

# Annex: Payment Council's Committee on the Accessibility of Payment Services' survey on the right to a payment account<sup>1</sup>

*This report was originally written in Swedish. While care has been taken in preparing the English translation, it may contain inadvertent inaccuracies.*

## Summary

There is a conflict of interest between the rules on the right to a payment account and anti-money laundering regulations. The conflict arises when, on the one hand, the banks<sup>2</sup> are obliged to offer consumers legally resident in the EU/EEA a payment account with basic features while, on the other hand, the banks are obliged to refuse payment accounts in cases where they do not obtain sufficient customer due diligence to be able to manage the money laundering and/or terrorist financing risks that the customer is deemed to pose. When consumers are refused a payment account or have it cancelled, it is usually because the bank does not achieve sufficient customer due diligence, for example because the identity cannot be established or the customer does not answer the necessary questions. However, the anti-money laundering legislative framework is risk-based and requires banks to do what they can to manage risks on a case-by-case basis, including by taking mitigating measures to address higher risks of money laundering or terrorist financing that may arise, for example, from a lack of customer due diligence. The banks appear to have improved their performance in this area within the existing regulatory framework. However, it can be concluded that with current and future regulations affecting this area, not everyone will be able to access a payment account.

The Committee also sees challenges in terms of payment account information to consumers, reappraisal and review processes, and the ability to make payments without a payment account. Information on the conditions for opening and maintaining a payment account does not always reach the target groups, and few consumers complain or seek legal redress in cases of refusal or cancellation. The review process can also take a long time. As some essential payments are difficult to make without a payment account, the committee believes that this issue needs to be analysed and addressed.

The Committee's summarised conclusions are as follows

- The banks should ensure that they have the technical capabilities, processes and procedures in place to address higher risks of money laundering or terrorist financing, e.g. by restricting functions in payment accounts.
- A review of the need for legislative changes or guidance should not be excluded.
- Information on and around the right to a payment account should be improved. The Retail Payments Council should endeavour to improve the dissemination of information.
- The review process would benefit from being faster.
- Alternative ways of making payments are needed for those who do not have a payment account. Mapping work could be carried out in the context of the work of the Retail Payments Council.

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<sup>1</sup> This report has been prepared by the Payment Council's Committee on the Accessibility of Payment Services for the Retail Payment Council's plenary meeting on December 4 2025. The Committee's participants Digidel, Dalarna County Administrative Board, the Swedish Post and Telecom Authority, Finance Sweden, the Swedish Trade Federation, the Swedish Agency for Economic and Regional Growth and the Riksbank have taken part in the work on the report. Finansinspektionen and the Swedish National Debt Office have taken part as observers. Bankgirot and Swedbank have chosen not to take part. The Payment Council Secretariat coordinated the work on the report.

<sup>2</sup> The term 'banks' is used hereafter to refer to credit institutions and branches of foreign credit institutions.

## Background, purpose and delimitations

The Payments Council has tasked the Committee on the accessibility of payment services with analysing problems regarding access to payment accounts and identifying possible measures to ensure that as many people as possible have access to a payment account. The mapping and the conclusions of the work are summarised in this report.

This report addresses consumers' right to a payment account with basic features. Issues relating to additional services that are not basic functions under the Payment Services Act (2010:751), such as BankID and Swish, may appear in the report but are not dealt with in more detail. Information received by the Committee regarding access to payment accounts by companies and economic associations is presented separately in Appendix 2.

## The data in the report

The report is based on public information in the form of reports, regulations and guidance documents; information collected from committee participants via a survey and at meetings; and information from the Retail Payment Council Secretariat's contacts with authorities and companies.

## Applicable law<sup>3</sup>

### Right to a payment account under the Payment Services Act

There is no obligation for a bank to provide payment accounts with basic features.<sup>4</sup> However, if a bank provides such accounts, it has an obligation under the Payment Services Act to offer the accounts to all legally resident consumers in the EEA, unless it is contrary to the Anti-Money Laundering Act or there are special reasons, such as suspicion of illegal use of the payment account or the consumer's past misbehaviour.<sup>5</sup> Applications must be processed promptly and decided within 10 business days. In the event of a refusal, the consumer must be informed of the reasons for the decision (if possible with regard to national security, public order and also, for instance, rules on professional secrecy under the Act (2017:630) on Measures against Money Laundering and Terrorist Financing). The consumer must also be informed of where to lodge a complaint or request a legal review. An existing payment account may be cancelled in the event of unauthorised use, misrepresentation or for specific reasons. Depending on the reason for the dismissal, it can be made with immediate effect or with at least two months' notice. The consumer should also be informed, where possible, of the reasons for the decision and the possibility of legal review.

### Anti-Money Laundering Act

Banks are obliged to take know-your-customer (KYC) measures when establishing and maintaining business relationships, as well as for certain one-off transactions. This includes identification checks and assessing the purpose and nature of the business relationship. Measures should be risk-based – high risk requires in-depth controls, while simplified measures can be applied at low risk. Deficiencies in one or more KYC measures may be addressed through enhanced continuous monitoring and surveillance of the business relationship (see Government Bill 2016/17:173 p. 254). Banks must also conduct a general risk assessment of how their services could be used for money laundering or terrorist financing, and assess each customer's risk profile.

The right to a payment account with basic features may be limited by KYC requirements. Suspicion of money laundering or terrorist financing alone does not constitute grounds for refusal or cancellation.

<sup>3</sup> For a more detailed description of the legal basis under the Payment Services Act and the Anti-Money Laundering Act, see Appendix 1.

<sup>4</sup> What is meant by basic functions under the Payment Services Act is listed in Appendix 1. For example, BankID or Swish do not constitute such basic functions.

<sup>5</sup> See [Government Bill2016/17:129 p. 66](#) and [Government Bill2022/23:10, p. 8](#).

However, a lack of customer due diligence, even after measures have been taken to achieve it, may prevent a business relationship from being established or maintained. What constitutes special grounds for termination is ultimately assessed on a case-by-case basis, based on the framework of the anti-money laundering regulations.

The requirements of anti-money laundering regulations take precedence over the right to a payment account. Finansinspektionen has also issued regulations on identification checks and other anti-money laundering measures.

