



A project led by the association
France terre d'asile



STUDY VISIT TO SWEDEN ON GOOD PRACTICES IN UPHOLDING THE RIGHTS OF ASYLUM-SEEKING AND REFUGEE WOMEN AND GIRLS

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LIST OF ABBREVIATIONS

AMAL – Empowerment and Protection of Migrant Women Project

AMIF – Asylum, Migration and Integration Fund

CSO – Civil Society Organisation

Delmi – Migration Studies Delegation

DRC – Danish Refugee Council

ECRE – European Council on Refugees and Exiles

EU – European Union

EUAA – European Union Agency for Asylum

FARR – Swedish Network of Refugee Support Groups

FGM – Female Genital Mutilation

GBV – Gender-Based Violence

IOM – International Organization for Migration

LGBTQI+ – Lesbian, Gay, Bisexual, Transgender, Queer, Intersex and other diverse identities

MYLA – Macedonian Young Lawyers Association

NGO – Non-Governmental Organisation

NHRI – National Human Rights Institution (Sweden)

NSPM – National Coordination Against Prostitution and Human Trafficking

OECD – Organisation for Economic Co-operation and Development

SMA – Swedish Migration Agency

TPD – Temporary Protection Directive

INTRODUCTION

The study visit to Stockholm, Sweden, took place between 10–12 June 2025, complemented by a series of online meetings and written exchanges with relevant actors. The visit was organized under the framework of the AMAL Project – “Empowerment and Protection of Migrant Women”¹, a three-year initiative (2023–2025) implemented by France terre d’asile in partnership with the European Council on Refugees and Exiles (ECRE).

The overarching purpose of the study visits is to identify, document, and exchange effective gender-sensitive practices that promote the rights of asylum-seeking and refugee women and girls, including those who self-identify as such. The visit provides a platform for peer learning, mutual exchange, and the development of collaborative approaches. The Stockholm visit brought together representatives from leading refugee and human rights organizations across Europe - members of the ECRE network - including ECRE Secretariat, France terre d’asile (France), Danish Refugee Council (Denmark), Macedonian Young Lawyers Association (North Macedonia), Forum Réfugiés (France), Belgrade Centre for Human Rights (Serbia), and the Refugee Advisory Board (Bulgaria). Discussions were held with a wide range of stakeholders, including public authorities (such as the Swedish Gender Equality Agency, the Swedish Migration Agency (SMA), and the Swedish National Human Rights Institution), civil society organizations (including FARR, Swedish Refugee Law Center, Red Cross, The Migration Studies Delegation (Delmi), City Missions, Akalla Women’s Center, International Salvation Army, Existera, and ActionAid), law firms (Fridh Advokatbyrå and Din Advokat), and academia (Mälardalen University).

While the primary focus was on documenting good practices, the meetings also shed light on gaps, challenges, and emerging risks, particularly in the context of recent and forthcoming legislative reforms. These insights are essential not only for identifying replicable models across EU countries but also for strengthening advocacy efforts in Sweden during a period of significant policy change.

This report is therefore intended to serve two objectives:

To present examples of promising, gender-sensitive practices in Sweden as a model of best practices in other EU countries, particularly those represented by the participants of the visit;

To provide a basis for advocacy and dialogue around ongoing legal and policy reforms, highlighting both achievements and areas of concern.

The findings presented here draw on a combination of in-person exchanges, online meetings, and written contributions. Rather than listing the information per institution, the analysis is organized around themes that were shared across the discussions. Each section includes the Swedish context, providing an overview of the systematic and legal framework; good practices, highlighting examples of how the system or actors go beyond the basic framework to ensure rights, dignity, and quality outcomes; and challenges, outlining key obstacles or gaps identified during the exchanges.

The report also prefers the term “survivor” rather than victim when referring to individuals subjected to trafficking, gender-based violence, or other forms of abuse. Except where victim is required legally, survivor is preferred because it highlights resilience rather than powerlessness and focuses on a person’s recovery rather than the violence they experienced.

1. AMAL Project, « Autonomisation et Protection des Femmes Migrantes », <https://www.france-terre-asile.org/nos-actions/femmes-migrantes-projet-amal>

CHAPTER I: POLITICAL AND LEGAL CONTEXT ON ASYLUM AND IMMIGRATION IN SWEDEN

Swedish context

For decades, Sweden was regarded as a humanitarian frontrunner in the European Union, recognized for its progressive asylum policies and strong dedication to human rights. Legislative and policy changes since 2015 have created more restrictive conditions in the reception system, potentially limiting protection and increasing the vulnerability of self-identified refugee women and girls, including survivors of GBV.² These measures mirror broader European deterrence strategies and heighten the risk of exclusion and vulnerability, particularly for self-identified refugee women and girls and the survivors of GBV.

Since 2022, Sweden's political landscape has undergone a profound shift. The centre-right government, backed by the far-right Sweden Democrats through the Tidö Agreement², has introduced a series of reforms designed to further tighten migration rules. These changes represent a decisive break from Sweden's humanitarian tradition, steering asylum policy toward the bare minimum standards set by EU and international law.

Key measures which are either already adopted or under discussion include³:

Legal aid: A proposed amendment would reduce state-funded legal aid in the first instance to one-hour legal counselling per applicant, with a maximum of two hours in exceptional cases. Legal support during appeals would also be subject to significant limitations under the proposed changes (proposal presented in an interim inquiry report, under consideration in 2025).

- » **Undocumented people including rejected asylum seekers:** Return decisions will continue to be valid as long as the person remains in Sweden. It is otherwise valid for five years from the date the person has left the country in accordance with the decision, which in most cases also includes leaving the territory of the EU countries and the Schengen area. Re-entry bans have been extended, and asylum seekers can no longer switch from an asylum application to a work permit application (The law entered into force in April 2025 and does not include any transitional provisions).
- » **Housing and reception:** Financial support is conditional on living in Migration Agency housing and participating in activities. Proposals for additional obligations, such as restricted mobility and delayed labour market access, may take effect in October 2026 if adopted.
- » **Citizenship:** Proposed amendments under consultation include eight years of residence, proof of financial self-sufficiency, and stronger good conduct provisions (expected to take effect in June 2026).
- » **Work permits:** Income thresholds for low-skilled workers are being raised, while exemptions benefit groups such as researchers and graduates (yet to be introduced).
- » **Residence permits:** A good conduct requirement may be reintroduced, allowing permits to be denied or revoked on grounds of dishonorable behaviour (expected to take effect July 2026).
- » **Resettled refugees:** Sweden reduced its annual quota from 5,000 in 2022 to 900 in 2024, though admissions rose to 959 in 2024, up from 297 in 2023.

Civil society organisations have expressed deep concern⁴ over the pace and scope of reforms. Many report⁵ being overwhelmed by constant legal and policy changes that have made Sweden less welcoming to asylum seekers.

While the government's domestic reform agenda is framed as consistent with EU obligations, engagement in

2. DELMI, Tidö Agreement, <https://www.delmi.se/en/tida-2024/>

3. AIDA Sweden Country Report, 2024, <https://ecre.org/aida-country-report-on-sweden-update-on-2024/>

4. FARR, Protest against the Tidö Agreement and a xenophobic refugee policy, <https://farr.se/protest-against-the-tidö-agreement-and-a-xenophobic-refugee-policy/>

5. France terre d'asile, Vues d'Europe, "It is very frustrating for us, lawyers who work in this field and are really compassionate about migration": in Sweden, a legislative proposal is about to restrict legal aid, <https://www.vuesdeurope.eu/en/it-is-very-frustrating-for-us-lawyers-who-work-in-this-field-and-are-really-compassionate-about-migration-in-sweden-a-legislative-proposal-is-about-to-restrict-legal-aid/>

the EU Pact on Migration and Asylum remains minimal. Although authorities have pledged transparency during the transition of the new EU Pact, civil society involvement in drafting procedures or monitoring mechanisms is limited.

