



The Norwegian Ministry of Culture and Equality

Strategy

Expression Preparedness

National Strategy for Open and Enlightened Public Discourse



Foreword

Freedom of expression is not just a right – it is the lifeblood of a vibrant democracy. It helps us to create the kind of society we want to be part of and to build bridges between people with different experiences, values and perspectives.

Our public discourse needs to not only tolerate disagreement, but also to value it; a society in which diverse voices are not only given space, but are listened to; where we do not retreat into silence, but engage with one another in a spirit of openness and curiosity.

In these times of rapid global change, and with technology, politics and culture more closely intertwined than ever before, we need to rethink how we live together – and how we communicate with one another. In this changing landscape, we need to re-examine and strengthen our understanding of freedom of expression.

The Norwegian Government is committed to building a society where everyone has a genuine opportunity to take part in the public discourse, and where freedom of expression is not merely a legal right but a lived reality, underpinned by knowledge, access and safety. It seeks a society where technology is used to strengthen our community rather than divide it, and where we work together to foster a culture of respectful dialogue, both with one another and about one another.

This strategy is a step in that direction. Rather than seeking to control public debate, it aims to strengthen it. Instead of restricting the space for expression, it seeks to make it more open, accessible and inclusive.

We are facing important choices. To safeguard and strengthen our democracy, we must invest in the foundations that sustain it: trust, participation and public discourse that is open and enlightened.



A handwritten signature in black ink that reads "Lubna Jaffery".

Lubna Jaffery
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Photo: Ilja C. Hendel/KUD

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1

Introduction

1.1 Why do we need a national strategy?

Freedom of expression is both an individual right and a prerequisite for a functioning democracy, as well as essential for exercising other fundamental rights, such as freedom of assembly and freedom of religion. Open and enlightened public discourse, with a free and independent press and academic freedom, strengthens society. Protecting freedom of expression is therefore an important part of safeguarding our national security. It also serves as a driver of innovation and progress by facilitating the free exchange of ideas, critique and new ways of thinking.

In Article 100 of the Norwegian Constitution, freedom of expression is grounded in three principles: truth, autonomy and democracy.

The principle of truth holds that the best way to arrive at the truth is through the exchange of opinions, where claims are tested and refined through engagement with other perspectives.

The principle of autonomy recognises that individuals must possess a certain level of competence to function as independent members of an open society. This competence is developed by engaging with others, listening to their arguments and considering alternative perspectives.

The principle of democracy requires important societal processes to be conducted with transparency, and opinions to be freely exchanged prior to elections and key decisions. This public discourse – which takes place in editorial media, on theatre stages, in literature, in schools and universities, and on social media and other digital platforms – is as fundamental to democracy as holding elections and participating in them.

This strategy outlines the Norwegian Government's efforts to facilitate freedom of expression and a robust public sphere in Norway. Through this strategy, the Government continues and reinforces a long-standing democratic tradition, which has been enshrined as a constitutional duty since 2004.

Article 100, sixth paragraph, of the Norwegian Constitution requires government authorities to 'facilitate open and enlightened public discourse'. This infrastructure requirement entails a responsibility to ensure freedom of expression in practice by ensuring that effective channels exist for the exchange of information and opinions in society. The preparatory works to the Constitution (Report to the Storting no. 26 (2003–2004), Section 7.6.2) highlight how this provision can help raise awareness of the authorities' responsibility to ensure that freedom of expression is exercised in society. They also note that the provision imposes procedural requirements in cases where the authorities are considering measures that may impact on freedom of expression. At the heart of the infrastructure requirement is the duty of the authorities to act when the public sphere is not functioning in a way that supports the three principles underpinning freedom of expression.

Freedom of expression in Norway is, by and large, very well protected. In numerous international comparisons, Norway consistently has top ranking. Freedom of the press is unmatched, and in few countries there is such strong support in the population for freedom of expression as a core value. For the vast majority of people, expressing opinions and participating in public debate is now far easier than it was in the past. Opportunities to access information, knowledge and diverse perspectives seem virtually unlimited. A wide range of voices and viewpoints are now seen in public discourse, including from minority groups. Together, these factors play a central role in sustaining the strong sense of community and trust in Norwegian society.

However, this privileged position cannot be taken for granted. The framework conditions for public discourse in Norway are constantly being shaped by technological advances, global online platforms and a rapidly changing cultural, social and political context. Freedom of expression therefore requires continuous focus and active stewardship from political authorities, civil society and every one of us.

