁵⁸ Motion 2024/25:1310 *Tillgång till rättslig prövning för den som utsatts för diskriminering*

¹⁵⁹ *Ibid.*,



Another challenge lies in employer resistance, particularly in high pressure or understaffed sectors. Preventive measures such as increased staffing, safety redesign, training programs, or improved reporting systems can involve financial and organisational costs. Some employers therefore focus on formal compliance, producing policies and documentation, rather than making structural changes that would genuinely reduce risks. This is especially visible in public facing roles where violence is foreseeable but still treated as unavoidable.

In summary, Sweden's main challenges are not rooted in a lack of legal standards, but in particle implementation. Limited enforcement resources, underreporting driven by fear and workplace culture, uneven managerial training, barriers to legal remedies, and employer resistance to costly preventive reforms all weaken the system's real world impact. Addressing workplace violence and harassment more effectively therefore requires not only strong laws, but sustained investment in inspections, education, accessible justice mechanisms, and cultural change within organisations.

7.2 Are there specific structural, cultural, or legal barriers that hinder the effective functioning of preventive or remedial mechanisms?

A big challenge within the Swedish legal system when it comes to properly dealing with harassment and other workplace related issues has to do with who the Swedish labour system functions. As explained earlier the Swedish model is built upon the negotiations and cooperation of the unions and their members alongside the employers. This is intended to strengthen the workers position and power in their relationship with their employers and gives the members of the union a lot of strength and legal backing when an incident occurs in the workplace such as harassment. For example a member of the union will in negotiations with their employer have the backing of the union or if in a case where to go to court a member of the union will have backing of an equally strong part. This means that a member of a union will be fully included in the union and therefore enjoy the full protection that comes along with it.



On the other hand this system means that the people who are not part of a union will not have the same kind of protection and therefore be more vulnerable. They will not be able to receive the same kind of help if an incident were to occur and will be needed to handle it themselves¹⁶⁰.

7.3 Provide examples of effective practices, policies, or innovative strategies from your jurisdiction that have shown promising results in combating workplace violence and harassment. These may include sector-specific initiatives, public campaigns, employer-led programs, partnerships with civil society, or novel regulatory approaches.

Several practices and institutional strategies in Sweden have proven important in preventing and addressing workplace violence and harassment.

One important practice is the system of safety representatives established under the Work Environment Act. Safety representatives are appointed by employees and have the right to monitor working conditions, request preventive measures and bring workplace risks to the attention of the employer and The Swedish work environment authority¹⁶¹. This system strengthens employee participation in occupational safety and allows early identification of risks related to violence, threats and harassment.

Another important approach is the requirement for systematic work environment management (*SAM*). Employers must continuously identify risks, implement preventive measures and follow up on incidents in the workplace. This structure's approach has been particularly important in addressing risks such as harassment, bullying and threats from third parties¹⁶².

In addition, sector-specific initiatives have been developed to address related forms of violence affecting employees. For example in 2024 the Swedish government granted funding to the

¹⁶⁰ Juridisk tidskrift, *Konsten att inkludera arbetsrättsmigranter i den svenska arbetsrättsliga modellen*

¹⁶¹ Swedish Work Environment Act (1977:1160), Chapter 6.

¹⁶² Swedish Work Environment Authority's Regulation (AFS 2023:2), Section 2.



Swedish Association of Local Authorities and Regions (*SKR*) to strengthen employers' ability to detect when employees about exposure to violence during staff interviews and to ensure that managers have sufficient knowledge to respond and provide support. The purpose is to identify violence at an early stage and ensure that affected employees receive appropriate assistance¹⁶³.

7.4 Have any evaluations or studies been conducted on the effectiveness of these practices? If so, what are the main findings and recommendations?

Yes. Evaluations and studies have been conducted in Sweden regarding the effectiveness of legal and policy measures addressing workplace violence and harassment, most notably in the Government Inquiry SOU 2021:86, and the Legislative bill Prop 2025/26:134 which examined Sweden's compliance with ILO Convention.

The inquiry concluded that Swedish law is largely compatible with the Convention and that no major legislative amendments were required for ratification¹⁶⁴. However, the legislative bill also identified areas where implementation and awareness could be strengthened. One key finding was that Sweden has a relatively comprehensive regulatory framework, but that responsibilities are distributed across several legal regimes, occupational health and safety law, discrimination law, and criminal law, which may create complexity in practice¹⁶⁵. The system relies heavily on employer-led preventive work and on cooperation between employers and employees. While this structure is well-established, it emphasizes the importance of ensuring that employers fully understand their responsibilities, particularly regarding third-party violence and violence occurring outside the physical workplace but connected to work¹⁶⁶. The inquiry also highlighted the importance of guidance and information measures. It recommended that the Swedish Work Environment Authority be tasked with developing clearer guidance explaining employer

¹⁶³ Regeringskansliet (2024) (the Government) ”Arbetsgivare ska få hjälp att uppmärksamma våld i nära relationer” <https://www.regeringen.se/pressmeddelanden/2024/12/arbetsgivare-ska-fa-hjalp-att-uppmarksamma-vald-i-nara-relationer/> (Last visited 12/3-2026)

¹⁶⁴ Swedish Government Official Reports, SOU 2021:86 p. 15.; Swedish Legislative bill for the ILO Convention, prop 2025/26:134 p. 11.

¹⁶⁵ Swedish Legislative bill for the ILO Convention, prop 2025/26:134 pp. 15–16.

¹⁶⁶ Swedish Legislative bill, Prop 2025/26:134 pp. 13, 15 and 61.



responsibilities concerning violence and harassment from third parties and work-related violence occurring outside the workplace¹⁶⁷. This indicates that, although the legal framework itself was considered sufficient, practical implementation and clarity were identified as areas for improvement.

In addition, broader government strategies and reports have examined sector-specific exposure to violence and threats, particularly in healthcare, social services, education, and security-related professions. These studies have shown that certain groups are disproportionately exposed to workplace violence and threats, and that preventive measures must therefore be adapted to sectoral risk profiles¹⁶⁸.

¹⁶⁷ Ibid. p. 61.

¹⁶⁸ Ibid. p. 11.



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