The NHRI also emphasized that they have encountered difficulties in obtaining detailed information from authorities regarding practical implementation of the new EU Pact, such as how vulnerability screenings are conducted or whether reception centres provide specialised accommodation. This lack of clarity is considered a problem in itself, as it hinders the NHRI's ability to monitor developments and assess compliance with human rights obligations.

Lawyers, legal aid providers and civil society representatives report feelings of frustration and helplessness, describing the political climate as one where their expertise and warnings are ignored. They perceive the convergence of national reforms and the new restrictions introduced under the EU Pact on Migration and Asylum as a deliberate effort to reduce the right to asylum, in conflict with Sweden's historical commitment to human rights.

In addition, several organisations noted that the Pact was not a significant part of their agenda, largely because they had not been informed of developments or involved in the process. They explained that they lacked insight into how the Pact is being negotiated or operationalised. Institutions acknowledged that although there are many cross-cutting issues between the EU Pact and the Tidö Agreement - particularly regarding how the Pact may shape the implementation or outcomes of Tidö measures - these implications remain unclear to them.

CHAPTER II: LEGAL ASSISTANCE AND REPRESENTATION

Swedish context

In Sweden, one of the most notable strengths of the asylum system is the provision of free state-funded legal aid (public counsel) at the first instance of an asylum application. While not formally regulated by law, in practice legal representatives typically receive around ten hours per case, divided approximately as three hours for interview preparation, three hours to prepare the case file, and four hours for legal arguments. This framework is widely seen as enabling a basic level of legal support to be provided during initial proceedings.

The appointment of a public counsel during the administrative process is not automatic and is assessed on a case-by-case basis. While the possibility exists, not every applicant benefits from this support. For example, if it is assumed that the applicant will be granted international protection—such as when they are from a country experiencing widespread violence due to armed conflict with no viable internal flight alternative—a public counsel will typically not be assigned. However, if circumstances change or new information emerges indicating a need for legal support, a public counsel may be appointed at that stage.

Legal representation in the form of a public counsel is provided by a licensed lawyer, legal associate at a law firm or person with similar expertise in migration law, family law and administrative law as well as procedural experience, normally with a law degree. No specific training or credentials are required for those handling asylum cases involving women or children. This contrasts with other legal sectors in Sweden - for example, child protection cases - where courts are required to appoint lawyers with relevant expertise. The Swedish system allows for separate counsel for children in sensitive cases, such as FGM, though parental consent remains a procedural requirement. Legal representatives must meet qualification requirements, particularly when appointed to represent children separately from their parents.

In June 2025, a Government Bill⁶ was introduced proposing, amongst other things, stricter requirements for those wanting to act as public counsel, including requirements of a law degree. The Bill also contains proposals for provisions that will make it possible to declare individual public counsels or legal representatives as unsuitable to undertake such a responsibility. A consequential amendment to the proposal is that the specific suitability rules in e.g. child protection cases will be abolished. In addition, the new bill also limits the practice of substitution. In the past, many lawyers would take on numerous cases and delegate client meetings to others. This practice negatively affected asylum seekers, who must discuss deeply personal and traumatic experiences and therefore need to establish trust with their legal representative.

Good practices

- » **Gender-and-trauma sensitive interviews:** A good practice noted by legal professionals has been to ensure that self-identified women and girls can express any difficulties or specific needs during registration interviews with the Migration Agency. Asylum seekers can request a lawyer, legal adviser, social worker, or interpreter of a preferred gender, and private meetings with social workers are available when necessary, allowing applicants to speak freely without fear. Legal representatives play a crucial role in ensuring gender and trauma considerations are addressed in interviews. In particular, the system permits the appointment of a separate counsel for children in cases of heightened sensitivity.
- » **Role of NGOs in legal support:** NGOs play a complementary role to the existing state funded system. The Swedish Refugee Law Center provides comprehensive support, including family reunification advice, and assists vulnerable groups such as torture survivors, women at risk of gender-based violence, and children. The center offers free legal advice via a telephone hotline and online service, acts as legal representatives and public counsels, offers training and capacity building, and performs advocacy work. FARR provides free legal advice, assists local asylum committees, trains legal professionals, and works in several languages (Arabic, Farsi, English, Swedish, and Russian). It also runs a hotline and email service addressing issues like family reunification. In addition, FARR keeps its members updated on legislative developments, including proposed changes to asylum laws. The Swedish Red Cross provides legal support on asylum issues, including direct assistance to volunteers who meet asylum seekers that participate in their local activities, training and capacity building. It also operates a migration support service through a telephone hotline and online contact forms, where legal specialists respond

6. Prop. 2024/25:195, <https://www.regeringen.se/rattsliga-dokument/proposition/2025/06/prop.-202425195>

to inquiries, provide referrals, and take on casework when relevant.

Challenges

- » **Assignment of counsel and pro bono limitations:** Firstly, each asylum seeker can either select their own lawyer or be assigned one by the Migration Agency. There is currently no formal system for pro bono representation once a lawyer has been appointed, except in instances where a negative decision has already been issued. Lawyers also report structural limitations in the system, including the automated appointment of legal representatives, which is based on availability rather than expertise. This may result in complex or sensitive cases being assigned to less experienced lawyers. Requests to change assigned counsel can be submitted to the Migration Agency, though such requests are rarely granted, particularly if made at a late stage in the process.
- » **Proposed restrictions on legal aid:** A proposed legislative amendment under consideration at the time of the study visit would reduce the amount of state-funded legal aid at first instance to one-hour legal counselling per applicant, with the possibility of a maximum of two hours in exceptional circumstances. This has generated concern, among legal professionals⁷, who note that such limitations may impair their ability to provide adequate legal advice and preparation, particularly for cases involving families, trauma, or specific protection needs. The changes would risk having particularly negative consequences for vulnerable applicants, including women with gender-based claims, and children – including unaccompanied minors. Legal support during appeals would also be subject to significant limitations under the proposed changes. The role of the publicly funded legal representative in appeals is not proposed to be limited in time. However, the legislative proposal introduces provisions in accordance with the Regulations that enable the migration courts to refrain from appointing a public counsel or to dismiss a public counsel in certain situations. **Reliance on NGOs:** Since there is a risk for asylum seekers to lose the right to free legal aid in the first instance, some legal practitioners have begun advising clients to seek additional legal guidance from civil society organizations that provide free legal aid. However, these organizations are currently not supported through government funding, raising questions about the sustainability of such supplementary legal services. Concerns have also been raised regarding whether seeking and receiving support and legal advice from NGOs will risk having negative consequences for the applicants, such as losing the right to legal counselling or legal representation in the appeal procedure.
- » **Professional challenges:** Finally, several lawyers noted that migration law is generally not a high-prestige area within the Swedish legal profession. The relatively low remuneration and heavy workloads associated with asylum cases may affect recruitment and retention of experienced legal professionals in this field. If proposed limitations are introduced, lawyers may furthermore feel prevented to accept appointments for ethical reasons.

7. France terre d'asile, Vues d'Europe, « C'est très frustrant pour nous, avocats réellement sensibles à la question migratoire » : en Suède, un projet de loi s'apprête à restreindre l'aide juridique aux demandeurs d'asile », <https://www.vuesdeurope.eu/cest-tres-frustrant-pour-nous-les-avocats-qui-travaillons-dans-ce-domaine-et-qui-sommes-reellement-sensibles-a-la-question-migratoire-en-suede-un-projet-de-loi-sapp/>

CHAPTER III: GENDER-SENSITIVE ASYLUM PROCEDURES AND PROTECTION

Swedish context

In 2024, 3,759 women applied for asylum, a decrease from 4,590 applications in 2023. Under the Temporary Protection Directive, 5,535 women applied in 2024, slightly fewer than the 5,588 applicants in 2023⁸. The SMA keeps statistics on the number of women and men that have been granted international protection status, however, due to national legislation the SMA is not allowed to keep statistics on the grounds for international protection, such as FGM or domestic violence since such information is considered sensitive personal data, according to the General Data Protection Regulation (GDPR)⁹.