## International sanctions

Restrictive measures (sanctions) decided by the UN or the EU that may affect individuals also apply in Sweden. For sanctions to have the desired impact, banks and other financial firms need to take steps to comply with them. This means that the banks are obliged to identify their customers, also in light of international sanctions rules. The prohibitions in the sanctions regulations are categorical and not based on a risk-based approach. The Act on International Sanctions (2025:327) has introduced into Swedish law criminal provisions on violations of such sanctions.

## Current situation

### How many people do not have a payment account?

It is difficult to estimate how many consumers in Sweden do not have a payment account and why, as there is no complete data on denied or cancelled accounts. This makes it difficult to monitor and assess the extent of the problem. Finansinspektionen is now investigating the possibility of issuing regulations for reporting statistics on cases where the bank has rejected a payment account application or cancelled a payment account.

However, analyses show that consumers are denied payment accounts or have them cancelled. Some analyses also highlight groups that most often have problems:

- According to a report by Finansinspektion, the number of denied accounts in the four largest banks increased from around 940 (2023) to around 1,600 (2024), while closed accounts decreased from around 60,850 to 52,400. According to Finansinspektionen, the increase may be due to better data quality. One possible explanation for the decrease in the number of closed payment accounts during the same period is the closing of inactive accounts since Finansinspektionen's previous survey (from 2023). According to the banks, the most common reason for refusing or closing a payment account is lack of customer due diligence.<sup>6</sup>
- In 2024, the Swedish Consumers' Banking and Finance Bureau received a total of around 9,100 cases, of which around 25 per cent concerned payment accounts. The Bureau states that it is often contacted by other agencies or organisations that work with or represent consumer groups that often encounter problems opening accounts (e.g. asylum seekers, labour migrants, foreign students and homeless people). In cases where the representatives represent a large number of consumers, this becomes one single case in the statistics.<sup>7</sup> In its 2023 annual report, the Bureau states that consumers who have previously had their account cancelled and their BankID blocked seem to have difficulties opening a payment account.<sup>8</sup>

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<sup>6</sup><https://www.fi.se/contentassets/4ce68dd7ebe54feaaa2ce02c6abe7361/uppfoljning-bankerna-ratt-till-betalkonto.pdf> (retrieved 17.11.2025, only available in Swedish).

<sup>7</sup>[https://www.konsumenternas.se/globalassets/pdf/vb\\_kbb\\_2024.pdf](https://www.konsumenternas.se/globalassets/pdf/vb_kbb_2024.pdf) (retrieved 17.11.2025, only available in Swedish).

<sup>8</sup><https://www.konsumenternas.se/globalassets/pdf/verksamhetsberattelse-kbb-2023.pdf> (retrieved 18.11.2025, only available in Swedish)

- A survey by the Payments Inquiry shows that several Swedish universities and organisations have had problems with people connected to them being unable to open payment accounts in Swedish banks. Out of 25 respondents, 12 reported such difficulties, of which 11 were higher education institutions. The report also refers to data from 17 higher education institutions showing that more than a third of 3,000 foreign visiting researchers/other staff without a Swedish personal identity number are denied a payment account each year. The Nordic Freedom of Movement Council reports that even border commuters without a social security number or national ID document are often denied an account.<sup>9</sup>
- Several county administrative boards repeatedly report difficulties for foreign researchers and students to open bank accounts in Sweden. A survey by the Swedish Council for Higher Education and Plint shows that 84 per cent of 37 institutions surveyed experience problems for international students in obtaining a payment account. The corresponding figure for internationally recruited staff was 65 per cent.<sup>10</sup> A report from Uppsala University shows that 66 per cent of post-doctoral researchers and 57 per cent of doctoral students find it difficult to open a payment account.<sup>11</sup>
- A Ramboll report from November 2024, commissioned by the Swedish Post and Telecom Authority (PTS), shows that people without a Swedish ID document (e.g. asylum seekers and guest workers) experience difficulties opening payment accounts more often than others. The most common reasons are lack of customer due diligence.<sup>12</sup>

To summarise, the analyses indicate that it is often people without a Swedish personal identity number who have problems opening a payment account, and that the reason in most cases is that the banks do not consider that they have sufficient customer due diligence. However, the Committee wishes to emphasise that the summary is not exhaustive. In the Committee's view, consumers who have or may have problems accessing payment accounts are very heterogeneous as a group. The Committee would also like to highlight that people with disabilities who are given access to payment accounts with basic functionalities can often find it difficult to use the services.

## Guidelines and advice for achieving customer due diligence

According to the European Banking Authority's (EBA) guidelines<sup>13</sup> and statements by Finansinspektionen, banks should implement risk mitigation measures to address higher risks of money laundering or terrorist financing that may arise, for example, due to a lack of customer due diligence.

Certain checks and data are mandatory for banks to carry out and collect. According to the Swedish Institute against Money Laundering (SIMPT) basic guidance on customer due diligence, these are checks against sanction regulations, which require identification, as well as certain checks that follow on from money laundering regulations, namely

- details of the customer's identity
- information on whether the customer is a politically exposed person (PEP), or a family member or known associate of a PEP,

<sup>9</sup> The state and the payments, SOU 2023:16, Chapter 6.

<sup>10</sup> <https://www.uhr.se/internationella-mojligheter/Plattform-for-internationalisering/aktuellt-fran-plint/vanligt-att-internationella-studenter-nekas-svenskt-bankonto/> (retrieved 27.11.2025, only available in Swedish)

<sup>11</sup> Publ. 2024, <https://uudoctoralboard.se/docs/dn-migration-survey-report-2023/> (retrieved 27.11.2025)

<sup>12</sup> <https://pts.se/contentassets/eeb59f90a9a643e8a8bab9a7fbaf1489/rapport---behovet-av-grundlaggande-betaltjanster-2024-11-22-002.pdf> (retrieved 17.11.2025, only in Swedish).

<sup>13</sup> Guidelines and recommendations from the EBA are equivalent to Swedish general guidelines.

- information on whether the customer is established in a high-risk third country, and
- information on the purpose and nature of the business relationship.<sup>14</sup>

## Establishing the identity of the customer

The banks may not require a person to have a Swedish personal identity number or Swedish identity document to open a payment account. As a general rule, the bank must check the person's identity against a passport or other identity document which must contain a photograph of the person, an indication of citizenship and be issued by a public authority or other authorised issuer (traditional identity document). Even if an individual does not have an identity document, the bank has the possibility to verify the identity through other reliable documents or according to risk-based procedures.<sup>15</sup> It should be noted that the EU Anti-Money Laundering Regulation (AMLR)<sup>16</sup> will start to apply on 10 July 2027 (see the section "Future regulatory framework on risk mitigation measures"). The customer due diligence requirements in the AMLR will be supplemented with regulatory technical standards proposed by the EBA and subject to public consultation. In its consultation response to the EBA, Finance Sweden has pointed out that the new rules in some cases lead to financial exclusion, for example for people without ID documents. This has also been raised with Finansinspektionen at the consultation meeting. In its final version of the proposal, which the EBA submitted to the AMLA on 30 October 2025, the EBA has taken into account a number of the comments provided by the industry.

