

Annex 4

## Country Case: Sweden

Annex 4 of the of the Talent Attraction and Work-related Residence Permit  
Process Models in Comparison Countries -report

Rasmus Firon – Hennig Bollmark – Anna-Karin Gustafsson

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# 1 Introduction

Sweden is an attractive country to live and work in, which is evident from its performance in various nation brand and talent competitiveness indexes.<sup>1</sup> Sweden's strengths<sup>2</sup> in a global comparison include aspects like:

- High living standards
- High quality of life
- High quality of working life and a good work-life balance
- Good access to high-quality public services
- Equality
- Holds high standards in terms of sustainability and environmental protection as well as human rights
- Knowledge country: innovative, high-quality education and research environments
- Stable democracy
- Access to clean air, water and nature
- Well-known global brands such as Spotify, IKEA and H&M
- Sweden gets positive international media coverage through talents and famous people such as the climate activist Greta Thunberg and football player Zlatan Ibrahimović as well as globally known events such as the Noble Prize

Sweden also has a long history of immigration and the country has attracted both blue and white-collar talent for decades. Over the past century, Sweden has developed from being an emigration country into an immigration country. In a historical comparison, this development occurred in Sweden almost half a century before a similar trend

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<sup>1</sup> See for example Ipsos (2019) Nation Brand Index; Instead, The Adecco Group & Tata Communications (2019). The Global Talent Competitiveness Index 2019 – Entrepreneurial Talent and Global Competitiveness.

<sup>2</sup> See for example: The Swedish Institute (2020), Bilden av Sverige utomlands 2019 – Årsrapport från Svenska institutet 2020:1; Oxford Research (2009), Är Sverige attraktivt? Utländsk kvalificerad arbetskrafts syn på Sverige som land att arbeta och bo i.

could be observed in Finland. Today, Sweden has one of the largest immigrant populations in Europe. Approximately one-fifth of the population is born abroad, and one-fourth has a foreign background.<sup>3</sup>

Sweden is thus one of the countries in Europe that has attracted the most immigrants. Immigration to Sweden has increased significantly in the last 20 years – almost 1.5 million people migrated to Sweden between 2000 and 2014.<sup>4</sup> Over the last decades, net immigration has been significantly higher in Sweden than in Finland. The Swedish net immigration rate stood at more than 115,000 people in 2019,<sup>5</sup> compared to annual averages of between 3,000 and 18,000 in Finland since the 1980s.<sup>6</sup>

The largest group – almost half of immigrants coming to Sweden in 2019 – are family immigrants, while the second most common reason for immigration is work. Approximately one-fourth of the immigrants came to Sweden through a work permit in 2019. The third largest group, about 16% in 2019, was asylum migrants, and the fourth largest group approximately 10%, was students<sup>7</sup>.

OECD estimates that approximately 29% of the foreign-born population of working age (25–64-year-olds) in Sweden are highly educated,<sup>8</sup> which corresponds to the same share among people born in Sweden.<sup>9</sup>

In terms of labour migration from third countries Sweden attracts both low and high-skilled non-European workers. Two groups stand out: most applications for work permits are submitted by berry pickers and IT specialists. In 2019, these two occupations formed almost half of the granted third country work permits.

Thailand and India are by far, the most frequently occurring countries of origin of the third country labour immigrants. Approximately 5 000 people from each of these countries received work permits in Sweden in 2018, which together makes up half of the permits that were granted. Other common countries of origin for third country work permit holders are (in order) Ukraine, China, Turkey, Iraq, and the US, with between 500 and 1,000 labour migrants from each country coming to Sweden in 2018.<sup>10</sup>

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<sup>3</sup> SCB (2020), *Utrikes födda i Sverige*. NB: Statistics Sweden's (SCB) definition for people with *foreign background* is 'persons born abroad or born in Sweden with two parents born abroad'

<sup>4</sup> The Swedish Migration via Strömbäck (2016), *Utan invandring stannar Sverige*. Stockholm: Volantis

<sup>5</sup> SCB (2020), *Invandring till Sverige*, 20 February.

<sup>6</sup> Official Statistics of Finland (2020): *Migration*. Helsinki: Statistics Finland [referred: 30.3.2020].

<sup>7</sup> Migrationsinfo (2020), *Migrationsinfo sammanfattar migrationsåret 2019*, 24 January.

<sup>8</sup> ISCED educational levels 5–6. Data from DIOC database, cited in Almega (2019)

<sup>9</sup> Almega (2019), *Hur bra är Sverige på talangattraktion?*

<sup>10</sup> Migrationsinfo (2019), *Arbetskraftsinvandring*. 31 January.

## 1.1 The Swedish labour migration scheme – one of the most liberal in the OECD

In 2008, the government (a centre-right coalition between the Moderate Party, the Centre Party, the Liberals, and the Christian Democrats ('The Alliance')), introduced a reform of the labour migration system in Sweden. The objective of the reform was to facilitate global recruitment of labour migrants from third countries and to give employers better opportunities to recruit people with specialized competencies corresponding to their needs. An important part of the reform was the removal of the Swedish Public Employment Service's labour market testing role.<sup>11</sup>

Since the reform, the Swedish labour migration scheme has been characterised as one of the most liberal among the OECD countries.<sup>12</sup> In comparison with Finland, the criteria for receiving a work permit are less strict. The reform meant that labour market testing was abolished. Employers who wish to recruit non-European labour are still formally obliged to post advertisements within the EU/EES/Switzerland for ten days. But in practice, the employer is free to decide who to recruit.

The criteria addressing labour migrants' capacity to support their family financially are also less strict in Sweden than in Finland. As of March 2020, the general rule is that work permit holders should be able to support themselves financially (monthly gross salary should not be below SEK 13 000 (approximately €1 300) and should be also on the same level as the Swedish collective agreements or customary wage levels in the field). There are currently no requirements for labour migrants to be able to support accompanying family members.<sup>13</sup> However, Swedish authorities are currently looking into reforming this regulatory framework.<sup>14</sup>

The number of labour migrants coming to Sweden has increased since the reform passed in 2008. Between 2010 and 2017, the annual number ranged from 12 000 to 16 000. In 2019, record numbers of approximately 22 000 third country labour migrants were reached.<sup>15</sup> In an extensive review of the effects of the reform, the Migration Studies Delegation (2015) concluded: 'Two trends are evident: labour immigration in total has increased since 2008, and it has increased most evidently in certain occupations, where it previously has not been possible to obtain work permits because of

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<sup>11</sup> The Delegation for Migration Studies (Delmi) (2015), *Arbetskraft från hela världen. Hur blev det med 2008 års reform?*, Rapport 2015:9.

<sup>12</sup> See for example OECD (2011), *Recruiting Immigrant Workers: Sweden 2011*.