Open and enlightened public discourse is currently under pressure from many different quarters. The platform and data economy has given large technology companies considerable power over public discourse and challenged the democratic function of editorial media. The rise of digital forms of communication, where interactions are not face-to-face and participants can remain anonymous, has lowered the threshold for insulting, abusive or discriminatory discourse. Globally, superpower rivalries and geopolitical tensions increase the risk of hybrid

threats, including disinformation, election interference and other forms of unwanted influence. The Norwegian Total Preparedness Commission concluded that Norway must prepare for a prolonged period in which it is continuously exposed to influence operations by both state and non-state actors. Furthermore, the digitalisation of society is making it increasingly difficult for those who are not digitally connected to participate fully. Those who struggle to access or use digital services and online platforms are effectively excluded from important public discourse.

Open and enlightened public discourse depends on as many people as possible having access to relevant and accurate information, opportunities to engage with issues they consider important, being informed when their interests are at stake, and having the opportunity to speak out when they deem it necessary. A society in which citizens are prepared in this way has what the Norwegian Commission for Freedom of Expression has termed 'expression preparedness'.¹ Expression preparedness exists when the public sphere functions in a way that promotes the seeking of truth, democracy and the individual's freedom to form opinions.

The Norwegian Government facilitates freedom of expression and open and enlightened public discourse across many areas of society. This entails supporting the arenas in which ideas are communicated, shared and received, as well as promoting equality by removing barriers and reducing disparities so that everyone can participate and contribute across different social arenas. It involves fostering a healthy culture of expression, ensuring transparency, access to information and effective communication

¹ NOU 2022: 9, page 16.

The National Security Strategy identifies six fundamental security interests:

- A free and independent Norway
- A robust democracy
- A safe society with a high level of trust
- An open and adaptable economy
- Allied solidarity and unity in Europe
- A world that seeks solutions based on international law

Democracy, the rule of law and human rights are at the heart of who we are and what we stand for in Norway. Trust in one another and in the key public institutions strengthens our ability to withstand threats and influence attempts. Accordingly, a central objective of our security policy is to build a more resilient society. We all need to understand the threats we face, support public discourse through editorial media, enhance the public's capacity for source evaluation and counter disinformation and covert influence attempts. We will ensure that regulatory frameworks keep pace with technological advances and that technology companies are effectively regulated, in close cooperation with the EU.

within public bodies, while safeguarding against unlawful and harmful speech. We must remain vigilant of threats that could undermine open and enlightened discourse, such as disinformation and polarisation, and ensure we have the knowledge needed to identify risks and emerging challenges early, so that preventative and targeted measures can be implemented.

The strategy is also part of the Government's follow-up of the National Security Strategy, which describes 'enlightened public discourse supported by a free and independent press and academic freedom' as fundamental to Norway's security interests.

This is the focus of the strategy, which sets out principles guiding the Government's overarching efforts in this area and highlights relevant priority areas and measures. The strategy is primarily based on the report from the Norwegian Commission for Freedom of Expression (NOU 2022: 9) and the consultation that followed. The Government works continuously in many different areas to follow up on the Commission's assessments and recommendations.

1.2 Structure of the strategy

Chapter 2 focuses on the Norwegian Government's efforts to meet the infrastructure requirement:

- Section 2.1: *Infrastructure for freedom of expression* – examines the key components of the infrastructure for freedom of expression and public debate, as well as the institutional prerequisites for exercising freedom of expression across different areas of society.
- Section 2.2: *Culture of expression* – focuses on the *perceived* framework for freedom of expression and how it impacts on people's ability and willingness to participate in public debate and in society more broadly.
- Section 2.3: *Transparency, access and participation* – explores transparency and participation, including within public administration, as a prerequisite for informed public debate in general and for the role of editorial media in particular.
- Section 2.4: *Unlawful and harmful speech* – covers the use of prohibitive measures or other measures directed at specific forms of expression.
- Section 2.5: *Distortion and manipulation of opinion formation* – examines challenges such as disinformation, echo chambers and polarisation, and how these phenomena can distort, disrupt or undermine open and enlightened public discourse.
- Section 2.6: *Knowledge* – deals with the generation and dissemination of knowledge as a prerequisite for implementing targeted measures to protect freedom of expression, should the need arise.

Chapter 3 *Norway and the world*, examines how freedom of expression and public discourse in Norway are influenced by the international situation: geopolitical tensions, technological advances and global regulatory frameworks.

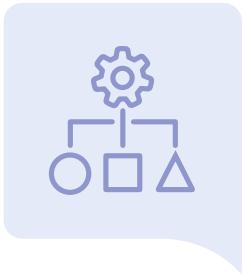
Chapter 4 *From principle to practice*, outlines the ongoing follow-up of the strategy.