The SIMPT customer due diligence guide describes some of the EBA's guidelines on how a bank can identify people without traditional identity documents. Guideline 19 (a-c) states that identification can be based on reliable documents with name and date of birth, e.g. if issued by social services or other authorities. The EBA also mentions invalid ID documents and certificates from authorities offering support to the consumer. SIMPT concludes that there should be some form of document and a reliability in the check that the bank can make. When the person has a document, the bank should assess the evidence available to determine whether it is sufficient to make a sufficiently reliable check that the person is who they say they are.<sup>17</sup>

During the work on this report, Finance Sweden has expressed to the Retail Payment Council's Secretariat that the lack of identification documents is complicated for banks to deal with. According to the association, it has been seeking guidance from Finansinspektionen since 2009 on how consumers can prove their identity without identity documents.

## Understand the purpose and nature of the business relationship

Another key element of the KYC process is that the bank needs to understand the purpose and nature of the business relationship, i.e. why the customer wants to enter into a business relationship with the bank and why a particular service or product has been chosen, as well as how the service or product will be used. The purpose is to be able to assess the customer's risk profile and understand how the account will be used, in order to detect anomalies.

According to the Government bill "Additional measures against money laundering and terrorist financing", the scope of information gathering and assessments should be proportionate to the product and service provided and the customer's risk profile. For products and services that have a well-defined and limited area of use, the initial assessment can in many cases be contingent on assumptions based on how customers normally use products or services.<sup>18</sup>

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<sup>14</sup> Purpose is about why the customer has chosen to enter into a business relationship with the operator/why a particular service or product has been chosen; nature is about how the customer intends the service or product to be used.

<sup>15</sup> See Chapter 3, section 2 of Finansinspektionen's regulations (FFFS 2017:11) on measures against money laundering and terrorist financing and the Swedish Anti-Money Laundering Institute, Guidance on customer due diligence for banks, fifth edition (<https://www.simpt.se/media/z5xfrz3a/bank-kundkaennedom-5-uppl.pdf> (retrieved 17.11.2025)).

<sup>16</sup> Regulation (EU) 2024/1624 of the European Parliament and of the Council of 31 May 2024 on the prevention of the use of the financial system for the purpose of money laundering or terrorist financing.

<sup>17</sup> <https://www.simpt.se/media/z5xfrz3a/bank-kundkaennedom-5-uppl.pdf> (retrieved 17.11.2025), pp. 19-20.

<sup>18</sup> Government Bill 2016/17:173 p. 527.

According to the SIMPT guidance, the purpose and nature of the business relationship should be described in detail. Too general and comprehensive a description and documentation may lead to the bank not fully understanding the risks associated with the customer. This also entails a risk that the bank does not properly follow up on an ongoing basis and thus cannot adequately monitor the customer's transactions.<sup>19</sup>

### **Possibility to take risk mitigation measures**

The EBA Guidelines require banks to have risk-based customer due diligence procedures in place to ensure that they do not unduly exclude customers from financial services. Before refusing a customer due to money laundering or terrorist financing risks, alternative measures should be considered, such as customised monitoring or a limited range of services.<sup>20</sup>

Restricting the range of services available to consumers may mean that certain basic functions under the Payment Services Act are not offered. At the same time, in a legal opinion on asylum seekers' access to financial services, Finansinspektionen emphasises that the purpose of the law is to promote financial inclusion, and that it may therefore be acceptable to offer a limited range of services, and that this is in line with the risk-based approach of the anti-money laundering regulations.<sup>21</sup>

In a report published in 2023, Finansinspektionen states that if there is an elevated general risk of money laundering or terrorist financing, banks should consider alternative risk mitigation measures, such as offering a payment account with tighter monitoring of the customer's transactions, introducing customised limits or offering accounts with a more limited range of services. Finansinspektionen is of the opinion that such a review should be conducted for each payment account application that the bank rejects or each payment account that it considers closing.<sup>22</sup> In addition, the Anti-Money Laundering Act (Chapter 3, Section 15) allows banks to apply simplified customer due diligence measures if the risk is deemed to be low.

In Finansinspektionen's most recent follow-up of the four major banks' work on the right to a payment account, Finansinspektionen makes the assessment that the banks have taken measures to develop the possibilities to take risk-mitigating measures, including improving their technical possibilities to customise the services and products to which a particular customer has access. Furthermore, Finansinspektionen has stated that a legal requirement should be introduced for banks to assess whether they can manage the risk of money laundering and terrorist financing by taking other measures before a consumer is denied a payment account or has it closed. Finansinspektionen also believes that banks should be required to document decisions to take such measures so that it is possible to follow up their processing.<sup>23</sup>

During the work on this report, Finance Sweden has stated to the Retail Payment Council's secretariat that Finansinspektionen should issue guidance on the areas in which it thinks the banks should make changes, for example questions about how and to what extent functions on a payment account can be restricted. Finance Sweden wants such guidance to be developed through a consultation process, preferably in dialogue with the Association and its members.

### **Upcoming regulations on risk mitigation measures**

On 10 July 2027, the EU Anti-Money Laundering Regulation (AMLR) and its accompanying guidelines will begin to apply. According to Finance Sweden, this means that banks will have to update customer due diligence with regard to all existing customers. One question is how to deal with existing customers

<sup>19</sup> Swedish Anti-Money Laundering Institute, Basic guidance on customer due diligence, seventh edition (<https://www.simpt.se/media/skfpby4/grundlaeggande-vaegledning-kundkaennedom-7-uppl.pdf>) (retrieved 17.11.2025).

<sup>20</sup> Guidelines on controls and guidelines for the effective management of money laundering and terrorist financing risks in the provision of financial services, EBA/GL/2023/04, p. 5.

<sup>21</sup><https://www.fi.se/contentassets/323025d4553b41378cddb5ff9ea0cee7/stallningstagande-20221.pdf> (retrieved 17.11.2025).