<sup>13</sup> SMA (2020), *Frequently asked questions about work permits*. 4 June.

<sup>14</sup> Svenska Dagbladet (2020), "Så vill vi stoppa missbruk av arbetskraftsinvandring". 4 June.

<sup>15</sup> Delmi (2015)

the authorities' earlier prerogative for prior sectoral labour needs assessment'. In recent years, Sweden has attracted both white- and blue-collar third country labour migrants.

The Swedish migration reform of 2008 has also raised concerns about social dumping, exploitation of non-European labour and recruitment of foreign labour to business sectors where no general lack of workforce can be observed.<sup>16</sup> Moreover, concerns have been raised about several cases where highly skilled immigrants are deported due to minor clerical errors (commonly known as "kompetensutvisningar", a topical debate since the reform of 2008). To deal with these challenges, some structural adjustments have been made over the last few years. For example, smaller adjustments in regulatory frameworks were made in 2017 to provide for more flexibility in policy interpretations. The main reason was to decrease the risks for bureaucracy-related deportations of highly skilled migrants.

As of March 2020, two reform packages of major importance for the Swedish migration policy are under development. In June 2019, the Swedish government assigned a parliamentary committee to prepare a special inquiry on a new migration policy framework, to be presented in August 2020.<sup>17</sup> According to the government's instructions, the Swedish migration policy framework should be humane, legally secure and effective/efficient. Simultaneously, another inquiry that was initiated in February 2020 explores how Sweden can become better at attracting highly-skilled international workforce and at preventing exploitation of immigrant workers.<sup>18</sup> For example, alternatives to the current system causing deportation of skilled labour migrants are investigated.

Additionally, along with several other reform suggestions, the introduction of a so-called 'talent visa' is being considered. All details of this scheme are still being debated. In a newspaper interview published on the 4<sup>th</sup> of April Johanna Jonsson, migration policy spokesperson for Centerpartiet, one of the parties behind the inquiry, stated the following:<sup>19</sup>

- The point of the talent visa scheme is to simplify highly qualified labour immigration to Sweden in cases where employment is likely but there is no definitive employment offer in place yet.
- The visas would be valid for a short period of time, but alternative lengths being discussed vary between a month and three years.

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<sup>16</sup> Delmi (2015)

<sup>17</sup> Regeringskansliet (2019), *Parlamentarisk kommitté ska utreda migrationspolitiken*. 14 June.

<sup>18</sup> Regeringskansliet (2020), *Utredning om arbetskraftsinvandring*. 6 February.

<sup>19</sup> Arbetsvärlden (2020), *Johanna Jönsson: Talangvisum gör det lättare att söka jobb i Sverige*. 4 June.

- The visas would allow third-country job seekers to visit Sweden to make arrangements for future immigration, for instance, to look for a job in collaboration with a recruitment company.

## 1.2 Lack of skilled workers hinders companies' growth

Like other OECD countries, Sweden is currently facing economic and demographic challenges with an ageing population and increasing needs for public services. Mismatch between labour supply and demand in both the private and public sectors is an increasing challenge. Companies recognise the lack of available competencies as an obstacle to growth, while organisations within the welfare sector express large recruitment demands. The shortage in skilled workforce is estimated to reach 100 000 people by 2024. Approximately two-thirds of the recruitments to fill are found within the welfare sector, particularly within the health and medical sectors, the education sector, and the sector for social work.<sup>20</sup> Meanwhile, the foreign-born population constitutes a large and important part of the Swedish workforce and many businesses are completely dependent on recruitment from abroad. For example, about one-third of medical doctors and university teachers in Sweden are foreign-born. Approximately half of all hotel and office cleaners are foreign-born, while the corresponding portion of the bus and train drivers is 38%.<sup>21</sup> As an increasing number of sectors are experiencing difficulties in finding the right competencies; the retention, attraction and mobility of talent has started featuring more and more in the Swedish labour market policy debate.

## 1.3 Efforts to coordinate talent attraction measures

Currently, a coherent national strategy for talent attraction and retention is missing in Sweden. However, many different actors are involved in related activities. Concerning labour migration, the main focus of government policy measures has, according to the Swedish Agency for Growth Policy Analysis,<sup>22</sup> been to shorten the Migration Agency's

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<sup>20</sup> The Swedish Employment Service (2019), *Var finns jobben? Bedömning för 2019 och på fem års sikt*.

<sup>21</sup> SCB (2015) *Var femte frisör är utrikesfödd. Yrkesregistret med yrkesstatistik 2013*. Stockholm: SCB, in Strömbäck (2016)

<sup>22</sup> Tillväxtanalys (2019).

permit processing times, to smoothen the authorization process and to increase the quality of the services offered by the agency. Considering the large immigration flows that Sweden has experienced in recent years, especially since 2015, the principal activities have served to secure a well-functioning and effective regulatory framework.

As the problems related to difficulties with finding qualified workforce increase, a large number of Swedish actors have underlined the need to develop a national strategy for talent attraction.<sup>23</sup> Currently, the primary policy document of relevance for the field is the government's new export- and investment strategy, which was released in December 2019. In the strategy, talent attraction is mentioned as one of five prioritised focus areas and the government suggested the following related measures:

- The branding of Sweden as a modern economy and as an attractive country for both investments and highly-skilled migrants should be strengthened by branding with an increased focus on innovation and sustainability.
- An investment in an accelerator program should be introduced to strengthen foreign talent attraction and to recruit more entrepreneurs to international startups and scale-up enterprises in Sweden. This will be done by reinforcing the promotion of Sweden as a nation that values knowledge and supports startup businesses.
- Investigation of opportunities to introduce a common support function for attracting international competence in collaboration with selected municipalities: the objective of this activity is to guide high-skilled foreign employees in practical matters related to their establishment in Sweden. The guidance follows a model used in other Nordic countries.

While implementation is still in an initial phase, a number of measures have already been undertaken by giving various Swedish agencies the assignment to focus on the strategy content. For example, two so-called International Houses, gathering representatives for Swedish agencies in a one-stop-shop, will be opened in Stockholm and Gothenburg before the end of 2020.

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<sup>23</sup> See for example Tillväxtanalys (2019), Den globala jakten på kompetens – statens roll; Teknikföretagen (2019) Talangattraktion Förslag för ett välkomnande och konkurrenskraftigt Sverige; Almega (2019), Hur bra är Sverige på talangattraktion.



### 1.3.1 Coordination of the Sweden brand

As the preceding chapter shows, many different actors are involved with talent attraction activities in Sweden, but without an overall cohesive strategy. For example, several public agencies, regions and municipalities, employer and business organizations and individual enterprises all undertake various activities to attract foreign labour to Sweden. In part, this implies that the Swedish authorities have not yet decided on any strategic priorities in terms of occupations, countries or regions that should receive to primary focus when attracting foreign workforce to Sweden. Such an analysis is, however, currently being undertaken by the Swedish Institute.