2

The Government's efforts to promote an open and enlightened public discourse



2.1 Infrastructure for freedom of expression



2.1.1 Introduction

The various components of the infrastructure for freedom of expression each have distinct characteristics, functions and challenges. There are nonetheless some common, underlying considerations that form the basis of the Norwegian Government's policies in all of these areas. One of these is *independence and autonomy* from the authorities, often described as the arm's length principle. Media, online platforms, cultural institutions, research environments and organisations cannot contribute to the seeking of truth, democracy and the free formation of opinion if the information and exchange of views they present are controlled by the authorities or political decisions. Other considerations are *diversity and accessibility*, which in turn are linked to the democratic rationale underlying freedom of expression. For the various components of the infrastructure to function as intended, they must be open and accessible to all citizens, including minorities and marginalised groups. Moreover, the sectors should reflect the diversity of Norwegian society.

2.1.2 Language, reading skills and reading engagement

Expression is primarily conveyed through language, although actions can also constitute forms of expression. When political debate and public discourse take place in a language that most people are proficient in, it enables broad participation and prevents important debates of broad public relevance from being confined to closed circles. It is therefore essential to use and maintain a common national language.

In Norway, the Norwegian language serves as a language that underpins society, and under Section 4 of the Language Act, Norwegian (both *Bokmål* and *Nynorsk*) has the status of primary national language. The Act uses the term 'primary national language' descriptively, as Norwegian is the majority language and therefore the most important language for democratic discourse. The preparatory works for the Act state that its purpose is 'a clarification of the infrastructure requirement in Article 100, sixth paragraph, of the Norwegian Constitution'.²

² Prop. 108 L (2019–2020) *The Language Act*.

In addition to safeguarding Norwegian as the common national language, it is necessary to protect and preserve the Sámi languages, Norwegian Sign Language and the national minority languages. A core value in a liberal society is respect for minority interests. This requires a targeted, ambitious and proactive language policy that reinforces Norwegian in the context of the widespread use of English. The policy must also support *Nynorsk* as the least used written Norwegian language and safeguard the other languages for which the Government has national responsibility, ensuring they are preserved alongside Norwegian. It also involves the opportunity to establish public spheres where sign language users, the Sámi population and national minorities can develop their own collective identities. In this context, language serves as both a key carrier of culture and a marker of identity.

The Language Act places a responsibility on public bodies to protect and promote the national minority languages (Kven, Romani and Romanes) and Norwegian Sign Language. The Sámi Act establishes that the Sámi languages and Norwegian are of equal status and sets out rules on the use of Sámi languages both within and outside the administrative area for Sámi languages.

Responsibility for the use, development and strengthening of Norwegian and Sámi, and for the protection and promotion of the national minority languages and Norwegian Sign Language, extends across all sectors. For a language to serve as a foundation of society, its status must be secured across sectors and throughout all areas of working life. Key factors include the provision of high-quality and relevant media content in Norwegian, the development of

specialist terms in Norwegian, advances in language technology, and access to literature in Norwegian. Individuals whose first language is not Norwegian require targeted measures to ensure both language comprehension and social engagement.

Language comprehension is developed throughout life. Primary and lower secondary schools are responsible for providing foundational language education. The languages of instruction are Norwegian, the Sámi languages and Norwegian Sign Language (see the Education Act, Section 15-1). The Integration Act provides for immigrants having the opportunity to learn Norwegian. Effective instruction in reading and writing, including training in critical analysis of texts and genres, cultivates the skills necessary to interpret, evaluate and organise information. Good language skills also stimulate critical and independent thinking, source evaluation and nuanced understanding.

Reading is a key gateway to information, writing and critical thinking. Reading practice is therefore an important part of school work and must continue throughout life. Maintaining concentration when reading long texts is crucial for exploring complex issues, developing in-depth knowledge and thinking independently. The desire to read is the key to extended reading, and promoting reading engagement is a priority area for the Norwegian Government. Measures to support reading are outlined in the reading engagement strategy (*Sammen om lesing*) and the national reading programme (*Tid for lesing*). In July 2025, the Government announced an additional investment of NOK 1 billion over four years to support a national reading initiative.

Even when a shared language is mastered, barriers to communication, understanding and participation can still arise, for example through the use of complex language or technical terminology. Unclear or unnecessarily complicated language from government agencies can be alienating. It can also make it harder for people to exercise their rights and can erode trust in public institutions. Section 9 of the Language Act requires public bodies to 'communicate using clear, accurate language adapted to the target audience'.

Norwegian remains in a dominant position as a common language in Norway, but the use of English is increasing in some areas. Research and higher education are sectors where English is increasingly being used, weakening Norwegian as a language of academic discourse. To support the development and use of Norwegian in academia, the Government devised the *Action Plan for the Norwegian Language in Academia* in 2023. The requirement for mandatory Norwegian lessons for doctoral candidates and postdoctoral

researchers without documented proficiency in Norwegian, Swedish or Danish at A2 level was removed in 2025, but institutions must continue to offer free Norwegian courses for this group. The Government continues to follow up the 20 other measures outlined in the action plan to strengthen Norwegian as an academic language.