<sup>22</sup>[https://www.fi.se/contentassets/52f041f27a434104a90d309983c6e8d1/rapport\\_betalkonto.pdf](https://www.fi.se/contentassets/52f041f27a434104a90d309983c6e8d1/rapport_betalkonto.pdf) (retrieved 17.11.2025).

<sup>23</sup> Most recently in a 2025 report, see <https://www.fi.se/contentassets/4ce68dd7ebe54feaaa2ce02c6abe7361/uppfoljning-bankerna-ratt-till-betalkonto.pdf> (retrieved 17.11.2025).

who do not provide requested information. According to the Banking Association, the threshold for obtaining a bank account may become higher due to increased customer due diligence requirements.

### **Design of processes and procedures**

Each bank designs its processes to achieve customer due diligence. According to Finansinspektionen's 2025 report, some banks have chosen to centralise the process in order to pool expertise and ensure the most equivalent and accurate assessments possible in each case. Other banks have chosen to allow local offices to make decisions to a greater extent, with the support of central functions.<sup>24</sup>

Although the banks control the process design, generalised procedures can be designed. One example is the so-called LMA card routine developed by Finance Sweden together with the Swedish Migration Agency.<sup>25</sup> The LMA card routine is an agreement that allows banks to verify certain information about the customer with the Swedish Migration Agency and provides guidance on how asylum seekers can identify themselves with a copy of their ID document certified by the Swedish Migration Agency. The person proves his/her status as an asylum seeker with the Migration Agency's LMA card (proof that the person is an asylum seeker). However, the procedure is not a recommendation from Finance Sweden and is not binding on the banks. It is therefore up to each bank to decide whether or not to follow the procedure. According to the Ramboll report commissioned by PTS, several organisations believe that the LMA card procedure is applied differently by different banks and that there may also be differences between branches within the same bank.<sup>26</sup> Finansinspektionen has not published any approval of the LMA card scheme or otherwise endorsed it. According to Finance Sweden, there is reason to assume that the LMA card procedure would be complied with to a greater extent if this were done. Furthermore, it is unclear whether the LMA card routine will be able to remain in place when the AMLR is implemented.

### **Supervision by Finansinspektionen**

The 2023 Payments Inquiry highlights that banks perceive an emphasis on the supervision of compliance with anti-money laundering regulations compared to the supervision of compliance with rules implementing the Payment Accounts Directive, which appears to have led banks to perceive greater risks of breaching the former. According to the report, there are indicators of an increased reluctance to accept certain customers who can be expected to be both unprofitable and pose a higher money laundering risk. Since the provisions on the right to a payment account with basic features entered into force in 2017, Finansinspektionen has not conducted any investigations that could lead to sanctions based on chapter 4a of the Payment Services Act. This may increase banks' propensity to engage in unintended risk mitigation, according to the report.<sup>27</sup> Since the report was published, Finansinspektionen has conducted two surveys of banks' work on the right to a payment account. In its latest survey of the four major banks' work on the right to a payment account, Finansinspektionen pointed out that the banks' work has improved since 2023.<sup>28</sup>

### **A general low-risk account**

A generic low-risk account would be a specialised account product with limited features – a kind of simpler payment account – that could be offered to consumers with a higher risk profile. Defining and regulating the offering of this type of product in law was discussed by the Payment Inquiry, for instance. The Inquiry concluded that such an account would undermine the purpose of the Payment

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<sup>24</sup> <https://www.fi.se/contentassets/4ce68dd7ebe54feaaa2ce02c6abe7361/uppfoljning-bankerna-ratt-till-betalkonto.pdf> (retrieved 17.11.2025, only available in Swedish).

<sup>25</sup> <https://www.financesweden.se/for-bankkunder/att-bli-bankkund/lma-kortsrutinen/> (retrieved 17.11.2025).

<sup>26</sup> <https://pts.se/contentassets/eeb59f90a9a643e8a8bab9a7fbaf1489/rapport---behovet-av-grundlaggande-betaltjanster-2024-11-22-002.pdf>, p. 12 (retrieved 17.11.2025).

<sup>27</sup> The state and the payments , SOU 2023:16, report p. 277 ff

<sup>28</sup> <https://www.fi.se/contentassets/4ce68dd7ebe54feaaa2ce02c6abe7361/uppfoljning-bankerna-ratt-till-betalkonto.pdf> (retrieved 18.11.2025).

Accounts Directive, i.e. that all consumers legally resident in the EEA are entitled to a certain minimum level of services. The Inquiry also argues that there may be EU legal challenges with such an account.

Furthermore, the Inquiry notes that there are difficulties in regulating in detail how a certain type of account should be designed so that simplified customer due diligence measures can always be sufficient for such a product. This is partly because the starting point in the anti-money laundering regulations is that credit institutions must make an assessment based on the customer relationship in each individual case, i.e. work according to a risk-based approach. Finally, the report notes that forthcoming EU regulation will, among other things, fully harmonise customer due diligence requirements within the EU in the AMLR, which may make national deviations more difficult.<sup>29</sup>

## Information before applying for an account

During discussions in the Committee, Finance Sweden has stated that consumers, including newly arrived immigrants, guest workers or international students, who want to open a payment account with a Swedish bank are often unaware of the conditions for this, such as the type of identity document required or the questions the bank needs answers to. This can lead to people being denied access to a payment account for reasons that could have been avoided if they had had the right information when applying. It is also important that consumers are aware of their right to a payment account with basic features.

There are various channels with information on opening a payment account. For instance, Finance Sweden has gathered information on what is required to become a bank customer in a number of brochures and fact sheets aimed at different target groups in different languages.<sup>30</sup> The Consumers' Banking and Finance Bureau has also gathered information.<sup>31</sup> The website "Information Sverige", a portal for new arrivals administered by the Västra Götaland County Administrative Board, also contains information on opening a payment account in Sweden. Universities also have some information on their websites.<sup>32</sup>

The amount of information conveyed in the different channels varies. For example, the Information Sverige website does not mention that legal residents of the EU/EEA are entitled to a payment account with basic functions. Of the examples above, only the Consumers' Banking and Finance Bureau has information on where to complain if the bank has refused or cancelled a payment account, or that you have the right to receive the information in writing from the bank.

## Possibility to complain

If a consumer is refused a payment account or has it cancelled, there are ways to complain both inside and outside the bank.