One of the most important actors in the field of talent attraction is the government agency **Swedish Institute** (Svenska Institutet). The agency has a broad mission, formulated as follows: "The task assigned to [the Swedish Institute] by the Parliament and the Government is to promote awareness of, interest in, and trust in Sweden abroad; to increase cooperation in Sweden's vicinity, and to facilitate democratic, equitable and sustainable global development".<sup>24</sup> To fulfil this mission, the agency, for example, produces yearly investigations of the images of Sweden abroad through comprehensive media monitoring activities. Moreover, the agency maintains several of the most frequently visited online platforms serving to attract people abroad to move to Sweden, such as:

- [www.sweden.se](http://www.sweden.se)
- [www.studyinsweden.se](http://www.studyinsweden.se)
- [www.workinginsweden.se](http://www.workinginsweden.se)

The information on these public platforms is available in different languages, including English, Arabic, Russian and Chinese. Together with the Swedish Institute's social media channels, they attract many online visitors. For example, the agency has approximately 2.2 million people following their social media accounts. Also, around 3.3 million visitors accessed the agency's website in 2019.<sup>25</sup>

Since 2020, following the new focus on talent attraction in the Swedish export and investment strategy, the Swedish Institute has been assigned a special assignment to focus on attracting highly-skilled foreign workforce to Sweden. Several measures have been taken to fulfil the strategic goals within this area. Currently, the focus is to establish collaborations between actors on different levels in the Swedish system and to analyse what segments to primarily address with the promotion activities.

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<sup>24</sup> Svenska Institutet (2020), *Vår strategi och verksamhetsidé*.

<sup>25</sup> Svenska Institutet (2019). *Årsredovisning*.

Despite the general lack of coordination, one positive example of how different public authorities have collaborated already for several years in their work with promoting the image of Sweden abroad is **the Council for the Promotion of Sweden** (*Nämnden för Sverigefrämjande i utlandet*). The council is a forum for dialogue between several public actors involved in promoting Sweden abroad and it gathers communication managers from the following agencies and actors:

- The Ministry for Foreign Affairs
- The Ministry of Enterprise and Innovation
- The Ministry of Culture
- The Swedish Institute
- Visit Sweden
- Business Sweden

The council agrees on how to promote the country brand of Sweden. It has also developed a visual profile to be used by the Swedish authorities in their business and cultural promotion activities. The idea behind the visual profile is that the country brand will be strengthened as more unity is accomplished and as a number of specific values are allowed to guide the communication with foreign actors. The Council for the Promotion of Sweden is oriented towards value-based communication and towards communicating Sweden's strengths (e.g. in gender equality, environmental protection and human rights). This results in a set of resources, such as the online platform [Sharingsweden.se](https://www.sharingsweden.se), where a set of value-based toolkits for country branding distributed by the Swedish Institute may be accessed for free.

## 2 Permit system models for talent attraction

Third-country citizens generally need to obtain a work permit before moving to Sweden. If the applicant is granted a work permit for longer than three months, they will also obtain a residence permit without a separate application<sup>26</sup>. In the application process, the work permit is granted first and only after that decision the process of applying the residence permit is started.

### 2.1 Work permit requirements and exemptions

When an employer wants to recruit an employee from outside the EU/EEA/Switzerland, the following general requirements apply. (Note that these do not include any sort of positive list of certain professions or fields. Such a system has some implications for exemptions from the general rules through, see the list of exemptions below.)

- Before a job can be offered to an individual from a third country the position must be **advertised in Sweden and EU/EES/SUI for a minimum of ten days**. Note that there is no labour market testing – the Swedish model is demand-based, and the employer has the right to choose who to hire.
- The employer must offer a **reasonable salary and terms of employment** and intend to provide insurances
- The employer must offer enough work for the employee to support oneself (**at least 13 000 SEK/month**, approximately €1 230 before taxes, as of 2020)
- The employer must complete an offer of employment and **allow the relevant trade union to provide a statement** of opinion regarding the terms of employment.

It is the employer who initiates the process by submitting an offer of employment at the Swedish Migration Agency's (below referred to as SMA) web portal. No exact fig-

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<sup>26</sup> <https://www.migrationsverket.se/English/Private-individuals/Working-in-Sweden/Employed/How-to-apply.html>

ures on typical processing times are available, but as of March 2020, the agency estimates that it takes 4–6 months for a regular work permit process to go through the system.<sup>27</sup>

There are several cases where exemptions from the general work permit requirements apply. These include:

- **Researchers** are exempt from the requirement of a work permit (but they need a residence permit if they stay exceeds three months). There is also an exemption for researchers who have a residence permit for research in another EU country and will carry out part of their research in Sweden with an approved research funding body. The exemption is valid for a maximum of 180 days during a 360 day period.
- For **intra-corporate transfers** (ICT) from outside the EU to Sweden specialists can apply for an ICT permit giving them the right to travel into, stay and work in Sweden. This system overlaps with previous, kept-on Swedish regulations, but takes precedence over them; people who can apply for ICT permits are not allowed to apply for a normal work permit.
- Residence permits (allowing a stay that exceeds three months) available for **start-up self-employed** who meet certain criteria (e.g. financial capital of at least 200k SEK, being able to show business experience, relevant language knowledge, etc.).
- The main rule is that you have to apply for a work permit before you enter Sweden. For certain jobs that are on the "**list of occupations that are experiencing labour shortages**", it possible to apply for a work permit when already in Sweden, with some other criteria. This enables you to go visit a company that has an urgent need to hire and then apply for a permit without going back first, to speed up the process. The Swedish Migration Agency keeps and regularly updates this list (at least twice a year during the last few years), in coordination with the Swedish Public Employment Service and with a possibility for remarks to be made by employers' associations and labour unions before each update.
- The **EU Blue card** system overlaps with Swedish regulations. Work seekers can choose to apply for either a Blue card or a normal work permit. The number of granted EU Blue cards has been low in Sweden – less than 40 annually since 2012.<sup>28</sup>

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<sup>27</sup> This figure is based on [typical processing times](#) for third country immigrants who apply for their first work permit as an employee. The information is filled in by Internet and no further investigation has been done by SMA. The employee is not working in a sector which is subject to more strict regulation. The employer is not a certified employer.

<sup>28</sup> Eurostat EU Blue Cards by type of decision, occupation and citizenship. Last updated on 20/02/2020 and extracted on 27/03/2020.