Swedish asylum procedures include several gender-sensitive components, particularly during the registration and interview stages. The asylum interview is always conducted individually. Families are usually invited to attend interviews on the same day, with the time divided among the different family members. The SMA informs all adult applicants about their right to confidentiality, including in relation to a spouse, and should also inform about the possibility of being assigned a separate public counsel from their spouse.

At the initial intake, the SMA conducts a screening interview designed to identify applicants with specific needs or vulnerabilities. During this stage, applicants are able to request a female caseworker or interpreter, which is an important consideration in cases involving gender-based violence or other sensitive issues.

Swedish asylum legislation extends beyond the 1951 Geneva Convention by explicitly including gender and sexual orientation in its refugee definition. In national law, individuals may be granted refugee status if they fear persecution due to race, nationality, religion, political opinion, gender, sexual orientation, or membership in a particular social group. The inclusion of gender and sexual orientation as standalone grounds is recognized as a progressive development, offering enhanced protection, especially for women including LGBTQ+ (Lesbian, Gay, Bisexual, Transgender, Queer, Intersex and other diverse identities) applicants. For example, cases involving trans women have also received protection through refugee or subsidiary protection status, trans men are rarely encountered and less commonly addressed in case law.

This legal framework has facilitated positive outcomes for some Afghan women, whose claims are often assessed primarily on the basis of gender.

The SMA has drawn up a legal position paper¹⁰ on the investigation and assessment of gender-based persecution. The paper includes a method on how to investigate and assess the risk for women who claim gender-based persecution. To give further support, there are guidelines for asylum case officers on how to identify and document special needs, how to detect and which measures to take in GBV, trafficking or underaged marriage cases as well as how to manage asylum cases in which there may be a risk of female genital mutilation.

The SMA also offers courses and webinars on GBV, Female Genital Mutilation (FGM), and honour-related violence for its staff¹¹. Some of the available courses and webinars include:

- » Gender-based violence
- » FGM and the migration process
- » FGM – legal aspects and the right to asylum
- » FGM in Egypt, Iraq, Somalia, and Ethiopia

8. ECRE AIDA Sweden Country report, 2024, <https://ecre.org/aida-country-report-on-sweden-update-on-2024/>

9. Migrationsverket, <https://www.migrationsverket.se/en/about-the-swedish-migration-agency/the-swedish-migration-agency-answers/2024/2024-06-17-this-is-how-it-works-when-we-process-cases-where-lgbtqi-is-grounds-for-protection.html?utm>

10. RÄTTSЛИGT STÄLLNINGSTAGANDE Utredning och bedömning av förföljelse på grund av kön avseende kvinnor <https://lifos.migrationsverket.se/dokument?documentAttachmentId=48579>

11. This information was provided by the SMA in a written response rather than during an interview. As a result, no follow-up information was available regarding : whether these trainings are mandatory or voluntary for staff or whether the Swedish asylum procedure allow the participation of a trusted person (personne de confiance) next to the lawyer at the moment of the international protection interview.

- » Child marriage and forced marriage
- » Honour-related violence

Good practices

- » **Interview practices and gender sensitivity:** During the short interview conducted when an application for international protection is submitted, the SMA asks whether the applicant prefers a female or male interviewer, interpreter, and public counsel. However, the purpose of the right to make this request is not always explained. Legal representatives provide guidance to overcome trust barriers, enabling women and children to disclose sensitive information safely. The SMA encourages applicants to discuss any matters that might affect their need for international protection and specifically asks about any forms of violence or coercion the applicant has experienced, or fears that such violence or coercion may occur in the future.
- » **Professionalism and trauma-Informed approaches:** In contrast to some EU countries - such as France (particularly in Calais) and Greece (notably Lesbos) - where asylum interviews are often described as rushed or superficial, interviews in Sweden are considered to be more thorough and conducted with a higher degree of professionalism and empathy. Interviewers typically offer breaks or approach applicants with kindness which contributes to a more respectful and trauma-informed process and climate of trust.
- » **Interpreters:** A positive practice observed in some cases is the assignment of different interpreters for follow-up interviews, which can help correct miscommunications and improve applicant comfort.
- » **Collaboration and NGO support:** Collaboration between legal representatives and psychosocial actors strengthens the applicants' overall well-being and contributes to more comprehensive case presentations.
- » Support from NGOs, social services, and healthcare providers plays a crucial role in assisting survivors to recover and navigate the asylum process. The Swedish Refugee Law Center particularly focuses on supporting survivors of torture and gender-based violence, ensuring that legal advice and procedures account for psychological vulnerabilities.
- » **Refinements in Migration Agency procedures:** Ongoing efforts by the Migration Agency aim to refine procedures, including appointing separate counsel for women and children when necessary and assessing credibility in cases of late disclosure.
- » **Training and capacity-building:** Optional training opportunities exist through bar associations and civil society organizations, covering topics such as working with survivors of torture, asylum procedures involving children, or country-specific issues. Occasional NGO-led workshops help fill training gaps, and the Swedish Refugee Law Center also contributes to training legal practitioners on handling gender-based asylum claims, including those involving torture or FGM.
- » **Case examples of multi-agency support:** Two examples illustrate the importance of multi-agency collaboration:
 - » A woman from Azerbaijan and her two children initially received a negative decision from the SMA. Over the course of several years, with support from legal counsel, NGOs, and social services, she provided new evidence of domestic abuse. Her legal representative successfully argued for a re-examination of the case, and, although the Migration Agency rejected the second claim, the Migration Court overturned the decision, citing the extensive support from public actors and confirming the woman's need for protection.
 - » A woman who had experienced sexual violence and abuse by her husband in her home country was initially not taken seriously by the authorities. However, after legal intervention and insistence on a thorough investigation, the applicant received protection. The appointment of dedicated legal counsel and the introduction of supporting documentation were key to the outcome.
- » **Trends in GBV Claims:** Practitioners noted that gender-based violence cases involving intimate partners are more likely to result in positive decisions, especially when they include police involvement or documentation from other institutions in particularly public institutions.
- » The Swedish Federation for Lesbian, Gay, Bisexual, Transgender, Queer and Intersex Rights (RFSL) has also produced a report that examines, among other issues, credibility assessments in SOGIESC-related asylum procedures. In "Rejection Motivations in SOGIESC Asylum Cases in Sweden," RFSL analyses 3,360 individual decisions and court rulings issued between 2012 and 2024. The study

identifies how credibility assessments were applied in practice and highlights several areas where the methods used by the authorities diverged from recommended standards¹².