- Each bank must have a complaints officer, sometimes called a customer ombudsman, who can review a decision taken by the bank. The complaints officer should, as a general rule, reply to a complaint within 14 days. If it takes longer, for example when a longer investigation time is needed, the customer should be notified.<sup>33</sup>
- Consumers have the possibility to complain to the National Board for Consumer Disputes (ARN). The processing time, according to the Board, is normally about six months.<sup>34</sup>

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<sup>29</sup> The state and the payments , SOU 2023, Chapter 6.5.2.

<sup>30</sup> "Becoming a bank customer", available in 22 languages; "A guide for foreign embassy staff - Becoming a bank customer in Sweden".

<sup>31</sup> <https://www.konsumenternas.se/konsumentstod/lag-ratt/vad-sager-lagen/ratt-till-betalkonto-med-grundlaggande-funktioner/> (retrieved 17.11.2025)

<sup>32</sup> <https://www.kth.se/en/om/jobba-pa-kth/arbeta-och-utvecklas/relocation/banking-and-financial-matters-1.937962>, <https://www.su.se/english/education/new-in-sweden/banking> (retrieved 17.11.2025)

<sup>33</sup> [Complaint in a banking case | Konsumenternas](#) (retrieved 17.11.2025).

<sup>34</sup> [Consumer | National Board for Consumer Disputes](#) (retrieved 17.11.2025).

- Finally, there is also the possibility of going to court to sue the bank.

According to Finansinspektionen, only a few per cent of consumers who have had an account application rejected or an existing account cancelled requested a review during the period 2020-2022. In the case of a review, the banks changed their decisions on average in around 20 per cent of the cases. However, the statistics are incomplete and figures are missing from some banks. Finansinspektionen makes the assessment that the reason why the proportion of decisions that are changed is so large may be that the banks have not fully succeeded in introducing the procedures throughout the organisation. Finansinspektionen also believes that the large proportion of amended decisions can be partly explained by customers who have provided incomplete information to the bank at an earlier stage completing their answers at the time of reassessment.<sup>35</sup>

Finansinspektionen also writes that the complaints received by the Swedish Consumers' Banking and Finance Bureau show that many consumers have problems getting decisions from the bank that can be reconsidered. Consumers are often asked to complete their applications, which in some cases means that a case is not considered to be formally established. In cases where the bank closes the case without receiving the requested information, the customer does not always receive a formal reply or rejection, and therefore does not receive information on where to lodge a complaint.<sup>36</sup>

According to information from ARN provided to the Retail Payment Council's secretariat, 220-250 payment account complaints were received annually in the years 2022-2024. However, the statistics are uncertain as other types of banking-related cases may also be included. The processing time at ARN is normally around six months.<sup>37</sup>

The Committee's understanding, after searching the legal database, is that few consumers take cases of denied or cancelled payment accounts to court.<sup>38</sup>

## Lack of possibilities to pay without a payment account

There are three main ways to receive payments or reimbursements without a payment account and to pay in your own name, i.e. without using someone else's payment account: cash, payment slips and rechargeable cards.

*Cash* can be used in most grocery stores, pharmacies, petrol stations, but can only be used to a limited extent in e.g. consumer durables and hospitality. The possibility of paying bills with cash is available in a total of 25 established offices in the country and is managed by the company ChangeGroup. In addition, the company Svensk Betaltjänst has seven agents with a similar range of services. The sites are unevenly distributed across the country, with a strong concentration in the area between Stockholm and Gothenburg. People in the south-eastern, central and northernmost parts of the country do not have this possibility. For example, for a person living in Kiruna, it is 60 kilometres to the nearest place to pay a bill in cash.<sup>39</sup> From a national perspective, the ability to pay bills with cash on one's own is therefore inadequate. The county administrative boards have been raising the alarm about this in their annual monitoring report since 2022.<sup>40</sup> The County Administrative Board of Dalarna County reports in the 2025 monitoring report that 10 out of 21 counties across the country do not have a market participant offering payment of bills in cash, in addition to the local savings banks that accept bill payment by their own customers.

<sup>35</sup> [https://www.fi.se/contentassets/52f041f27a434104a90d309983c6e8d1/rapport\\_betalkonto.pdf](https://www.fi.se/contentassets/52f041f27a434104a90d309983c6e8d1/rapport_betalkonto.pdf) (retrieved 17.11.2025).

<sup>36</sup> [https://www.fi.se/contentassets/52f041f27a434104a90d309983c6e8d1/rapport\\_betalkonto.pdf](https://www.fi.se/contentassets/52f041f27a434104a90d309983c6e8d1/rapport_betalkonto.pdf) (retrieved 17.11.2025).

<sup>37</sup> <https://www.arn.se/konsument/> (retrieved 17.11.2025).

<sup>38</sup> According to search in JUNO [Search results for the right to a payment account | Norstedts Juridik](#) (retrieved 17.11.2025).

<sup>39</sup> Swedish Agency for Economic and Regional Growth Pipos Serviceanalys (retrieved 28.10.2025).

<sup>40</sup> See e.g. the 2024 monitoring report:

<https://www.lansstyrelsen.se/download/18.5718be071936a332693c6a0/1732890246440/Bevakning%20grundl%C3%A4ggande%20betalt%C3%A4nster%202024.pdf> (retrieved 17.11.2025).

*Payment slips*, also known as check value coupons, are sometimes used to pay benefits to people who do not have an account, e.g. by public authorities. The coupons can be redeemed as payment or for cash in many shops, usually for a fee. The ability to redeem slips for cash is often, according to ClearOn, limited to SEK 2,000 and to the extent that cash is available at the store's checkout.<sup>41</sup> Often, payment vouchers from government agencies exceed this amount.<sup>42</sup> For people receiving larger benefits, it is therefore not a viable option.

*Rechargeable cards* (pre- or postpaid) are an alternative to cash and payment slips. The Swedish National Debt Office has framework agreements with Paygoo and Swedbank, which public actors can call on to pay out reimbursements via the cards.<sup>43</sup> The cards are linked to card networks and can therefore function to a large extent as ordinary debit cards, e.g. for withdrawing cash from an ATM or paying in shops. There are often limits on the amount of money that can be withdrawn or used for purchases. The possibility to pay bills by card is limited to branches and agents offering the service. Currently, the same companies offer bill payments with cash, i.e. ChangeGroup and Svensk Betaltjänst.