- Certain occupations, such as **performers, au pairs, berry pickers, seasonal worker, athletes or coaches, trainees and volunteers**, are subject to specific rules. For berry pickers, these rules primarily mean special requirements for employers related to the nature of berry picking work, like the obligation to pay the promised salary, even if the employee cannot pick enough berries to finance it, or if there are too few berries to be picked. These rules also apply to employees working in connection to the berry picking (e.g. interpreters, chefs and mechanics). For seasonal workers the special rules mean that an applicant must have accommodation guaranteed before applying, intend to leave Sweden after the permitted period of time. The application process of berry pickers and seasonal workers is similar to that of other labour migrants.<sup>29</sup>

In the table below, the number of work permits granted to third country immigrants between 2017 and 2019 are presented, broken down by area of work. The two largest groups are 'Technicians and associate professionals', in which the Swedish Migration Agency classifies berry pickers and other blue-collar workers, and 'specialists', including IT architects, systems analysts, and test managers and other white-collar specialists. Other large groups include workers in the restaurant industry.

**Table 1. Number of work permits granted by area of work 2017–2019**

Area of work	2017	2018	2019
Administration and client information	304	428	411
Agriculture, gardening, forestry and fishery workers	434	528	787
Construction and manufacturing	839	1 491	1 579
Machine manufacturing and transport	137	327	335
Managerial professions	465	401	408
Military professions	7	8	4
Professionals*	982	1 524	1 745
Service, care, and sales	1513	1 970	1 696
Specialists**	6 235	7 059	6 547
Technicians and associate professionals***	4 586	7 036	8 414
Others	50	69	24
<b>TOTAL</b>	<b>15552</b>	<b>20841</b>	<b>21950</b>

Source: [The Swedish Migration Agency](#). The figures cover all granted work permits, broken down by business area (excluding athletes, artists, au-pairs, self-employed, visiting researchers, trainees, holiday workers or relatives of employees). The figures cover the decisions of the Swedish Migration Agency, the Embassies and the Consulates of Sweden.

<sup>29</sup> SMA (2020), [Special rules for certain occupations and citizens of certain countries](#). 4 June.

\* Professionals include various blue- and white-collar occupational groups, the largest in 2019 being 'Physical and engineering science technicians' with 921 people.

\*\* White-collar occupations. Largest group 'IT architects, systems analysts, and test managers' (4,347 in 2019)

\*\*\* Mainly blue-collar workers. Largest group 'Berry pickers and planters' (6,162 in 2019), second largest 'Fast-food workers, food preparation assistants' (1,141 in 2019)

## 2.2 Students

For students at higher education institutions, the main requirements to obtain a residence permit for stays longer than three months, are the following:<sup>30</sup>

- You must have a valid passport.
- You must be accepted into a course of full-time study in higher education.
- You must have payed your first tuition fee instalment.
- You must be able to support yourself during the period for which you are applying.
  - The living expense requirement for applications received by the Swedish Migration Agency after the 1 January 2020 is at least SEK 8,514 per month. If you can show that you receive free housing and/or food through the higher education organiser or an organisation that works for international exchange, the monthly amount can be reduced by SEK 1 655 for free food and SEK 1 655 per month for free housing.
  - When applying online you verify that you have the required funds through *“an account statement that verifies that you have sufficient funds for your living expenses. If permission from a central bank or the equivalent is required to take out the money from your country, you must include such a permit, or documents issued in your name that show that you have been granted a stipend or the like with information on the monthly amount and the period during which you will receive the money.”*<sup>31</sup>
- You must obtain or have applied for a comprehensive insurance policy.

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<sup>30</sup> Several exceptions to the main rule. Full list of requirements is found at [SMA's website](#)

<sup>31</sup> SMA (2020), [Residence permit for studies in higher education](#). 4 June 2020.

## 2.3 Application forms and fees

There is a single application form for all third-country labour migrants applying from outside Sweden. Self-employed, au pairs and researchers from an exception<sup>32</sup>. It is possible to submit an incomplete application, but it will prolong the processing time. Application fees for work permits vary between SEK 1 500 and 2 000 (approximately €150 – 200).<sup>33</sup> The application is not to be sent in until the individual has paid the fee. Individuals can get the money back if they have paid the wrong application fee. If they have applied online or on paper, they can contact the Migration Agency and request the money back, and if they have submitted their application to an embassy or consulate-general, they contact them. An application fee will not be refunded if the application is refused.

The majority of work permit applications are received through the SMA's digital application system. As of June 2020, this year's numbers add up to 91% digital and 9% paper applications<sup>34</sup>. Applications from certified employers (see sections 2.4–2.5) are required to be digital, while other applicants are informed of the possibility through the SMA's website.

## 2.4 Certified employer model

The Swedish *certified employer* system was introduced in 2012 as a pilot project against a backdrop of two challenges. First, processing times for work permits at the Swedish Migration Agency were considered too long. Second, a growing number of companies reported that the lack of skilled workforce was an obstacle to company growth, and the need to recruit foreign workforce was growing.

The aim was to create a fast-track system for work permits by speeding up the application process for trusted employers with a regular need for workforce from third countries. Complete applications from certified employers are processed by the Swedish Migration Agency within ten working days for new applications and within twenty working days for renewals.

In principle, the certified employer scheme is an agreement between an employer and the Swedish Migration Agency that allows for faster processing. The basic idea of the

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<sup>32</sup> A full list in English of all work permit application forms is available [here](#).

<sup>33</sup> SMA (2020), [Work permit application fees for employees, self-employed and their family members](#). 10 June.

<sup>34</sup> Email communication with SMA, 10 June.

scheme can be described as a screening process where the agency finds the employers which are most likely to submit complete and eligible work permit applications that can easily be granted a permit. When it comes to recruiting workforce from third countries, certified employers are required to abide by the same rules as any other employer.

Certification means that an employer needs to meet certain criteria.<sup>35</sup> (Note that these criteria do not specify field or professions, as the certification scheme is open to all types of employers.) The employer needs to:

- Be registered as an employer.
- Have the funds to hire. This is verified by assessing the company's financial situation when they apply for certification and revised on a case-by-case basis every time the employer submits an employment offer in connection to an application for a work permit.
- Have a recurring need in the coming year to recruit workers from a non-EU country.
- Have had at least ten work permit applications in the past 18 months (newly started businesses with a recurring need for labour can be certified even if the company has not previously applied for work permits).
- Take responsibility for submitting web applications that are complete.
- Have fulfilled the requirements for residence permits and work permits if the employer has previously recruited labour from a non-EU country. The Swedish Migration Agency has a database in which previous cases can be checked.

There is no public list of all the certified employers, but many of the companies use this feature in their marketing. Therefore, the information on this is rather easy to find online. The number of certified employers has grown in recent years. According to the Swedish Migration Agency, a total of 670 employers expressed interest to become a certified employer in 2019. On average, the agency received 140–200 applications per application period in 2019 which occurs quarterly. Of these, 39% (equivalent to 264 employers) met the criteria and were certified.