Ensuring that computers, language technology and artificial intelligence (AI) work effectively in Norwegian is essential both for the language itself and for the quality of digital communication, task execution and collaboration. From 2025, the National Library of Norway has been tasked with training language models in Norwegian and Sámi. The goal is to facilitate safe and responsible AI use that supports Norwegian and Sámi language and culture, as well as democratic values. Recent political developments and technological advances highlight the need for Norway to develop its own transparent, documented and representative language models.

The Norwegian Government will

- protect, develop and strengthen the Norwegian language to ensure it remains a language that underpins society
- protect, develop and strengthen the Sámi languages in accordance with the provisions of the Sámi Act
- protect and promote national minority languages and Norwegian Sign Language
- ensure that all sectors take their share of the responsibility for developing and maintaining language as part of the infrastructure for democracy and participation
- ensure that public administration communicates clearly, accurately and in a manner suited to the audience
- promote reading skills and reading engagement, including in schools

Priority areas and measures

- follow up the measures on plain language, AI and language models as outlined in the Government's digitalisation strategy, *The Digital Norway of the Future 2024–2030*
- follow up the *Action Plan for the Norwegian Language in Academia*
- follow up the reading engagement strategy (*Sammen om lesing*) and the national reading programme (*Tid for lesing*)
- develop guidance for followup of sectoral responsibility for language policy in government ministries
- devise a new action plan for the Kven language

2.1.3 Editorial media

Functions of editorial media

Editorial media enjoy special protection under Article 10 of the European Convention on Human Rights (ECHR).³ This reflects their special democratic role and their function as a 'public watchdog'. Editorial media define their role in society in the introductory provisions of the Code of Ethics of the Norwegian Press:⁴

A free, independent press is among the most important institutions in a democratic society. [...] The press has important functions in that it carries information, debates and critical comments on current affairs. [...] It is the right of the press to carry information on what goes on in society and to uncover and disclose matters, which ought to be subjected to criticism. [...] It is the task of the press to protect individuals and groups against injustices or neglect, committed by public authorities and institutions, private enterprises, or others.

It is this role that makes editorial media a central component of the infrastructure for freedom of expression, and that forms the basis of the Government's media policy. Media policy is based on a social contract in which editorial media provide services of public value, and society, in return, grants them certain 'privileges', whether through special legal protection or financial support. The term 'privilege' is, however, misleading, partly because the aim is not

to support the media sector in itself, but to ensure that the public has access to a diverse range of independent sources of information, journalism and debate.

The changing landscape

The traditional business model of editorial media has centred on producing editorial content for sale to media users, while also generating revenue by selling advertisers access to that audience.

Historically, editorial media held an extremely strong position as the principal gatekeepers to the public sphere and as a key distribution channel for advertising. Digitalisation has, however, reshaped this landscape in numerous ways, in terms of how services and content are produced, distributed and consumed.

The physical infrastructure for distributing content is now largely digital, with broadband and digital broadcasting networks. Nevertheless, printing and physical distribution, including via the postal service, still play a part in bringing media content to the public.⁵ The traditional editor's role has shifted from the sole gatekeeper – with extensive control over the flow of information in society – to one of several. New actors have emerged, notably global technology giants and social media platforms. Most people are no longer merely passive consumers but active participants, content creators and distributors. Nowadays, anyone can communicate

3 For example, [European Court of Human Rights \(15890/89\) – Commission – Decision – Jersild v. Denmark](#) (EMD-1989-15890), paragraph 31.

4 [The Norwegian Press Association, Code of Ethics of the Norwegian Press](#).

5 Norwegian Media Authority, [Økonomien i Norske aviser 2020-2024 \[the economy of Norwegian newspapers 2020-2024\]](#). The Norwegian Media Authority estimated print advertising and subscription revenue at NOK 5.1 billion in 2024. For the first time, revenue from online editions in 2024 exceeded revenue from printed newspapers.

directly with a broad audience via the Internet and social media, including in styles and formats that can be difficult to distinguish from more traditional media content. Meanwhile, professional actors, including governments, politicians, companies and organisations, increasingly communicate directly with citizens outside the framework of editorial media.