Challenges

- » **Right to choose interviewer and barriers for children:** The purpose of the right to request a female or male interviewer, interpreter, and public counsel is not always explained. The SMA requires parental consent for children's interviews, which can create barriers to disclosure in sensitive cases such as FGM.
- » **Challenges in interpretation and child testimony:** Another challenge affecting gender-sensitive asylum procedures involve the quality of interpretation services. Stakeholders noted that interpreters occasionally make errors in translation, which can have significant implications during sensitive interviews¹³. It is also reported that the quality of the testimony of children was affected by waiting long periods on the same day as their parents or observing parents' reactions through glass windows during their interview.
- » **Impact of trauma on communication and testimony:** The asylum process often involves applicants who have experienced severe trauma, including gender-based violence and domestic abuse which can significantly affect their ability to navigate the asylum procedure. During interviews, the emotional and psychological state of the applicant significantly impacts their capacity to give a coherent or detailed account of their experiences. Language barriers, trauma-related stress, and cultural factors may hinder their expressiveness, potentially affecting the outcome of their claims. Access to specialized health and psychosocial support is not uniformly guaranteed.
- » **Inconsistent training on GBV:** Although the SMA offers training opportunities on GBV, civil society representatives highlighted that the level and consistency of such training varies. There are no formal requirements for all legal representatives or Migration Agency staff to have specialized knowledge in gender-related asylum claims. Legal professionals are not required to demonstrate specific expertise in GBV or related protection needs, even in cases where such issues are central to the applicant's claim. By comparison, Swedish family law requires specialized qualifications: in child protection cases, courts may only appoint lawyers who have undergone relevant training. This highlights a discrepancy between Sweden's general legal standards and those applied in the asylum context to survivors of GBV. In particular, the reversal of the burden of proof which benefits any survivor of past torture.
- » **Evidentiary burden in GBV cases:** Asylum claims based on GBV - such as domestic violence, sexual assault, or intimate partner abuse - are more likely to succeed when supported by external documentation, including police reports or validation from NGOs and social services. However, the system imposes a significant evidentiary burden on applicants. Even in strong cases, applicants often face skepticism unless multiple actors verify their claims. It is often not sufficient for a woman to explain her experience without institutional backing.
- » **Barriers to documentation and intersectional vulnerabilities:** Lawyers reported that women often face difficulties in providing necessary documentation, such as identity papers or embassy contacts, which can affect both the asylum process and long-term residence or citizenship applications. Even when presenting credible claims, some applicants are denied protection without support from external institutions. Legal professionals and civil society representatives highlighted that the perceived credibility of claims frequently depends on language proficiency, emotional expression during interviews, and external corroboration. Applicants who struggle to clearly communicate their experiences - due to trauma, language barriers, or cultural norms - may be disadvantaged. Moreover, intersectional vulnerabilities, including cultural constraints on disclosure, reliance on male networks, compounded forms of gendered harm, and political beliefs, are often overlooked. Lawyers noted that cumulative factors are rarely recognized, and intersectional approaches are not systematically applied in case assessments.
- » **Political opinion vs. gender-based persecution:** In contrast to Afghan women, asylum applications from Iranian women - particularly those refusing to wear the hijab or openly disagreeing with the Islamic regime - are frequently classified under political opinion rather than gender-based persecution. Practitioners noted that such claims might also qualify as gender-based, but authorities often avoid using the gender ground due to the higher burden of proof. While this approach allows protection of a

- 12. AIDA Sweden 2024 Report, https://asylumineurope.org/wp-content/uploads/2025/05/AIDA-SE_2024Update.pdf & RFSL, Rejection Motivations in SOGIESC asylum cases in Sweden, <https://www.rfsl.se/wp-content/uploads/2024/09/Rejection-Motivations-in-SOGIESC-asylum-cases-in-Sweden.pdf>
- 13. In June 2025, a Government Bill was introduced proposing, amongst other things, stricter requirements for those wanting to act as public counsel, including requirements of a law degree. Competence requirements will be introduced for interpreters and translators in migration cases.

larger number of people, it simultaneously limits intersectional analysis. Intersectional vulnerabilities such as cultural constraints on disclosure or cumulative forms of harm are not systematically addressed.

- » **Policy restrictions on repeat applications:** Legal professionals highlighted new policy restrictions on repeat asylum applications, noting that as of April 2024, individuals can no longer reapply unless they first leave the EU - whereas previously, a new claim could be lodged after four years. This change is seen as particularly harmful to survivors of gender-based violence, who often need considerable time before disclosing their experiences and may now lose the chance to seek protection after an initial rejection. While Sweden's asylum system is generally regarded as structured and effective in addressing the needs of women and children, it is now threatened by recent and forthcoming reforms that risk undermining gender-sensitive protections and weakening the system's responsiveness to vulnerable groups.
- » **Subsidiary protection for self-identified women and girls:** While Sweden can offer subsidiary protection to women and girls when the general situation in their country of origin poses serious risks, this option is limited to broadly deteriorated national contexts. In such cases, protection is granted not based on individual persecution, but due to widespread insecurity or gender-based discrimination. This pathway has also occasionally been applied in cases involving trans women.

CHAPTER IV: ACCESS TO ACCOMMODATION

Swedish context

A snapshot of the reception register in 2024 shows that 22,678 of 22,678 women were registered in the reception system. In comparison, a total of 29,445 women were registered in the system in 2023¹⁴.

Out of the women that seek international protection and temporary protection registered in the reception system¹⁵:

- » 8% are listed as housed under the SMA and are asylum seekers,
- » 15% are in private housing and are asylum seekers,
- » 43% are in private housing and have applied for protection under TPD,
- » 33% are listed in housing provided by the municipalities and applied for protection under TPD,
- » 2% in other housing

Although women in Sweden are usually accommodated separately from single men, many women continue to feel unsafe in reception centers because of overcrowding, shared facilities, and insufficient security measures. While arrangements may vary across different accommodation facilities, one suggested measure to ensure safe living conditions for women is to provide separate buildings - or separate sections within buildings - where single women and single men reside apart from each other.

A new regulation, effective as of March 2025, introduces key changes to the reception conditions for asylum seekers in Sweden. Under this regulation, asylum seekers are only entitled to financial assistance, including daily allowances and special grants, if they reside in accommodation specifically assigned by the SMA. Exceptions can be made if the applicant resides with a close family member who holds a residence permit in Sweden or if there are other extraordinary circumstances. The Agency has also been granted authority to verify that applicants are actually residing at their designated location. In addition, asylum seekers are now required to participate in a societal introduction programme as part of the reception process.

Previously, around 65% of asylum seekers lived in private accommodation. Under new rules, those who decline Migration Agency housing will lose access to daily allowances and financial support. While work rights remain unchanged, stricter residence and reporting requirements reflect a broader effort to centralize asylum seekers within official reception facilities.

For those who receive a final negative decision on their asylum application, the right to accommodation and support ends.

Looking ahead, additional obligations are proposed to come into effect in October 2026, including attendance checks at reception centers, restrictions on movement between counties, stricter reporting requirements, and a six-month waiting period before gaining access to the labour market. These reforms signal a growing emphasis on control and monitoring within Sweden's asylum reception system.

Good practices

- » **Community-based support and advocacy:** FARR's local groups play a key role in supporting newly arrived asylum seekers, offering community engagement, counselling, and integration activities. Some groups also focus on LGBTQI+ issues. These services operate without official funding, which allows FARR to speak freely and mobilise political and humanitarian action when necessary.
- » **Reception of LGBTQI+ persons:** LGBTQI+ asylum seekers may request a transfer or file a complaint with the Discrimination Ombudsman based on the incidents in the reception centers. Their special needs are increasingly considered in housing, with support from Swedish Federation for Lesbian, Gay, Bisexual, Transgender, Queer and Intersex rights (RFSL) and efforts to provide suitable solutions, including student-like corridors or special centres. Individual assessments determine housing, access

14. ECRE AIDA Sweden Country Report, 2024, <https://ecre.org/aida-country-report-on-sweden-update-on-2024/>

15. Ibid.

to networks, and medical care. In 2023, at least one centre in Västerås offered dedicated apartments and activities for LGBTQI+ persons. An LGBTQI+ perspective is also included in the social information provided during the asylum process¹⁶.

Challenges

- » **Safety and gender-sensitive accommodation:** Despite housing arrangements separating families and women from single men, many women still feel unsafe in reception centers. The lack of systematic provision of gender-sensitive accommodation, such as separate facilities for single women, remains a concern.
- » **Impact of 2025-2026 regulations:** The 2025 regulation restricts asylum seekers' autonomy by tying financial support to SMA-designated housing, increasing risks of marginalisation. Ending accommodation for rejected applicants creates precarious conditions, with some families going underground. Future reforms (2026) will likely pose further challenges to protection and integration.