Today, the fast-track system covers a large share of all work permit applications. In 2019, the agency received a total of 39 200 work permit applications through the fast-track scheme (including residence permit applications for family members). This represents approximately 42% of all work permit applications in 2019.

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<sup>35</sup> SMA (2020), [Become a certified employer](#). 4 June.



The majority of all work permit applications come from a few companies. No exact numbers are available but the Swedish Migration Agency estimates that approximately 30 actors submit a majority of the applications. There are also a number of companies that have been granted the certification status but have never actually needed to recruit employees from third countries. The agency has also noted that some of these certified employers are now represented by other companies.

There have been some minor adjustments in the scheme during the eight years it has been active: in 2015, the scheme was extended so that so-called relocation companies could also be certified. The criteria on the number of annual applications needed in order to be eligible for the scheme has been revised several times. Initially, it was at least 25 applications. In 2017, the requirement changed to "recurring need" without any specified number. This was done in order to open up the system for small companies too. In March 2020, the requirement was again revised, this time to ten applications per year.

## 2.4.1 Certification of employers

Certification takes place four times a year. The process includes the following steps:

1. The **employer expresses interest in certification** by e-mail. Certain criteria must be met, and specific documents must be attached (for example, annual financial statements). A certified employer can also represent other companies (this is increasingly the case – specialised companies handle the whole process)
2. The SMA goes through the documents and **decides whether it meets the criteria** ('is it likely that this company will submit complete and eligible work permit applications which are easy to approve?')
3. The SMA **certifies the company if the criteria are met**. New certifications take place in March, June, September and December.

## 2.4.2 Lessons learned so far: stakeholder perspectives on the certified employer scheme

The certified employer scheme has not been officially evaluated. To investigate the actual functioning of the scheme we conducted phone interviews with different stakeholders: the responsible unit handling the process, relevant social partners on both sides and a certified company (see the list below).

- Government agency perspective: the Head of Unit at the **Swedish Migration Agency**
- **Trade union:** The Swedish Association of Graduate Engineers (Sveriges Ingenjörer), Sweden's largest white-collar trade union for engineers.
- **Employer organisation:** Almega – Employers' Organisation for the Swedish Service Sector, a large organisation in the service sector that since the beginning of 2019, has worked as a certified employer processing application on behalf of their member companies.
- **Certified employer:** Deloitte, an accounting company that became certified at the very beginning of the scheme and has since sold the handling of the application process as a service to various (mostly private) employers, much like a number of other so-called "provider" companies that have either sprouted up to operate on this market or, like Deloitte, themselves expanded into it from an established platform in some other business.

Below is a compiled account of the information and views they provided to us from their different perspectives; first, a section focusing on various aspects of the system's practical functioning, and then a short discussion on its fundamental legitimacy. The actors all generally agree that the core function of the system, to speed up the immigration of highly qualified labour migrants, is a good one, as well as on the broad strokes of how it should function and what its goals should be. The union representative did want to raise a discussion about the appropriateness of having a publicly sponsored fast-track system, and the two certified actors disagreed somewhat on the pros and cons of a few technical aspects while both emphasised the importance of predictability to maximal benefit.

Note that the SMA, for project-practical reasons, did not get a chance to comment upon the remarks made by stakeholders in the two sections below. The picture painted might have been somewhat different had they done so, since some variation between the perspectives of the three interviewed actors is already visible.

#### 2.4.2.1 The process: social partners on both sides have made critical remarks on how the system works in practice

One of the practical aspects of the system most discussed by our interviewees was the **involvement of the unions in the process**. The reason for this corporatist element in the scheme is the union's detailed insight into relevant practices and rules in the Swedish labour market. Unions are involved to effectively and efficiently handle the validation stage of job offers and to prevent social dumping.

The interviewed union representative had the following thoughts on the inclusion of a “third party” like the unions. The certification scheme is, to some extent, based on a level of institutional trust shown toward the applying employers. They are given access to this advantageous fast-track system based, in part, on an assumption that they will continuously submit applications with every legal requirement already considered, lifting some of the investigative burdens from the SMA officers and thus helping to achieve the very short processing times.

When everyone does their part correctly, this trust mechanism is one of the system's strengths, but it can easily become a weakness if it is exploited. According to the union representative, the SMA does not, have enough knowledge in labour and insurance law to do effective individual background checks for information required for the applications in the more complicated cases, for instance, when the insurance for a suggested employee is paid in another country as part of previous employment (this alleged lack of SMA legal competence in other fields than that of migration was also brought up by the interviewed employers). In these cases, the SMA allegedly cannot verify that the information provided to them is correct and generally just accepts what information the applying employers provide, in contrast to when processing applications for extensions of work permits where the background checks regard employment in the more familiar Swedish context. This could be problematic since both the applying employers and employees have an interest in widening the definition of what is acceptable according to the interviewee. The latter in part since many individuals who make use of this scheme allegedly do not view migration to Sweden as a permanent move but rather as a temporary gig and are therefore not incentivized to place high demands upon their employment conditions, and in part since even when they do intend to stay long term risk losing the job opportunity by placing too high demands.

The employer interviews suggest that certified employers are somewhat critical, not of the very inclusion of the unions in the process, but the way their part currently functions. Three points were made. First, according to the Almega interviewee, the unions' processing time of many job offers sometimes become too large a portion of the total application time. Second, according to the Deloitte interviewee, their judgment is not always perceived as fair since their internal process is not transparent, making it hard for the applying employers to argue any specific point or learn from denied cases. Third, according to the Almega interviewee, there have been cases where unions have declined to partake in the process as a validator of specific job offers, making it necessary for the applying employers themselves to try to provide acceptable proof of the soundness of the offers. In this sort of case, companies have experienced that the SMA does not provide the necessary instructions on how to proceed, resulting in severely delayed cases.

The union interview also suggested that the current statement of opinion process does not function optimally in some technical senses; the unions' statements of opinion still need to be handed in physically to the SMA, which was described as a relatively major administrative burden since there are large amounts of applications to process (for example, The Swedish Association of Graduate Engineers currently produces around 600 statements of opinion per month). The unions and certified employers have allegedly been promised a digitalization of the whole process by the SMA since 2008, but with this step still lagging behind in physical form.

The specialist provider company Deloitte made a point regarding **the collection process of the employee's part of the application** (personal documentation etc, see section 3.1.2). Allegedly, employers' organizations who handle this process on behalf of their member companies tend to only provide assistance to their members, the employers, and not the intended employees. This would go against the original idea with the certification scheme, which was to collect applications that are guaranteed to be correctly put together and thereby easy to process. This requires a high-quality handling of gathering both the forward-looking material from the employers (the job offers) and the backwards-looking material from the employees (their background information). By letting the individuals handle their part themselves high quality is no longer guaranteed. Note that the inclusion of employers' organizations in the certification scheme is a relatively recent development; the first one, Teknikföretagen, was certified in 2018, so this sort of newly discovered problem might therefore be addressed soon.