These developments have also transformed the media economy, contributing to a steep decline in newspaper advertising revenue. In the digital media environment, revenue from users is challenged by competition from free content and widespread expectations that access to content should be free. Meanwhile, advertising revenue is under pressure in a market where companies such as Meta (Facebook, Instagram) and Alphabet (Google) have positioned themselves as the primary platforms for advertising. In 2024, these global actors earned roughly three times the advertising revenue of Norwegian newspapers in the domestic market.⁶

As social media have become central platforms for information, interaction and public debate, they have also emerged as an important distribution channel for editorial content and a point of contact between editorial media and the public. Fewer people now read, watch or listen to news from editorial media in newspapers, on TV or on the radio, while an increasing number access news via social media. In 2024, 57 per cent of the Norwegian population used social media as a news source.⁷

The largest online platforms have considerable control over what type of content users are exposed to. They rely heavily on AI-driven recommendation algorithms, which determine both the content that is promoted and prioritised and the content that is restricted. Several platforms have acknowledged that these algorithms limit editorial content. Meta, for example, maintains that users are more interested in content from friends and acquaintances, and in content they find engaging. Such strategies make it harder for editorial media to reach audiences on social media, potentially limiting the public's access to verified and credible information. Reaching younger users is particularly challenging, as their primary source of news tends to be social media.

Editorial media are more important than ever

The emergence of new actors and platforms, shifting roles and the blurring of boundaries between sectors, markets, media services and genres has not diminished the importance of editorial media for democracy. On the contrary, they have become even more crucial, particularly as a corrective and counterbalance to the flood of unedited, unverified and biased information encountered on digital platforms.

Although the Norwegian Commission for Freedom of Expression concluded that existing studies do not provide grounds to claim that disinformation, echo chambers or polarisation are acute problems in Norway, we are observing global trends that are potential threats to

6 Norwegian Media Authority, *Medieøkonomi: Økonomien i norske aviser 2020–2024 [the economy of Norwegian newspapers 2020–2024]*.

7 Statistics Norway, *Norsk mediebarometer 2024 [Norwegian Media Barometer 2024]*.

trust in public institutions, democratic governance and the public sphere itself. These are trends that Norway must remain vigilant of (see Section 2.5). A strong and independent media sector is an important component of resilience to such challenges.

In a time when almost anyone can publish content, there is rarely a shortage of information or opinions. What is in short supply, however, is content with the credibility, reliability and quality needed to support informed democratic debate and opinion formation. The main challenges today include distinguishing reliable information from unreliable information, well-founded perspectives from conspiracy theories, and balanced reporting from biased or prejudiced accounts. Editors and editorial media continue to play an essential role here as guarantors of open and enlightened public discourse.

Editorial freedom and the arm's length principle

The media's role as a 'public watchdog', monitoring the exercise of public power and facilitating political debate, requires it to operate independently of the power structures it observes and comments on. It also requires public trust in the media's independence. Only then can media content serve as a foundation for free and informed political opinion formation. Genuine editorial freedom – from authorities as well as owners – is therefore fundamental to the media's role as infrastructure for public discourse. Editorial freedom is protected under the Media Liability Act and the Broadcasting Act.

Government grants to editorial media can undermine public trust in their independence from the authorities. Without freedom safeguards, changes in funding levels could be perceived as a reward or punishment for a media outlet's editorial line on the government. Media support schemes are therefore designed so that grants are allocated according to objective and verifiable criteria wherever possible. The Media Support Act also removes the ministry's right to issue instructions to, or overturn decisions by, the Norwegian Media Authority (NMA). Appeals are dealt with by the Media Appeals Board, which, like the NMA, operates independently of the ministry in individual cases.

Credibility, quality and public trust

For editorial media to serve as infrastructure for public discourse, they must not only be independent of the authorities but also follow rigorous methods and principles of source evaluation that ensure the information provided is credible and can be relied on for forming opinions. These are editorial decisions, and responsibility for them therefore rests with industry bodies, the system of self-regulation and the individual editorial team.

The media's ethical self-regulation system is grounded in its societal mission and sets out the rights and responsibilities that ensue from this. The Code of Ethics of the Norwegian Press contains ethical standards and rules for the press and is enforced by the Norwegian Press Complaints Commission (PFU), whose remit covers, in principle, all journalistic media.

The Media Liability Committee⁸ concluded that the self-regulation system has played an institutionalising role, and that editorial media are defined by their adherence to journalistic norms and principles grounded in professionalism and industry affiliation.

Authorities can, nevertheless, help strengthen the credibility and quality of the media, as well as public trust in it. An important element is ensuring that editorial media have a secure financial basis to produce high-quality journalism. This is supported through direct media grants, funding of the Norwegian Broadcasting Corporation (NRK) and the agreement with TV2 as a commercial public broadcaster.

Another important responsibility of the authorities is to maintain a robust and up-to-date legal framework for the production and publication of journalism. The Media Liability Act promotes serious and credible journalism by imposing greater legal responsibilities on editors, including criminal and civil liability for published content. Source protection and restrictions on the use of compulsory measures ensure that potential sources can trust that the media will not be forced to identify them or that their identities will be exposed as a result of searches, confiscation of materials or disclosure orders directed at the media. This also contributes to public trust in the accuracy and reliability of the information reported by the media.