16. AIDA Sweden Country Report, 2024, <https://asylumineurope.org/reports/country/sweden/reception-conditions/special-reception-needs-vulnerable-groups/>

CHAPTER V: INCLUSION

Swedish context

A policy initiative under review proposes abolishing permanent residence permits for asylum seekers and refugees who arrive in Sweden following resettlement from a third country through UNHCR¹⁷, replacing them with temporary permits only. This change is part of a broader overhaul set to be implemented around mid-2026.

Under current Swedish rules, most non-EU nationals can apply for citizenship after five years of continuous residence and holding a permanent residence permit. In practice, citizenship applications often take significantly longer to process. Women, in particular, face additional structural and administrative barriers in the application process. Many struggle to obtain the necessary documentation, which is often held or controlled by male family members - such as fathers or husbands. This situation disproportionately impacts women, and there are reports that authorities are less responsive or supportive in assisting women who attempt to access documents independently.

Statistical data indicate¹⁸ that among the 25–64 age group, 38% of native-born and 36% of foreign-born persons have post-secondary education. Employment rates are lower for women than men, with the gender gap more pronounced among the foreign-born (foreign-born men 67% vs women 58%; native-born men 76% vs women 73%). Income disparities exist between foreign- and native-born persons, including a measurable advantage after adopting a Swedish-sounding surname (annual increase of 10,000–15,000 SEK).

Health indicators also show disparities¹⁹: in 2008–2009, approximately 84% of native-born adults reported good health compared with 73% of foreign-born adults. Foreign-born women reported the lowest levels (69%). Poor or very poor health was reported by 4% of native-born individuals versus 17% of persons born outside Europe.

A research on refugee youth²⁰, particularly unaccompanied children, highlights significant gender differences in educational outcomes, with girls often outperforming boys and Swedish-born peers. Long-term follow-up shows high educational and labour market integration for children from the 2015 so-called “refugee crisis”, emphasizing the importance of early support, inclusion, and intersectional approaches to policy.

Good practices

» **NGO Support:** NGOs provide essential support for inclusion, particularly for women and girls, offering social, educational, and practical assistance. Examples include:

- City Missions (Stockholms Stadsmission):
 - Provides long-term, tailored support through individual implementation plans, group and individual counselling, and accompaniment to authorities and social services.
 - Focuses on vulnerable populations, especially women, single parents, and undocumented migrants.
 - Offers childcare support, housing assistance, legal guidance, and gender-sensitive programs, helping women navigate asylum, family law, and health services.
 - Encourages empowerment and agency by centering interventions on personal goals and facilitating knowledge about rights and obligations.
 - Implements structured programs like “Who Am I Tomorrow,” promoting safe spaces to reflect on asylum experiences, share challenges, and explore future opportunities.
 - Expertise in LGBTQI+ support and sensitive handling of issues such as paternity establishment or protection of undocumented children.

17. This differs from asylum seekers, who travel to Sweden on their own and apply for protection after arrival.

18. Meeting with Uppsala University, Mehrdad Darvispour, [Mehrdad Darvishpour - Uppsala universitet](#)

19. Ibid

20. Ibid

- Akalla Women's Center:
 - Provides a safe, inclusive environment combining social support, rights education, Swedish language learning, and community-building.
 - Supports women with migration backgrounds who face vulnerabilities such as economic hardship, trafficking, or social marginalization.
 - Offers empowerment-focused interventions, including co-created individual action plans and access to legal, social, and healthcare services.
 - Uses multi-language communication and interpretation services to ensure accessibility and comprehension.
 - Encourages active participation, integration, and practical application of rights-based education through workshops, excursions, and appointments with service providers.
 - Partnerships with other NGOs and government agencies enhance integration support and public advocacy.
- Swedish Red Cross:
 - Provides legal and psychosocial support for undocumented migrants and asylum seekers.
 - Serves as a health referral center that provides advice and support to undocumented and other migrants in need of medical care in Sweden. The center assists with referrals and connections to Swedish medical facilities to ensure individuals receive the care they are entitled to. When access to public healthcare is not possible, they help arrange appointments with doctors.
 - Operates trauma-informed programs, including intensive treatment for asylum seekers.
 - Provides training and guidance to a wide range of professionals, authorities, officials, and decision-makers who work with or encounter unaccompanied minors in their professional roles.
 - Focuses on empowerment through knowledge and improving access to essential services despite bureaucratic or legal limitations.

Challenges

- » **Shift to temporary residence permits:** The proposed shift from permanent residence permit to temporary residence permits raises concerns about long-term stability, access to citizenship, and integration prospects. Women face particular barriers in securing required documentation, often due to family power dynamics, which can delay or prevent naturalisation.
- » **Labour market and economic disparities:** Employment and income disparities persist between native- and foreign-born populations, with women disproportionately affected. Swedish National Human's Rights Institution (NHRI) highlighted that women face more obstacles in entering the labour market, which in turn makes it harder for them to meet requirements for permanent residence or family reunification.
- » **Health inequalities and limited tailored support:** Health inequities among foreign-born women further complicate integration and access to services. Swedish NHRI also underlined that current establishment and integration programmes are not adequately tailored to the specific challenges women face, leaving them disadvantaged throughout the migration and integration process.
- » **Fragmented support services:** While NGOs provide vital support, services are often limited in scope, fragmented, and dependent on private funding or project cycles. Gaps in access to legal, housing, and healthcare resources remain, especially for undocumented women and vulnerable groups.
- » **Unaddressed intersectional vulnerabilities:** Intersectional vulnerabilities, including gender, migration status, and socio-economic conditions, are not always addressed consistently in integration policies.

CHAPTER V: ANTI-TRAFFICKING AND EXPLOITATION PROTECTION

Swedish context

Human trafficking is legally recognized as a complex and serious crime in Sweden that involves multiple stages, from the recruitment and transportation of individuals to their eventual exploitation. These exploitative acts may include sexual services, forced labour, begging, criminal activity, or organ removal. Trafficking is not only a criminal act but also a grave violation of human rights.

Legal framework

Swedish law, as outlined in Chapter 4, Section 1a of the Criminal Code (2010:371), stipulates that three key elements must be fulfilled to define an act as human trafficking: the use of unfair means such as coercion or deception, the act of trafficking such as recruitment or harboring, and the purpose of exploitation. Notably, in the case of children, the use of coercion or deceit is not required for the crime to be recognized. In addition to the primary legislation addressing trafficking, Sweden introduced the offense of human exploitation in July 2018. This law allows for prosecution in cases involving forced labour, unreasonable working conditions, or coerced begging, even when all elements of traditional trafficking are not present.

The Swedish Sex Purchase Act, in force since 1999, forms another cornerstone of the national response. Known as the Gender Equality Model, it criminalizes the purchase of sex while decriminalizing its sale, thereby targeting demand and reinforcing gender equity. Prostitution and human trafficking for sexual purposes also receive particular attention in the Swedish government's ten-year national strategy for the elimination of men's violence against women (2017-2026)²¹. This strategy is implemented by the Gender Equality Agency, which also leads the National Task Force against Prostitution and Human Trafficking—a multi-agency platform including the SMA. This Task Force serves both strategic and operational roles to enhance cooperation between government agencies and NGOs.

Under the Council of Europe Convention on Action against Trafficking in Human Beings, individuals identified as potential survivors are entitled to a range of protective measures. These include access to suitable and safe housing, a minimum 30-day reflection period, material support, necessary medical and psychological care, legal counseling and representation, as well as interpretation services. Applications for these services can be initiated by municipal social welfare committees in collaboration with the SMA, even in the absence of a formal criminal investigation. At the municipal level, social services are responsible for victim protection, with all victims entitled to support regardless of migration status under Swedish law.