**The requirement to submit complete applications** is perceived somewhat differently by different actors. The employer organization interviewee described the requirement as clear and well communicated, with information on what an application is required to contain being readily available for active and interested recipients, like the certified employers are supposed to be, to receive. The Deloitte interviewee (note: whose organization have been involved in the scheme for far longer) described how the SMA practices have sometimes changed before the formal rules being changed in the same direction and without information being provided to certified employers, causing some confusion about what is expected of them.

The core objective of the scheme, to process applications in under ten working days, is reported by the interviewed actors as being achieved in a large majority of cases. But both interviewed employers emphasized the **importance of predictability for the value of the system being realized to its' maximum**. Even if the share of applications from certified employers being processed in under ten working days is high as it stands, it is still not high enough for the scheme to be perceived as predictable by them; if the share was increased just a bit further, the value of the rest would rise greatly since employers could feel safe enough to generally plan operations around

the expected arrival of their new asset. Currently, this level of trust is not completely achieved since several factors according to our interviewees sporadically cause delays in application processes even when the normal process is expected:

- When the unions are slow to hand in their statements of opinion, as described above.
- When the SMA unexpectedly (to the applicant) changes its practices or requirements as described above.
- When SMA officers lack the required legal knowledge to take decisions without collecting a second opinion, for instance about applications for work permits in sectors where practices divert from the “normal” employment structure, like salary models in the labour hiring industry who can be completely in accordance with what has been collectively bargained by the social partners but still look strange to someone with only basic knowledge of the field. Worth noting here is that this general critique of the SMA’s legal knowledge is not directed at the certification unit handling the scheme in itself, who one interviewee described as very competent, but other parts of the agency.

#### 2.4.2.2 The system’s fundamental challenges according to stakeholders

Through these interviews, a few points were brought up that together constitute a fundamental discussion of whether or not the system is a good one at all, in a variety of aspects. In this section we will go through these aspects, ending with a look towards the latest modifications to the system that has taken place and if they might provide an answer going forward.

Possibly the hardest to answer of these questions was raised in the interview with the union representative and asks whether it is proper for a Swedish government agency to offer this sort of ‘special treatment’ to some and not all actors in a field. This could be considered problematic in two ways. The first one is a fairly basic legal problem. One of the cornerstones of administrative law, mentioned in the Swedish constitution, is the principle of equal treatment stating that similar cases should be treated similarly by all public actors. From this observation in itself it is possible to criticize the certification scheme.

The second problem is the practical result of the fast-track system: that this division of employers into certified and not certified enables for a competitive advantage in the market that would not be possible otherwise. Small companies for whom it is not practical/possible to become certified themselves, for example, suffer a disadvantage toward big, directly certified companies when it comes to attracting highly qualified talent from abroad. They might hire a specialist provider like Deloitte to make up for the

disadvantage, but that means they had to pay extra only to regain the same relative, competitive power that they already had before the system. Indeed, both their and the bigger rival's work permit costs have been diminished, but it is hard to effectively measure this systematic gain against the systematic loss of less effective competition.

Something that might help make sense of this problem is to explore whether there is a direct negative relationship between the fast-track system and the normal processing system. If the SMA allocating processing resources toward this special "pile" of cases causes them to process other cases slower, then the unfairness-related criticism is accentuated. If not, it might be more tolerable. When asked about their views on this, our interviewees were all uncertain if such an effect exists. The Deloitte representative explained their understanding of how the system is at least supposed to work, with dedicated handling of a specific type of cases increasing effectiveness and therefore rather off-loading the SMA's general system. Since the certification scheme was introduced, the processing times of non-certified applications have been affected by many other factors, one major factor being the refugee crisis of 2015/2016. More direct investigation of the SMA's internal workings would be necessary to answer this question with any certainty.

Leaving this difficult discussion aside, if we accept that the system is in place – how can its structure be optimized? An important question is which types of actors should have access to it and be able to become certified. An argument for the inclusion of employers' organizations in the scheme was given in the Almega interview. A central problem of the certification scheme is the relative difficulty of consistently handing in a complete application. Allowing employers' organizations to assist their members with this allows for dedicated and highly qualified personnel to work with applications from companies who don't have such resources in-house, without them having to go to a specialist provider, eliminating some of the unfairness criticism raised by the union representative. But many employers, private and public, are not members of employers' organizations and are thus still affected.

The problem raised by the Deloitte interview, that employers' organizations involved in the scheme are allegedly not taking care of the employee-related part of applications as well as the employer-related parts, still stands as well. Assuming this is the case, whether it is a structural issue in the sense that employers' organizations are inherently too far removed from the individual to be able to effectively relate to their perspectives and needs or a completely solvable problem is an important question that remains unanswered. On the policy level too, such questions are being asked continuously, with the regulation of the certification scheme having been revised repeatedly since the system's inception. What version actors on this level finally arrive at, if a period stable enough to call "final" ever comes, remains to be seen.