To summarise, the possibilities to receive and make payments in one's own name without a payment account are very limited and concentrated in certain geographical areas. The Committee recognises that it is common to use other people to manage payments, which is often seen as the only way out when other solutions are not available. However, this is uncertain and in some cases involves breaking the rules.

## International survey

### Denmark

The Danish Financial Supervisory Authority (Finanstilsynet) has described in a meeting with the Retail Payment Council's Secretariat and Finansinspektionen that Finanstilsynet pointed out problems with access to payment accounts about five years ago. Finanstilsynet found that Danish banks were denying consumers payment accounts at an excessive rate and on the wrong grounds. Since then, Finanstilsynet has implemented a series of information and enforcement measures that it believes have been effective:

- 2021: published guidance together with the Danish Competition and Consumer Authority on how banks should balance payment account rights with anti-money laundering rules.<sup>44</sup>
- 2022-2023: repeatedly sent letters to the banks to emphasise consumer rights, including time limits, grounds for refusal and requirements for written decisions.<sup>45</sup>
- 2024: reported continued deficiencies in banks' handling and issued injunctions to five banks for non-compliance with the rules on justification of refusals, valid grounds for refusal and compliance with the processing time
- 2025: published a Q&A on the access to payment accounts for homeless and socially vulnerable people, including guidance on how banks can identify people with non-traditional identity documents.<sup>46</sup>

<sup>41</sup> <https://www.clearon.se/vara-tjanster/vardeavvier/> (retrieved 18.11.2025).

<sup>42</sup> The state and the payments , SOU 2023:16, Chapter 19

<sup>43</sup> <https://www.riksgalden.se/sv/var-verksamhet/statens-internbank/ramavtal/forbetalda-korttjanster/> (retrieved 17.11.2025).

<sup>44</sup> [https://www.finanstilsynet.dk/nyheder-og-presse/nyheder-og-pressemeddelelser/2021/feb/ny\\_vejledning\\_om\\_betalingslovens\\_63\\_hvidvaskloven](https://www.finanstilsynet.dk/nyheder-og-presse/nyheder-og-pressemeddelelser/2021/feb/ny_vejledning_om_betalingslovens_63_hvidvaskloven) (retrieved 17.11.2025).

<sup>45</sup> [https://www.finanstilsynet.dk/nyheder-og-presse/nyheder-og-pressemeddelelser/2023/mar/al\\_betalinskonto\\_140323](https://www.finanstilsynet.dk/nyheder-og-presse/nyheder-og-pressemeddelelser/2023/mar/al_betalinskonto_140323);  
[https://www.finanstilsynet.dk/nyheder-og-presse/nyheder-og-pressemeddelelser/2023/mar/al\\_betalinskonto\\_140323](https://www.finanstilsynet.dk/nyheder-og-presse/nyheder-og-pressemeddelelser/2023/mar/al_betalinskonto_140323),  
[https://www.finanstilsynet.dk/nyheder-og-presse/nyheder-og-pressemeddelelser/2023/aug/basal-betalingskonto\\_070823](https://www.finanstilsynet.dk/nyheder-og-presse/nyheder-og-pressemeddelelser/2023/aug/basal-betalingskonto_070823) (retrieved 17.11.2025).

<sup>46</sup> <https://www.finanstilsynet.dk/finansielle-temaer/forbruger-og-investorinformation/spoergsmaal-og-svar/hjemloeses-og-andre-udsatte-borgeres-adgang-til-en-basal-betalingskonto> (retrieved 17.11.2025).

In addition to these measures, according to the Danish Financial Supervisory Authority, Danish interest groups and politicians have been active on issues related to the right to a payment account.

## Netherlands

In the Netherlands, a covenant between private and public organisations has been in place since 2001 to give as many consumers as possible easy access to digital payments. The covenant allows people who do not receive a payment account with basic functionalities under the Payment Accounts Directive to open and use a payment account. There is basically no functional difference between the accounts. However, a consumer who applies for an account under the covenant must do so together with a social service institution authorised under the covenant. The consumer must have a permanent place of residence or stay in the Netherlands, or a postal address at a social services institution. In some cases, for example if the consumer has been convicted of a financial offence, the bank may require the social services institution to co-sign the application form. The bank may also make it compulsory for the payment account to be administered by the social services institution, for example if the person has previously been suspected of fraud or money laundering.<sup>47</sup> However, the ultimate responsibility always lies with the account holder.

## Current initiatives

### Finansinspektionen (FI)

FI will conduct a more comprehensive survey of the banks' work on the right to a payment account, including smaller banks. FI is also working to eventually be able to collect data through reporting regulations, including on the number of denied and cancelled payment accounts.

### Finance Sweden

Finance Sweden is running a project in collaboration with its members to improve information and the banks' procedures for increased accessibility to banking services, with the aim of facilitating for consumers. More information on the project will be provided at the plenary meeting of the Retail Payments Council on 4 December 2025.

## Discussion and conclusions

### The root problem: friction due to different regulatory objectives

The challenge with the issue of access to payment accounts is that the banks find it difficult to achieve customer due diligence in some cases. Anti-money laundering regulations require the banks to manage the risk of money laundering and/or terrorist financing individually and to take risk mitigation measures. However, the Committee does not have insight into how the banks work with the right to a payment account and therefore cannot assess the banks' handling and processes. Analyses nevertheless show that there are challenges and that access to payment accounts can probably be improved.

A general finding is that the banks need to ensure that they have the processes and technical capacity to take various risk mitigation measures before denying or cancelling a payment account. They should also ensure that staff involved in the design, execution and review of payment account access processes are trained in the relevant regulatory framework and fulfil their obligations at all stages.

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<sup>47</sup> See e.g. <https://www.betaalvereniging.nl/wp-content/uploads/Convenant-primaire-betaaldiensten.pdf> (retrieved 2025-11-18), also described in the State and the Payments, SOU 2023:16, chap. 6.4.4.

A further question is whether there is a need for legislative changes, guidelines or other measures to improve access to payment accounts. Here it can be seen that there are different views on what would be most effective. Some of the participants, including Finansinspektionen, believe that clarification is needed in the law and Finance Sweden wants to see guidelines from Finansinspektionen. The Committee considers that any legislative changes would require in-depth analysis and need to take account of forthcoming regulatory changes in the EU (including AMLR). However, clarification in law should not be ruled out, according to the Committee. The limited international review conducted in the context of this report shows that the Danish FSA's supervisory and guidance efforts have been effective, but it is not clear whether similar efforts would have had the same effect in a Swedish context. However, it is reasonable to assume that guidelines would lead to an improvement, based on the experience with the introduction of guidelines in Denmark.