Coordination and strategy

The Gender Equality Agency is a core player in Sweden's anti-trafficking efforts, coordinating the national strategy and support mechanisms. They manage several initiatives, including a national telephone helpline and the Voluntary Return and Integration Programme (run by IOM and funded by the Agency) as well as a network of regional coordinators against prostitution and trafficking. These coordinators offer practical consultation and guidance to both victims and frontline professionals.

A National Referral Mechanism that is coordinated by Swedish Gender Equality Agency was established in 2016 and updated in 2023 to improve cross-agency cooperation in victim identification and referral processes, though this system serves as method support rather than a legally binding procedure. The police are expected to notify social services when they identify victims, but this is not mandatory by law. In 1997, Sweden became the first EU country to appoint an independent National Rapporteur on Trafficking in Human Beings, placed within the Swedish Police Authority, following the Hague Declaration recommending all EU states to do so. The National Rapporteur investigates, monitors, and analyses all forms of human trafficking and prostitution in Sweden, publishing annual reports with recommendations for the government. The Police Authority's role as National Rapporteur is formalized under Regulation 2014:1102. The Swedish Police Authority prioritizes investigations of human trafficking in its operational policy. Anti-trafficking activities are mainly carried out at the regional level, with five of seven Police Regions having dedicated groups. Most regions have adopted action plans to strengthen these efforts. Special contact persons in each region regularly report data to the

21. Swedish government's ten-year national strategy for the elimination of men's violence against women (2017-2026), <https://www.government.se/information-material/2023/01/swedens-work-to-combat-mens-violence-against-women/>

National Rapporteur, which is included in the annual progress reports.²²

Survivor identification and risk factors

Several behavioural and situational indicators can assist in identifying survivors of human trafficking. These include being frequently relocated to avoid detection, having minimal awareness of their environment, lacking access to healthcare or social interaction, and being under constant surveillance or control, often through mobile devices. Survivors may also lack possession of their travel documents, hold falsified identification, and demonstrate an inability to contact family or friends. Language barriers, signs of coercion, and evidence of debt bondage are also common.

In 2024, the SMA identified 684 suspected survivors of human trafficking. In 2024, the SMA granted 79 temporary residence permits for trafficking victims²³. The national police received 185 reports related to human trafficking. Regional coordinators across the country documented 430 victims of trafficking, while organizations affiliated with the Civil Platform Against Human Trafficking came into contact with 403 individuals.

Annual regional-level reports and statistics support policymaking and prevention strategies. In 2023, The majority of the 430 trafficking survivors identified by the regional coordinators, are migrants, with labor exploitation cases exceeding sexual exploitation.

Good practices

- » **Legal and institutional measures:** Mandatory training is provided for police officers and prosecutors, supplemented by online modules and regional sessions to enhance professional capacity. However, civil society groups are not consistently involved in developing training content, limiting incorporation of survivor-focused perspectives.
- » **Civil society involvement:** The Swedish response to human trafficking is characterized by a robust legal framework, active civil society engagement, and a clear focus on victim-centered support. The visit highlighted the essential role of organizations like the Salvation Army in bridging the gap between legal rights and practical access to services. The Salvation Army provides significant practical support in both the prevention of trafficking and the provision of direct support to survivors. Their work is informed by education and advocacy, as well as by practical assistance such as safe housing, counselling, and rehabilitation services.
- » A key initiative operated by the Salvation Army is the Safe Havens Trafficking Center in Stockholm, which is certified by the National Support Programme. The center offers drop-in services every Wednesday, alongside digital support accessible both nationally and internationally. Legal and social support is provided through partnerships with specialized law firms such as Asylbyrån and Brottsbyrån. Each client is paired with a legal buddy, a dedicated advocate who accompanies the individual throughout their legal and recovery journey.
- » In 2024, the Salvation Army came into contact with 342 individuals who were potentially survivors of trafficking, representing an increase from 287 in the previous year. These included both men and women, as well as 11 children. Approximately sixty percent of the cases involved labor exploitation, thirty percent involved sexual exploitation, and ten percent involved either other forms or multiple forms of exploitation.
- » Legal professionals have testified to the center's critical impact. Representatives from Asylbyrån emphasized that Safe Havens fills a gap in the legal system, offering support and guidance that facilitates more secure asylum procedures. Likewise, legal advisors from Brottsbyrån underscored the importance of early involvement and trust-building with survivors, which enhances the likelihood of successful legal proceedings and convictions against traffickers.
- » **Multi-sector collaboration:** The Gender Equality Agency also oversees stakeholder coordination across sectors. This includes a coalition of civil society organizations and shelters, which receives public

22. European Commission, Migration and Home Affairs, Sweden, General Information: situation of trafficking in human beings, https://home-affairs.ec.europa.eu/policies/internal-security/organised-crime/together-against-trafficking-human-beings/eu-countries/sweden_en

23. U.S. Department of State, 2025 Trafficking in Persons Report: Sweden, <https://www.state.gov/reports/2025-trafficking-in-persons-report/sweden/>

funding; partnerships with trade unions to identify labour exploitation, particularly involving children; and cooperation with airport authorities, where staff receive targeted training to recognize signs of trafficking. A police unit is dedicated to online surveillance, working with NGOs through digital platforms and chat services to identify survivors recruited through manipulative means such as the so-called “lover boy” technique²⁴.

- » **Awareness raising:** Awareness-raising and prevention strategies continue to evolve. The Gender Equality Agency’s work is further supported by a range of national and international resources, including the 2021 final report on exploitation and trafficking, educational content like the National Coordination Against Prostitution and Human Trafficking (NSPM) airport training video²⁵, and advocacy organizations such as Childdex, which plays a key role in raising awareness and improving response measures. Recent campaigns have included outreach to Bulgarian and Romanian labor migrants; a multilingual brochure outlining rights in Sweden, and the “Don’t Let the Silence Speak” campaign²⁶, which uses a bystander approach to target young men and is distributed via cinemas and YouTube. Additional initiatives aim to promote global awareness of child trafficking, as well as education on sexual consent and online safety for teenagers, particularly in the context of platforms like TikTok.

Challenges

- » **Root causes and survivor identification:** The drivers of human trafficking in Sweden are multifaceted. Economic disparity and poverty create an environment where individuals are vulnerable to exploitation. Displacement caused by war, conflict, and persecution often leads to migration under precarious conditions, increasing susceptibility to trafficking. Systemic factors such as corruption, discrimination, and honor-based violence further exacerbate vulnerability, particularly among marginalized populations. The promise of economic opportunity combined with a lack of legal protection contributes to a cycle of exploitation sustained by high profits and low risk for perpetrators.
- » Labor trafficking survivors remain difficult to detect, particularly as marginalized populations often avoid engaging with institutions due to fear or lack of awareness. This reliance on NGOs for survivor support highlights systemic vulnerabilities and leads to uneven service coverage. In response, the Gender Equality Agency has found it more effective to target professionals who work directly with affected communities, as these intermediaries are better positioned to identify and support individuals who might otherwise remain hidden from institutional outreach.
- » **Data and enforcement gaps:** Limited reliable data impedes comprehensive monitoring and assessment of trafficking trends.
- » **Resource and coordination constraints:** State infrastructure remains insufficient for full, nationwide coverage of anti-trafficking services.
- » Civil society engagement, while essential, is limited by funding and capacity, emphasizing the need for better-resourced, coordinated strategies.