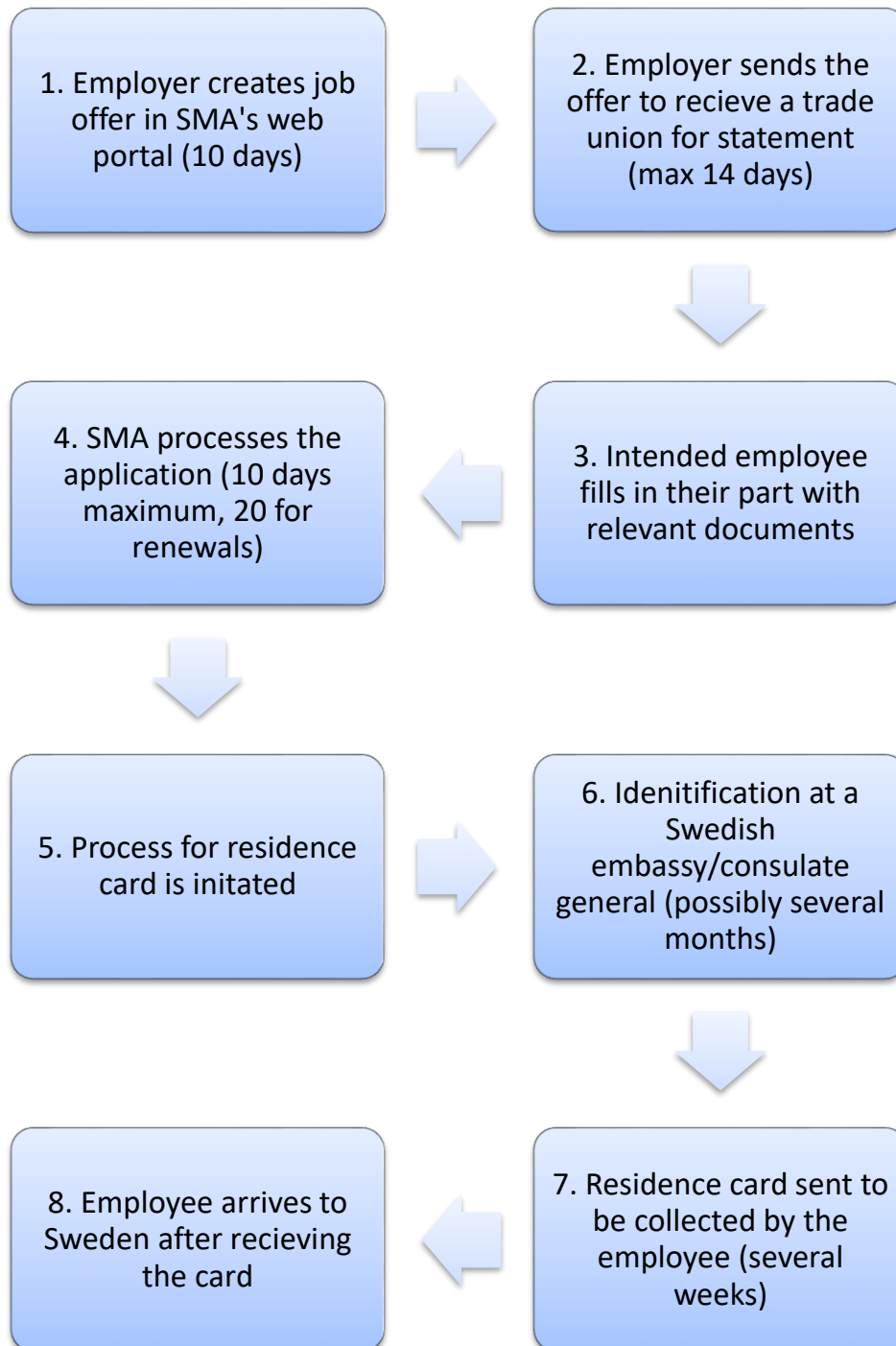
## 2.5 Permit process for certified employer

In general, the same rules apply as in 'normal' work permit application processes. The only difference is that an applicant can grant the certified employer power of attorney so that the employer can represent the applicant in the process.

Below we have presented the process when a certified employer recruit from outside EU/EEA/Switzerland step-by-step from the employee's point of view. The time it takes to go through the process varies greatly, but mostly for individuals immigrating from countries requiring a visa for entry into Sweden, since the waiting time to visit a Swedish embassy or consulate general to leave your biometry and if necessary partake in an interview depends on the resources of the embassy/consulate general in question, see list below.

The main benefit of the certification scheme is thus the decreased processing time of the work permit application at the SMA (from the usual 4–6 months mentioned above to 10/20 days), while the residence card process may remain relatively time consuming.

**Graph 1: Application process in the certified employer model for a non-EU/EEA citizen who needs a visa to enter Sweden applying through**





Below follows a more thorough than the figure above description of the process of work immigration from a third country into Sweden through the certified employer scheme.

1. General requirements for the employer who wishes to employ people from non-EU countries apply (see chapter 2.1). The employer must:
  - advertise the position in Sweden and EU/EES/SUI for a minimum of ten days
  - offer reasonable salary and terms of employment + intend to provide insurances
  - offer enough work for the employee to support oneself (at least 13 000 SEK/month, approx €1,230 before taxes)
  - complete an offer of employment and allow the relevant trade union to provide a statement of opinion regarding the terms of employment.
2. The **employer initiates the process** by completing an offer of employment at SMA's web portal (including, among other things, information about the company, the position and the person you intend to employ).
3. The **employer sends the offer to a for the sector in question relevant trade union**, for them to provide a statement of opinion. If the statement is not sent to the SMA in connection to the work permit application the union is given 14 days to provide it, or the application will not be considered complete, with longer processing times as a result (with 4 months set as benchmark). The statement is used as a basis for the SMA's decision to approve or disapprove of the salary and terms of employment of the offer. These aspects generally need to match Swedish standards, or the application will be denied. There are stricter criteria for certain industries such as HoReCa, cleaning and construction.
4. The **employee fills in his/her part** (including a passport copy for initial identity verification, and – if applicable – details about family members).
5. The **employer submits the offer of employment through SMA's web portal**. Along with relevant union's statement of opinion and the employees personal documentation, the offer must also include a statement of intent to provide insurance for the employee as well as to offer enough work for the employee to the support themselves (at least 13 000 SEK/month, approximately €1,230 before taxes). Some of the other required parts of the application are information about the company, the position and the person you intend to employ.
6. **SMA processes the application**. If the application is correctly put together and the intended employee is not considered to require extra investigation, this should be done within ten working days (for new applications) or twenty (renewals).
7. The **employer gets an email when the decision is made**. The employee will receive an email confirming that a decision has been made.

The actual decision is given to the employee by the Swedish embassy or consulate-general in their country. If the employee is in Sweden, the decision will be sent by mail to the address they have stated.

8. The process with the **residence card** is initiated – this process depends on the country and case in question and can take several months.
  - If you do not need a visa to travel to Sweden, you will be photographed and fingerprinted in Sweden at SMA. If you were photographed and fingerprinted at the Migration Agency your card will be sent to your home address within a week.
  - The card has a computer chip that contains your fingerprints and a photo of you.
  - If you need a visa to travel to Sweden, you must visit the Swedish embassy or consulate general to have your picture and your fingerprints taken. How long it takes to get an appointment varies between embassies/consulates general; it may take just a few weeks or several months. At some embassies/consulates general you do not need to book an appointment at all.
  - At some embassies/consulates general the biometrics are taken in connection to the lodging of the application and undergoing of an interview. Interviews at this stage are held by the embassy/consulate general in some cases/countries per decision by the SMA. Waiting times for these interviews also vary greatly between embassies/consulates general, from a few weeks to several months.
  - It may take up to four weeks to make and deliver the card to the embassy/consulate general. How the card is sent to you depends on the embassy/consulate general. At some embassies/consulates general you are expected to visit and retrieve it yourself or through an attorney.<sup>36</sup> In others you may have it delivered to your home address.<sup>37</sup>
9. The employer notifies the Swedish Tax Agency.
10. The employee arrives in Sweden, together with a residence permit and passport, finds a home, registers with the Tax Agency and other relevant authorities and starts working.