The Committee does not consider the covenant in the Netherlands to be suitable for replication in Sweden in its entirety. However, there may be situations where a consumer would be helped by civil society organisations or public bodies assisting with the application for an account and/or helping the consumer to prove their identity. This is also mentioned as an option in EBA Guideline 19b<sup>48</sup> and described as an option in Finanstilsynet's Q&A on identification.<sup>49</sup> However, the conditions for such a procedure would need to be further analysed.

### Information on rights and obligations should be improved

The Committee's view is that consumers, including newly arrived immigrants, guest workers or students, are often not informed about the requirements for opening a payment account, such as how they need to be able to identify themselves and what questions the bank needs to ask. It may also be the case that consumers are not informed of their rights under the Payment Services Act, such as the right to receive a written decision from the bank and the possibility to appeal a decision.

The Committee believes that dissemination of information is important and should be improved, including to new arrivals in Sweden. Information to target groups should include what rights they have under the Payment Services Act, what the bank needs to obtain customer due diligence, and how to get their decision reversed or reviewed. Retail Payments Council participants should endeavour to ensure that complete and accurate information is disseminated through the channels available to reach the target audiences.

### The review process would benefit from being faster

The processing times at ARN, which are around 6 months, are considered by the Committee to be challenging for both the consumer and the bank. For the consumer, 6 months is a long time to be without a payment account. During this period, which may be longer, there are few opportunities to make the necessary payments. If the person in question is in Sweden for a limited period, for example for studies or as guest worker, it may cover all or most of the period of stay.

Furthermore, ARN's judgements may be based on evidence submitted by the individual when the case was first opened with the bank. At a later stage, it may be difficult for the bank to achieve customer due diligence under the money laundering regulations if the information submitted is too old. The bank may therefore need to request new updated documents, in addition to those assessed by ARN. Even if the banks comply with ARN's decision, the risk assessment in the re-examination must be based on the updated documentation. This may lead to the bank having to make decisions that ultimately differ

<sup>48</sup> [https://www.eba.europa.eu/sites/default/files/document\\_library/Publications/Guidelines/2023/EBA-GL-2023-04/Translations/1061466/GLs%20on%20MLTF%20risk%20management%20\(EBA%20GL%202023%2004\)\\_SV\\_COR.pdf](https://www.eba.europa.eu/sites/default/files/document_library/Publications/Guidelines/2023/EBA-GL-2023-04/Translations/1061466/GLs%20on%20MLTF%20risk%20management%20(EBA%20GL%202023%2004)_SV_COR.pdf), p. 7 (retrieved 18.11.2025).

<sup>49</sup> <https://www.finanstilsynet.dk/finansielle-temaer/forbruger-og-investorinformation/spoergsmaal-og-svar/hjemloeses-og-andre-udsatte-borgeres-adgang-til-en-basal-betalingskonto> (retrieved 18.11.2025).

from the ARN's decision because the situation has changed during the ARN's processing time. In light of this, the review process will not be fully satisfactory.

A faster appeal process would benefit both consumers and the banks in general. In particular, greater predictability would be achieved if the appeal process were to match the two-month notification period for the cancellation of a payment account under Chapter 4a, section 9, third paragraph of the Payment Services Act. A faster appeal process when an application for a payment account is rejected would also make it easier for people whose stay in Sweden is naturally limited, such as visiting researchers. More appeals would also improve the banks' practices. The Committee has not analysed what would be required to speed up the appeal process.

## Payment options are needed for people without a payment account

The Committee assumes that, in the foreseeable future, there will be people to whom the banks will have to refuse an account under the money laundering regulations, and therefore considers that there should be better opportunities for people without a payment account to make necessary payments. In the Committee's view, the opportunities should be predictable and similar across the country. The committee did not analyse how such alternative systems would be designed. The Committee considers that a first step would be to analyse the current possibilities for payments without a payment account and solutions in other countries. This could be done in the context of the work of the Retail Payments Council.

## Appendix 1 – Applicable law

### Right to a payment account under the Payment Services Act

According to the Payment Services Act (2010:751), Chapter 4a, section 1, first paragraph, credit institutions and branches of foreign credit institutions<sup>50</sup> may not refuse consumers who are legally resident in the EEA to open a payment account with such basic functions as set out in Chapter 4a, section 2 that the bank provides to other consumers.

According to Chapter 4a, section 2 of the Payment Services Act, basic functions refer to the following

1. services required to open, hold and close a payment account,
2. services enabling the deposit of cash into a payment account,
3. services enabling the withdrawal of cash from a payment account over the counter or at ATMs within the EEA; and
4. the execution of the following payment transactions within the EEA:
  - a) direct debits
  - b) payments through a debit card, including online payments; and
  - c) payments, including standing orders, at terminals, over the counter and via online services.

For example, BankID or Swish do not constitute basic functions under the Payment Services Act.

The provision in Chapter 4, section 1 of the Payment Services Act partially implements Articles 1 and 15-17 of the Payment Accounts Directive<sup>51</sup>. However, the so-called contracting obligation under the Act is not absolute, which means that there are exceptions to the obligation to provide a payment account. The second paragraph of the provision provides for an exception that allows banks to refuse to open such a payment account for a consumer if it would be in breach of the Act (2017:630) on Measures against Money Laundering and Terrorist Financing (the Anti-Money Laundering Act), or if

<sup>50</sup> The term 'banks' is used hereafter to refer to credit institutions and branches of foreign credit institutions.

<sup>51</sup> Directive 2014/92/EU of the European Parliament and of the Council of 23 July 2014 on the comparability of fees related to payment accounts, payment account switching and access to payment accounts with basic features.

there are otherwise specific reasons against providing the consumer with a payment account. Examples of special reasons against a provision are if the consumer has used or is likely to use a payment account for illegal purposes or if the consumer has previously misbehaved towards the credit institution.<sup>52</sup>

Applications for payment accounts with basic functions shall be processed promptly, and the matter shall be decided as soon as possible and at the latest within ten banking days of a complete application (Chapter 4a, section 3, first paragraph). If an application for a payment account is rejected, the consumer must be immediately informed of the decision and given information on where to lodge a complaint or request a legal review (Chapter 4a, section 3, second paragraph). Where possible, the notification shall state the reasons for the refusal, unless those reasons would be prejudicial to national security, public policy or contrary to the rules on anti-money laundering and countering the financing of terrorism<sup>53 54</sup>.