'Alternative media' are actors that seek to serve as a corrective to the established media. They are often critical of how established media fulfil their societal mission, and challenge journalistic principles. The emergence of alternative media is therefore linked to a lack of trust in established media and, by extension, in the authorities and media policies that underpin them, both financially and otherwise.

Alternative media can serve as a valuable corrective and fill blind spots in public debate. They can also give voice to marginalised groups that receive less coverage in established media. However, some actors, while disregarding journalistic ethical standards and widely accepted practices, deliberately mimic editorial media or use journalistic forms of expression to attract interest and convey a false sense of credibility. This can range from advertorial content to deliberate efforts to undermine trust in democratic institutions as part of hybrid warfare.

It is essential that public authorities do not treat media differently based on the perspectives or political views they present. However, it must be considered legitimate to distinguish between media based on the methods they employ. Although the Code of Ethics of the Norwegian Press was devised by organisations with little representation among 'alternative' media, it largely reflects widely accepted principles of journalistic methods. It is these journalistic methods that underpin the democratic role and watchdog function of editorial media.

⁸ NOU 2011: 12 *Ytringsfrihet og ansvar i en ny mediehverdag* [freedom of expression and responsibilities in a new media landscape].

The Norwegian Government will

- support the democratic role of editorial media by promoting a diverse range of sources, content and consumers, and by preventing the emergence of thematic or geographic blind spots
- safeguard the media's editorial freedom, including through the administration of government funding on the basis of the arm's length principle
- ensure a robust legal framework for the production and publication of journalism
- recognise the critical role of editorial media in society, including through accessibility for the press and prioritising forums for investigative journalism and critical inquiry

Priority areas and measures

- devise a media policy framework for the period 2027–2030
- implement the European Media Freedom Act
- facilitate dialogue between Norwegian media and platform companies

2.1.4 Internet and platforms

Internet as a channel for expression and information

The Norwegian Commission for Freedom of Expression found that the Internet is now the foundational infrastructure for exercising freedom of expression and freedom of information for most Norwegians. Ninety-four per cent use the Internet at least once on a typical day, and virtually all 16–24-year-olds are online daily. In 2024, the Norwegian population spent an average of 4 hours and 35 minutes online each day. Young people aged 16–19 years spend the most time online, with more than 7.5 hours on a typical day.⁹

Online platforms and social media play a wide-ranging role as sources of information. They provide access to content from professional actors such as editorial media, organisations and political parties. Users also encounter information and viewpoints from private individuals, including family, friends and accounts they follow. In addition, these platforms can serve as tools for more direct access to first-hand or second-hand sources.

An ever increasing share of the population's news consumption now takes place digitally and via social media. Six in ten people watch or read news on social media platforms. Among those aged 9 to 24 years, social media is the most common news source.¹⁰ This is consistent with a 2024 survey by the NMA, which found that TikTok, Snapchat and YouTube are the most popular platforms for news among 8–18-year-olds.¹¹

Social media have also revolutionised people's opportunities to express themselves and participate in the public sphere, though not everyone makes active use of them. Around half of the population actively engage with social media. However, only around 10 per cent regularly offer opinions in the public sphere on politics or society.¹² Taking part in public discourse online is no guarantee of being heard. Some people have amassed large audiences and gained significant influence over discourse in their fields through their social media channels and profiles. In general, though, who is actually listened to and who has influence depends on formal and informal power structures that largely operate online in much the same way as they do elsewhere in society. When discussions in comment sections and forums only involve a small group of active participants, their perceived reach can far exceed the reality.

Meanwhile, it is important to emphasise that digital platforms are not just news sources or arenas for public debate; they are also used for entertainment, gaming, online shopping, learning, creative expression, mobilisation, social movements, activism, counterpublics and, not least, building and maintaining social relationships.

Risk factors associated with using the Internet and social media

Online activity is associated with positive experiences and countless opportunities for social connection, creativity, learning and the exchange of ideas. However, users are also exposed to digital risks, including privacy issues, body image pressures, bullying and abuse. The Norwegian

9 Statistics Norway, *Norsk mediebarometer 2024 [Norwegian Media Barometer 2024]*.

10 Statistics Norway, *Norsk mediebarometer 2024 [Norwegian Media Barometer 2024]*.

11 Norwegian Media Authority, *Barn og medier 2024 [children and media 2024]*.

12 NOU 2022: 9 *En åpen og opplyst offentlig samtale [open and enlightened public discourse]*, p. 96.

Commission for Freedom of Expression reviewed research on the potential harmful effects of social media and found that drawing definitive conclusions is difficult, with individual studies pointing in different directions. The Media Harm Committee (NOU 2021:3) and the Screen Use Committee (NOU 2024:20) also reviewed available research on the harmful effects for children and reached similar conclusions.