24. IOM, Understanding the ‘lover boy’ technique of human trafficking, <https://romania.iom.int/news/understanding-lover-boy-technique-human-trafficking>

25. NSPM , the national coordination against prostitution and human trafficking, Airport staff to strengthen work against human trafficking, <https://nspm.jamstalldhetsmyndigheten.se/nyheter/utbildning-ska-starka-arbete-mot-manniskohandel/>

26. Swedish Gender Equality Agency, Don’t let the silence speak campaign, <https://swedishgenderequalityagency.se/men-s-violence-against-women/prostitution-and-human-trafficking/don-t-let-the-silence-speak/>

CHAPTER VI: FEMALE GENITAL MUTILATION (FGM) SUPPORT

Swedish context

Sweden has explicitly banned female genital mutilation since 1982 under the 'Act Prohibiting the Genital Mutilation of Women,' which prohibits any operation on female genitalia intended to mutilate or permanently alter them, regardless of consent²⁷.

In Sweden, general child protection laws—such as the Social Services Act, the Care of Young Persons Act, and the Act on Special Representatives for a Child - can be applied in FGM cases. The Social Services Act is the main framework, with 2002 guidelines clarifying actions in cases of risk, parental support for FGM, or suspicion of the practice. Interventions are primarily voluntary, but if insufficient, the Care of Young Persons Act allows authorities to place a child in protective custody without consent²⁸.

Since 2016, Swedish social services have had the authority to issue travel bans to prevent children at risk of FGM from being taken abroad, a measure that can be enforced by the police.

As of 2023²⁹, it is estimated that 68,000 women and girls are affected by FGM³⁰ in Sweden and that 13 000-23 000 at risk³¹. The practice is most commonly associated with diaspora communities from Somalia, Eritrea, Gambia, Ethiopia, Djibouti, and Kurdish region in Iraq.

The Swedish Gender Equality Agency coordinates the national response within the framework of the government's 2016–2026 strategy to combat violence against women. The agency convenes quarterly meetings with representatives of key- civil society organizations and of public services like police, justice, healthcare professionals, education, and migration authorities to ensure coordinated responses. There are two specialized units in clinics in Gothenburg (Vulvamottagningen) and Stockholm (Amelmottagningen) with teams that provide medical support and official medical documentation when needed to FGM survivors.

Good practices

- » **Integration into systems:** Sweden has embedded FGM prevention into its education and healthcare systems. Schools are staffed with professionals trained to detect signs of abuse or distress, and healthcare providers are encouraged to raise questions about FGM when appropriate. NGOs complement these efforts by providing awareness-raising sessions, although financial barriers sometimes prevent schools from accessing these services.
- » **Collaboration and Coordination:** The coordination facilitated by the Gender Equality Agency is widely recognized as a strength, bringing together stakeholders from government, civil society, and frontline services.
- » **Preventive legal measures:** The introduction of travel bans has been an important innovation, allowing authorities to prevent children from being taken abroad for FGM. This measure is now a key preventive tool in Sweden's broader strategy against gender-based violence.
- » **Role of civil society:** Civil society also plays a vital role in advancing FGM prevention and protection. Existera is particularly important in providing support to women affected by FGM. It uses a method called the "Existera Model", which combines physical activity and open discussion through a participatory approach. The organization runs five support groups in Stockholm and Gothenburg, a dedicated helpline, individual support and awareness-raising activities that also engage men. Beyond direct support, Existera provides training and educational materials for schools, clinics, and family centers.
- » Since 2016, Action Aid Sweden has been strongly committed to the work against FGM engaging closely with diaspora communities across Sweden. By providing safe spaces, spreading vital information,

27. European Institute for Gender Equality, Current situation of female genital mutilation in Sweden, https://eige.europa.eu/sites/default/files/documents/current_situation_and_trends_of_female_genital_mutilation_in_sweden_en.pdf

28. Ibid.

29. 2024 data is not available.

30. Global Platform for Action to End FGM/C report, <https://www.unwomen.org/sites/default/files/2024-11/A-79-514-Submission-Global-Platform-for-Action-to-End-FGMC-en.pdf>

31. <https://www.socialstyrelsen.se/contentassets/92515e62f1064d4e9f5f53f8bc819003/2023-6-8599.pdf>

raising awareness, and facilitating dialogue meetings between affected women and girls and key service providers, Action Aid Sweden helps to bridge critical gaps in understanding, access, and support.

- » Action Aid work extends beyond community engagement and closely collaborates directly with service providers by offering tailored materials, practical tools, and opportunities for knowledge and experience exchange. Through workshops and training, Action Aid strengthen professional awareness of FGM-related issues, equipping stakeholders with the knowledge and sensitivity required to address this complex challenge effectively.
- » Although based in Stockholm, Action Aid works at national level, ensuring that the fight against FGM reaches communities throughout Sweden. With a holistic and inclusive approach, Action Aid continues to build bridges between affected individuals, communities, and institution/service provider.

Challenges

- » Implementation gaps despite strong legal framework: Despite the robust legal framework, significant shortcomings remain in practice. Surveys conducted by the SMA and Civil Society Organisations (CSOs) have revealed significant shortcomings in assessing and investigating FGM-related claims. The Swedish Refugee Law Center continues to monitor outcomes, noting that rejection decisions often fail to adequately address risk, despite the existence of legal guidance and specialized training for practitioners.
- » Inconsistent application and trust barriers: Legal frameworks and training have been refined over the years, particularly regarding women from Somalia and Afghanistan. Challenges remain, including late disclosure, trust barriers, and inconsistent application of gender-sensitive measures across nationalities.
- » Limited and fragmented data: Another challenge is the lack of detailed FGM-related data. While overall statistics exist, there is limited information broken down by nationality (for example, there is no data on how many Somali women living in Sweden have undergone FGM). There is currently no evidence that FGM is being performed within Sweden; rather, concerns focus on cases that may occur before migration or during visits to countries of origin.
- » Risk related to travel and child disappearance: A particularly concerning pattern is that of children - both boys and girls - disappearing during summer holidays and not returning from visits to countries where FGM is practiced. Reintegrating these children into school following such absences has become increasingly difficult for authorities.
- » Cultural and medical debates: While FGM is not performed legally within Sweden, related medical procedures continue to spark debate in certain communities.
- » Shrinking civil society space: Currently, only two NGOs – Existera and ActionAid- are actively engaged in FGM-related work; others have been forced to shut down due to funding cuts and staffing shortages during Covid-19.
- » Contested terminology: Terminology also remains a point of contention. The continued use of the term “female circumcision” in official communication channels, such as the national website and the 1177 helpline³², is intended to reduce stigma but is seen by many advocates as problematic and potentially minimizing the harm of FGM.
- » Asylum and protection challenges: Regarding asylum-related aspects, FGM is not commonly cited as a primary reason for seeking asylum in Sweden, with conflict-related grounds being more prevalent among communities from Somalia and Eritrea. In cases involving Western African countries, FGM may be mentioned, but not always successfully. When a mother is opposed to the practice, authorities may assess that protection within the family is possible, which could impact asylum outcomes.
- » Need for sustained and survivor-led efforts: The visit underscored the need for continued vigilance, cross-sectoral coordination, and survivor-led approaches in combating FGM. While Sweden has made strides in integrating legal tools and institutional frameworks, the sustainability of civil society action and the amplification of survivor voices remain essential to long-term progress.

32. 1177 helpline provides medical advice on care and illness, <https://www.1177.se/en/other-languages/other-languages/sokavard/det-har-ar-1177/>

CHAPTER VII: COORDINATION, COLLABORATION AND MONITORING

Swedish context

The SMA conducts follow-ups at the unit, national, or thematic level to evaluate the quality of investigations and assessments of asylum cases. A recent example is a thematic follow-up on asylum cases where the risk of FGM was, or should have been, considered during the investigation and assessment. The follow-up indicated that the quality of investigation was high in cases where women and girls were granted asylum, but highlighted shortcomings in some cases where the need for international protection was denied.