## 2.5.1 Family members of applicants using the certified employer track

The general rule that the same rules apply in the certified work permit application process as in 'normal' work permit application processes also applies to family members. For these individuals the process is, in essence, the same. The most important questions for them are whether the employee already has their work permit or not and how

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<sup>36</sup> Sweden Abroad (2020), [Working in Sweden](#). 11 June.

<sup>37</sup> VFS Global (2020), [Additional services](#). 11 June.

long remains of that permit's time. If they do not have a work permit already, the (intended) employee and their family members apply for their respective permits together, and the applications are in general also processed together. In the more uncommon case where the employee already has a work permit the family member/s apply on their own. In these cases the same requirements and conditions apply.

In short, the requirements and conditions for accompanying family members to third-country citizens with work permits are the following (note that these points do not include a general requirement to be able to support your family members. See section 1.2):<sup>38</sup>

- You can get a residence permit for the same time period as the work permit in question. If this permit is for more than six months, you can also get a work permit.
- The following are counted as family members: wife, husband, cohabiting partner, registered partner and unmarried children under the age of 21. In certain cases, unmarried children who are 21 years or older can be given a permit – the requirement is that they are being supported financially by you or your partner.
- You can apply digitally or through a paper form. The application must have enclosed the following documents:
  - Copies of the pages in your passport showing your personal details, the passport's period of validity and whether you have residence permits for countries other than your home country. If your passport is about to expire, you should renew it as you cannot obtain a permit for longer than the validity of your passport,
  - a copy of a marriage certificate or the equivalent (applies to married couples and registered partners),
  - proof of national registration, a lease or proof of purchase for your residence, or another document showing that you have been living together in your home country (applies to cohabiting partners), and
  - a short letter from the person in Sweden in which they confirm that you are going to live together in Sweden if you are not applying for a permit at the same time.
  - Personal documentation regarding any accompanying children under the age of 18.

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<sup>38</sup> SMA (2020), [Permits for a family member of a person who has a work permit](#). 10 June.

## 2.6 Identified bottlenecks in the permit process and possible solutions to them

As mentioned in section 2.4.2.1, a bottleneck in the work permit application process is the requirement for a statement of opinion by a relevant trade union, being present to prevent social dumping but slowing down the process due to, according to the interviewed union representative, the administrative burden of handling large amounts of physical paperwork. As was also mentioned, a digitalization of this process has been in the works since 2008 according to the interviewee, but thus far with no results; the unions must still print, sign and physically mail their statements to the employers before these can send present their job offers to the SMA.

To decrease the time of processing residence permit applications for family members of individuals with a residence permit the requirement of oral investigation of the applicants (i.e. interviews) was recommended to be removed by a public inquiry in 2005, since it was deemed to be unnecessary in many cases by the Swedish embassies and consulates general who mostly hold these interviews.<sup>39</sup> The same general problem is present in labour migration related residence permit applications from individuals from visa-requiring countries, as mentioned in section 2.5; the administrative burden on the embassies/consulates general in these countries is a big reason for hiring from abroad may take time even for certified employers.

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<sup>39</sup> SOU 2005:14, Effektivare handläggning av anknytningsärenden. 11 June.

## 3 Special focus areas in Sweden

In the Swedish case, we did extensive research on the certified employer model and the efforts to coordinate talent attraction measures. The results have been described above in chapters 2.4 and 1.3 respectively. In addition, we focused on the activities on promoting the Swedish higher education institutions for foreign students and researchers.

### 3.1 Sweden as a knowledge country – promoting Swedish higher education institutions for foreign students and researchers

Sweden introduced tuition fees for third-country students in 2011. An evaluation<sup>40</sup> of the reform shows how the number of international 'freemover' students, which had been rising rapidly before the introduction of the tuition fees, dropped by four-fifths following the introduction and subsequently started rising again until being in 2018 approximately at the same level as a few years before the reform.<sup>41</sup>

To mitigate the expected drop in student flows from developing countries, the government assigned the Swedish Institute with initiating scholarship programs directed toward such countries. These programs seem to have had an impact on the number of students coming from poor countries; without them, the drop that did occur would likely have been even bigger.<sup>42</sup>

In March 2017, the Swedish Government established a special inquiry on increased internationalization of higher education institutions (*Utredningen om ökad internationisering av universitet och högskolor*) with three main tasks.

- To suggest new goals as well as a new national strategy for achieving an increased internationalization of Swedish higher education and research activities.

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<sup>40</sup> Delmi (2019), *Internationella studenter i Sverige – Avgiftsreformens påverkan på inflödet av studenter*. 5 April.

<sup>41</sup> UKÄ (2018), *Universitet och högskolor – årsrapport 2018*. 5 April.

<sup>42</sup> Delmi (2019)

- To propose how to increase the number of Swedish students gaining an international perspective in their education during their studies.
- To propose measures to increase the attractiveness of Sweden as a study destination and knowledge nation.

The background was increasing academic competition between countries and higher education institutions with more and more countries establishing themselves as important study and research destinations. The inquiry concluded that Swedish actors must look further afield when developing academic cooperation; an adjustment that the same actors are currently too slow to make. The greatest strength of Sweden, as well as the most important factor in this competition, is the high-quality level of the country's "knowledge system", meaning higher education, research and innovation. The possible gains from this strength are, according to the inquiry, not fully realized, though, as Swedish higher education institutions are not very visible in other countries. This lack could even do damage to the knowledge system in the long run through missed opportunities for cooperation. Two possibly fruitful arenas for increased internationalization were identified: cooperation with the other Nordic countries and cooperation within the EU.

In the national strategy for internationalization laid forward as a result of the inquiry, Sweden having a high level of attractiveness as a study destination and knowledge nation was thus set as one of the main objectives for the coming decade, establishing it as part of a wider strategy to achieve ends such as competitiveness and sustainable development.<sup>43</sup> To achieve this objective a number of measures were proposed, a selection of which are listed below.<sup>44</sup>

- A more developed and larger scholarship system.
- Reformed regulation for tuition fees meaning more predictability and transparency for students and more flexibility for higher education institutions.
- Simplification of the rules and processes around third-country students coming to Sweden to study.
- An increased international presence through the development of dedicated organizations, at home and abroad, for the purpose.
- Creation of a platform for institutional cooperation for internationalization led by five key public agencies and giving these agencies the task of supporting academic internationalization through continuous international monitoring and analysis.
- Giving higher education institutions more responsibility in the process of providing residence permits to international students.

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<sup>43</sup> SOU 2018:3, [En strategisk agenda för internationalisering](#), 5 April.

<sup>44</sup> SOU 2018:78, [Ökad attraktionskraft för kunskapsnationen Sverige](#). 5 April.

- Emphasizing to international students their right to influence their education and situation in the same way as domestic students.

Since the inquiry's reports have been circulated for comments among the many affected actors, for instance, many higher education institutions, which of these proposals that are going to materialize into public policy and reform is generally yet to be seen.