The conditions for cancelling an existing contract for a payment account with basic functions are also set out in Chapter 4a. Section 9, first paragraph. Cancellation may occur, for instance, if the consumer has deliberately used the payment account for illegal purposes, if incorrect information was provided when the payment account was opened and correct information would have led to the judgement that the account should not have been opened, or if there are other special reasons (see points 1, 3 and 4). In these cases, the bank must also inform the consumer where complaints and requests for legal review of the cancellation can be made and, if possible, the reasons for the cancellation must be stated (Chapter 4a, Section 9, second paragraph). In the event of cancellation for special reasons, the bank must inform the consumer at least two months before the cancellation takes effect. Cancellation on the basis of paragraph 1 or 3 may take place with immediate effect (Chapter 4a, Section 9, third paragraph).

## Anti-Money Laundering Act

Chapter 3 of the Act (2017:630) on Measures against Money Laundering and Terrorist Financing (the Money Laundering Act) contains provisions that require the banks to carry out customer due diligence measures prior to establishing or maintaining a business relationship or when executing certain individual transactions. Identification checks and gathering information about the purpose and nature of the business relationship must be carried out (Chapter 3, Sections 7 and 12 of the Anti-Money Laundering Act). This means that the banks must take measures to achieve sufficient customer due diligence, so that the risk of money laundering and terrorist financing in each customer relationship can be managed at an acceptable level. The risk-based approach also assumes that deficiencies in one or more KYC measures can be addressed by strengthening the ongoing follow-up and monitoring of the business relationship (see Government Bill 2016/17:173 p. 254). In the event of a high risk of money laundering or terrorist financing that may be associated with the customer relationship, particularly extensive controls must be carried out (Chapter 3, Section 16 of the Anti-Money Laundering Act). Banks, on the other hand, may apply simplified customer due diligence measures if the risk associated with the customer relationship is assessed as low. In such cases, simplified customer due diligence measures, including checks, assessments and investigations, may be of a more limited scope and be carried out in another way (Chapter 3, Section 15 of the Anti-Money Laundering Act).

A general risk assessment shall also be made with regard to how the banks' products and services can be used for money laundering or terrorist financing and the size of the risk of this happening. The scope of the general risk assessment shall be adapted to, among other things, the risks of money laundering that can be assumed to exist (Chapter 2, sections 1-2 of the Anti-Money Laundering Act). The risk

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<sup>52</sup> See [Government Bill 2016/17:129 p. 66](#) and [Government Bill 2022/23:10, p. 8](#).

<sup>53</sup> See Chapter 4, Section 9 of the Anti-Money Laundering Act on professional secrecy. The provision states that an operator or a person working for the operator may not improperly disclose, § to a customer or any third party, that an assessment under Chapter 4, section 2 is being carried out, has been carried out or will be carried out or that information has been provided under Chapter 4, sections 3 or 6.

<sup>54</sup> See [Government Bill 2016/17:129 p. 32](#).

associated with the customer relationship (the customer's risk profile) must also be assessed (Chapter 2, section 3 of the Anti-Money Laundering Act).

A payment account contract with basic features may be cancelled only in exceptional cases for special reasons. The mere fact that there is *suspicion* of money laundering or terrorist financing should not in itself be a ground for cancelling a payment account with basic features. Ultimately, however, it is the anti-money laundering regulations that set the framework for the measures a bank must take with regard to the provisions on the obligation to provide payment accounts, as well as the cancellation of payment account agreements pursuant to Chapter 4a, section 9 of the Payment Services Act. It is precisely when there is a lack of customer due diligence that a bank is not allowed to establish or maintain a business relationship, and this after measures have been taken to achieve adequate customer due diligence. The question of what constitutes special reasons in a particular case is ultimately a matter for the application of the law (see [Government bill 2016/17:129 p. 38 onwards](#)).

The Anti-Money Laundering Act's requirement to achieve sufficient customer due diligence thus takes precedence over the right to a payment account with basic functions under the Payment Services Act.

Finansinspektionen (FI), following authorisation in Chapter 8, section 1 of the Anti-Money Laundering Act and section 18 of the Ordinance (2009:92) on Measures against Money Laundering and Terrorist Financing, has issued regulations (FFFS 2017:11) on measures against money laundering and terrorist financing, which contain requirements on measures for identification checks.

## Appendix 2 – Companies and associations

The Committee has limited its report to the right to a payment account for consumers. However, in the course of its work, the Committee has been informed of and wishes to draw attention to the following:

- Reasons for refusal and/or cancellation of payment accounts for companies and associations are sometimes considered unclear and the forms to be filled in to obtain KYC are deemed difficult to understand. Furthermore, the Committee has been informed that a high proportion of cash payments in relation to turnover is perceived as a reason for refusing or cancelling a payment account.
- In a report from 2025, the Swedish Fintech Association writes that 31 per cent of their member companies have suffered from "de-risking", which according to the association's definition means that they have had difficulty creating/maintaining a customer relationship with a bank or have been threatened with having their account closed. The Swedish Fintech Association wants to introduce a legal requirement for banks to report in writing the reasons why fintech companies are de-risked. They also want the right to appeal the decision to Finansinspektionen.<sup>55</sup>
- In Denmark, a statutory right to a basic business account has been introduced in some Danish banks.<sup>56</sup> Danish companies and associations thus also have the right to complain to an independent dispute resolution function, similar to the possibility for consumers to complain to ARN in Sweden. Previous inquiries in Sweden, most recently the Payment Inquiry, have chosen not to propose a general right to a payment account for companies and associations.<sup>57</sup> This is because of the more complex risk profile of legal entities.

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<sup>55</sup> [https://www.swefintech.se/\\_files/ugd/302c4a\\_9e16b55f9bf84eac9258a408ff7c026b.pdf](https://www.swefintech.se/_files/ugd/302c4a_9e16b55f9bf84eac9258a408ff7c026b.pdf) (retrieved 27.11.2025).

<sup>56</sup> <https://www.finanstilsynet.dk/finansielle-temaer/forbruger-og-investorinformation/spoergsmaal-og-svar/pengeinstitutter> (retrieved 27.11.2025).

<sup>57</sup> The state and the payments , SOU 2023:16.