At the local level, the SMA cooperates with various NGOs as well as with municipalities. Municipalities are responsible for providing shelters for individuals in need of protection, such as survivors of gender-based violence. The SMA also engages in cooperation with NGOs at the national level, including organizations like the Swedish Red Cross and Amnesty International.

Civil society actors maintain structured collaboration with authorities and other NGOs. Annual meetings with the Migration Agency and participation in municipal reference groups allow for dialogue on policy and procedural matters. Informal coordination among NGOs supports the review of legal and procedural developments and the delivery of training programs. NGOs are also active internationally, engaging in platforms such as the European Council on Refugees and Exiles (ECRE), End FGM Network, and the European Union Agency for Asylum (EUAA) consultative forums, as well as thematic working groups on gender, LGBTQI+, and children's rights.

Good practices

- » **Cross-sectoral coordination:** One important strength of the Swedish system is the multi-actor involvement in complex asylum cases, particularly those with gender-related claims. When legal representatives, NGOs, social workers, police, and prosecutors are engaged in the process, the likelihood that a woman's account is deemed credible increases significantly. This demonstrates the value of coordinated, cross-sectoral approaches in ensuring fair outcomes.
- » **Strong civil-society-state coordination:** Structured collaboration between civil society and state actors further enhances protection. NGOs not only provide shelters, counselling, and legal support but also contribute expertise to policy discussions. Their involvement in national and international platforms allows them to share lessons learned, monitor standards, and raise concerns at both domestic and EU levels.

Challenges

- » **Limited responsiveness to expert guidance:** Legal practitioners also expressed concern about the government's responsiveness to expert legal guidance. In some cases, proposed legislative changes were pursued despite critical feedback from the Council on Legislation, suggesting a potential gap between expert recommendations and policy implementation.
- » **Concerns regarding Dublin cases:** The processing of Dublin cases continues, even in instances where return to the responsible EU member state may not offer adequate protection or conditions. Stakeholders noted that while such decisions align with the legal framework, they can pose risks to applicants with specific protection needs, particularly in cases involving previous trauma or vulnerability.
- » **Non-institutionalized collaboration models:** While successful asylum outcomes often hinge on cooperation between multiple actors, this collaborative model is not yet institutionalized. Instead, positive results frequently depend on the initiative of individual professionals or local networks, which creates inconsistencies in protection across regions.

CONCLUSION

The Stockholm study visit confirmed that Sweden continues to foster a dense ecosystem of actors, tools, and practices that meaningfully uphold the rights of self-identified asylum-seeking and refugee women and girls - even as the policy climate grows increasingly restrictive. The visit achieved its twofold objective: it highlighted concrete, gender-sensitive practices with potential for replication across Europe, and it gathered evidence to support advocacy on pending and proposed reforms.

Across institutions, a number of strengths were observed. Sweden's legal framework formally recognises gender and sexual orientation within the refugee definition, providing an important basis for protection in cases involving gender-based violence or risks faced by LGBTQI+ applicants. At the level of procedure, the SMA offers individualised interviews and the option to request the gender of the interviewer, interpreter or counsel, measures that can lower barriers to disclosure. Access to legal aid was also noted as a key safeguard: asylum seekers are entitled to publicly funded legal counsel, and in many cases this representation plays a decisive role in ensuring that claims are fully and fairly presented. Civil society organisations further reinforce the system, with actors such as:

- » the Swedish Refugee Law Center, FARR and the Red Cross providing legal and psychosocial support;
- » City Missions and the Akalla Women's Center supporting inclusion;
- » Existera and ActionAid facilitating survivor-led spaces for women affected by FGM, engaging diaspora groups and professionals through awareness, information sharing, tools, and knowledge exchange to combat FGM nationwide;
- » the Salvation Army'sSafe Havens accompanying survivors of trafficking. Taken together, these measures illustrate how multi-agency collaboration contributes to more informed decision-making and improved outcomes for women and children.

At the same time, the reform trajectory since 2022 - framed by the Tidö Agreement and subsequent legal changes - poses structural risks to gender-sensitive protection.

- » Proposed cuts to first-instance legal aid;
- » tighter reception rules that condition financial support on SMA-assigned housing;
- » restrictions on repeat applications
- » moves toward temporary residence and tougher citizenship requirements all threaten to erode safeguards precisely where women and girls face the highest hurdles (documentation, late disclosure, dependence on abusive partners, intersectional vulnerabilities);
- » capacity gaps persist in consistent GBV-informed practice, interpreter quality assurance, safety in accommodation, data collection on grounds of protection, and sustainable funding for independent NGOs;
- » regional disparities in decision-making;
- » limited civil-society involvement in Pact implementation compound these concerns.

Overall, the study visit revealed a landscape where strong methods and committed practitioners are present, yet their impact appears increasingly contingent on the preservation and expansion of legal guarantees, resources, and coordination mechanisms amid a shifting policy environment.

The study visit pointed to several areas where Sweden's protection system for women and girls could be reinforced.

Access to quality legal assistance: Access to quality legal assistance remains crucial, particularly through sufficient time for first-instance preparation, specialised competence on gender-based violence and child rights, and flexible arrangements when trust between counsel and client breaks down.

1. **Strengthening procedural safeguards:** Procedural safeguards also need continued attention. Trauma-informed training for caseworkers, interpreters and legal representatives, together with clear communication of rights, can make a decisive difference. Small but significant measures - such as private waiting areas or childcare - help create conditions where applicants feel safe to speak openly.

2. **Improving reception practices:** Reception practices were another concern. Women-only spaces or safe supervision in mixed facilities, coupled with reliable psychosocial support, are essential. Rules linking support to assigned housing risk deepening dependence or homelessness, while early access to work remains a key avenue for inclusion.
3. **Evidence, data and accountability mechanisms:** Stronger systems of evidence and accountability could further improve outcomes. Collecting anonymised data on gender-related claims, ensuring interpreter quality, and publishing thematic reviews would enhance consistency and learning. Survivor-centred approaches to trafficking and FGM were also highlighted, with safe housing, dedicated accompaniment models, and survivor-led spaces seen as effective ways to uphold dignity and agency.
4. **Cross-cutting issues:** Stable funding for independent civil society, whose expertise and monitoring role remain indispensable, and stronger human-rights oversight - particularly by the NHRI - to ensure that legal reforms do not erode safeguards for women, children, and other disadvantaged groups.

ANNEX I – LIST OF INTERLOCUTORS

Organisation	Date	Location
National Authorities		
Swedish Gender Equality Agency	11 June 2025	Stockholm
Swedish Migration Agency	9 July 2025	Written reply
Swedish National Human Rights Institution	16 June 2025	Online
Civil Society Organisations		
Swedish Network of Refugee Support Groups – FARR	10 June 2025	Stockholm
Swedish Refugee Law Center	10 June 2025	Stockholm
Swedish Red Cross	10 June 2025	Stockholm
Delmi (The Migration Studies Delegation)	10 June 2025	Stockholm
City Missions	11 June 2025	Stockholm
Akalla Women's Center	11 June 2025 20 August 2025	Stockholm (in person), Online meeting
Existera	12 June 2025	Stockholm
ActionAid	12 June 2025	Stockholm
International Salvation Army	12 June 2025	Stockholm
Law Firms		
Fridh Advokatbyrå	10 June 2025	Stockholm
Din Advokat	11 June 2025	Stockholm
Academia		
Malardalen University	10 June 2025	Stockholm



A project led by the association France terre d'asile

AMAL: Empowerment and Protection of Migrant Women" is a three-year project (2023-2025) implemented by France terre d'asile in partnership with the European Council on Refugees and Exiles (ECRE). The Project aims to improve the realisation of migrant women's rights through a wide range of activities, including advocacy at both the French and the EU level, protection, empowerment and capacity-building activities.



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