There is widespread concern that the Internet and social media facilitate the propagation of hate speech, threats and disinformation, and that recommendation algorithms can lead to echo chambers and further polarisation in society. The Norwegian Commission for Freedom of Expression concluded that research presents a more nuanced picture than is often portrayed in the public debate on these issues. However, significant developments have taken place in this area since 2022 (see Section 2.5).

There is also a risk in that social media have become a main source of news, especially for young people. Even though editorial media publish quality-assured content on these platforms, it can be difficult for users to distinguish between different sources and determine which are trustworthy. This could, in turn, lead to many misunderstanding or undervaluing the role and importance of journalism and editorial media in safeguarding freedom of expression and open and enlightened public discourse.

Furthermore, there is a risk that key areas of the public sphere are guided by commercial interests through recommendation algorithms designed to maximise user time, engagement and revenue.

Generative AI impacts on public discourse and reinforces risk factors

Generative AI is a technology with the potential to significantly shape societal development. It comprises machine learning models and AI services capable of producing unique content based on the data they are trained on and the instructions they receive from humans (often referred to as prompts). They can generate text, images, audio and video, among other formats. Generative AI is built on underlying AI models, such as a large language model (LLM), and provides completely new tools for addressing societal challenges, improving public services and creating value in the business sector. However, generative AI can also increase the risks associated with using digital platforms. Machines equipped with generative capabilities can create new content, participate in public discourse in a way that mimics human behaviour, and convey opinions, attitudes and values. AI also accelerates the pace of content production. There is reason to believe that a substantial proportion of online content will be fully or partially generated by AI within a few years.

A report published by the Norwegian Human Rights Institution (NIM) and the Norwegian Board of Technology in December 2023 highlights how generative AI can challenge the processes that freedom of expression is meant to protect, namely, 'the seeking of truth, the promotion of democracy and the individual's freedom to form opinions' (see Article 100, second paragraph, of the Norwegian Constitution).¹³ *The seeking of truth* is challenged because generative AI does not engage with actual reality, only with statistical patterns. The generative

¹³ Norwegian Board of Technology's Human Rights Institution, [*Generativ kunstig intelligens og ytringsfrihet \[generative AI and freedom of expression\]*](#) (2023).

models therefore have no inherent understanding of truth and lies. *The individual's freedom to form opinions* is compromised when information is machine-generated and designed to hold our attention and create engagement, for example by reinforcing cognitive biases or prejudices. *The promotion of democracy* may also be threatened when generative AI is used to target, manipulate, censor or fabricate information.

AI is therefore likely to shape political debate and the public agenda, influencing both how voters receive information and what information they receive about elections, political parties and candidates. The combination of AI, social media and cyber operations has opened up new opportunities for both foreign and domestic actors to carry out covert election interference.¹⁴ Biases in training data can also lead AI models to reproduce or generate discriminatory content. A particularly concerning aspect of AI developments is that it can sometimes be almost impossible to distinguish between fake and genuine content. This could reinforce mistrust in digitally mediated information – including content from credible sources – thereby weakening the role of digital platforms as infrastructure for freedom of expression.

Public authorities' responsibilities and scope for action

As outlined above, online platforms play a key role in the exchange of information and viewpoints, as well as in facilitating public debate. However, certain risks are associated with these platforms, which may be further amplified by developments in generative AI. The public authorities therefore have an important responsibility to ensure that the digital infrastructure

functions in a way that supports open and enlightened public discourse.

The authorities do this through a range of measures: financial instruments (e.g. grants for the expansion of high-speed broadband in areas where commercial deployment is not viable), enhancing and sharing expertise (e.g. in schools or by developing guidance materials), establishing common standards and architectures, and regulation (e.g. data protection, radio spectrum management, the protection of minors and legal liability for content).

However, digital service providers are predominantly located outside Norway. This limits the national scope for action and means that a well-functioning digital infrastructure supporting freedom of expression is largely dependent on international cooperation and intergovernmental regulation.

Several EU regulations provide important frameworks for the provision of digital services. The Norwegian Commission for Freedom of Expression identified the Digital Services Act (DSA) as the most important framework for regulating intermediary liability online in the years ahead. Other key regulations include the European Media Freedom Act (EMFA), which aims to safeguard media diversity and the independent position of the media, and the AI Act, which provides for the private and public sectors using AI technology in an innovative and ethically responsible manner. Norwegian authorities must therefore take an active international role in influencing the development of these regulatory frameworks.

¹⁴ Report by the Expert Group on Artificial Intelligence and Elections, *Kunstig intelligens og demokratiske valg [Artificial Intelligence and Democratic Elections]* (2025).

In 2023, a think tank appointed by the Nordic Ministers of Culture issued recommendations for strengthening democratic dialogue in the Nordic countries in light of the rapid technological advances and the influence of technology

giants on public debate. The think tank recommends that the Nordic countries work together to become a unified 'tech-democratic' region, and efforts have been initiated to develop a safer digital democracy for children and young people.

The Norwegian Government will

- ensure a secure and future-ready digital infrastructure, with high-speed broadband and reliable mobile coverage for all
- enhance digital literacy among groups facing digital barriers and exclusion, so that everyone can fully participate in the digital environment
- provide children with a safe and active digital childhood, where they are protected from harmful content and can express themselves, search for information and engage in cultural life and society more broadly
- ensure that AI developed and used in Norway is guided by ethical principles and respects human rights and democratic values
- prioritise implementation of EEA-relevant EU regulations and take an active international role in shaping the development of regulatory frameworks

Priority areas and measures

- follow up the *National Strategy for Artificial Intelligence* and the *National Digitalisation Strategy 2024–2030*
- follow up Report to the Storting no. 32 (2024–2025) *Safe Childhood in a Digital Society*
- incorporate the *Digital Services Act* (DSA) into the EEA Agreement and Norwegian law
- follow up the recommendations of the Expert Group on Artificial Intelligence and Elections
- follow up the recommendations of the Nordic Think Tank for Technology and Democracy

2.1.5 Arts and cultural life

Public discourse takes place across a wide range of arenas and through multiple channels. At the heart of this landscape is the arts and cultural sector. The Enger Committee, which reviewed the Norwegian Government's cultural policy in 2013, stated the following:¹⁵

The Committee wishes to emphasise that a rich and diverse cultural life is a prerequisite for a vibrant democracy and for protecting freedom of expression, and regards this as a key rationale for cultural policy.

Art and culture provide individuals and society with arenas for social cohesion, enjoyment and a sense of belonging, as well as for bridging divides, promoting integration and preventing social exclusion. They foster trust, tolerance and solidarity across different population groups. Research also indicates a correlation between participation in cultural activities and engagement in democratic processes.¹⁶ The European Court of Human Rights (ECtHR) also emphasises the significance of arts and culture for democracy in its assessments.

The Norwegian Government's responsibility in cultural policy is primarily linked to funding various types of cultural institutions and grant schemes for the development, production and dissemination of art and cultural expressions across different genres within the independent cultural sector. Over the years, public funding has helped to establish and maintain diverse

artistic and cultural output and a robust infrastructure of arts and cultural institutions throughout Norway. These institutions host debates and discussions and serve as venues for expressions such as film, performing and visual arts, and various forms of performance. They also hold concerts and facilitate talks, as well as other forms of civic participation and voluntary activities.

The arts and cultural sector plays a crucial role in ensuring that public discourse remains open and enlightened. For example, the book industry, which includes authors, translators, illustrators, publishers, booksellers, book clubs, streaming services and distribution centres, serves as a fundamental infrastructure for a vibrant language and an important channel for a diversity of voices, life experiences and stories that convey knowledge and insight. Libraries play a key role as inclusive spaces for learning, dialogue and debate, providing room for discussion and disagreement. They also help to strengthen critical media literacy among the population, thereby strengthening resilience to disinformation. The Norwegian Government will develop a new library policy to take effect from 2026, which will examine the role libraries should play in the efforts to prevent extremism.

Market corrections and the arm's length principle

Quality and diversity are key objectives of cultural policy, both in terms of production and participation. Norway is a small language area and

15 NOU 2013: 4, *Kulturutredningen 2014 [the cultural report]*, p. 10.

16 Hammonds, W., *Culture and democracy, the evidence* (2023).

has a large geographic area and relatively small population. Market forces alone are therefore not enough to ensure a rich and diverse cultural sector. Much of cultural policy is designed as a market-correcting system, where public funding gives institutions the space to explore new forms of expression, offer both broad and specialised repertoires, and provide opportunities for new and unfamiliar voices. Overall, this strengthens public discourse by allowing a wider range of voices and expressions to be represented in our shared cultural arenas. Offering a variety of cultural expressions also increases the likelihood that audiences will find these institutions and arenas relevant. Maintaining diversity in artistic expression, voices and stories – and continually striving to include more – is therefore a key objective of cultural policy.

A further basic prerequisite for safeguarding the role of arts and culture in democracy, and for protecting freedom of expression, is that public funding is allocated at arm's length from the prevailing political priorities. To ensure that what is created and presented to audiences is credible as independent expression, artistic decisions must be founded on informed artistic judgement and expertise. For the arts and cultural sector to contribute to open and enlightened public discourse, participants must be confident that the opinions and expressions presented are free from political influence. If there is any suspicion that programmes or offerings in arts and cultural arenas have a hidden agenda or serve other interests, these arenas will lose their effectiveness as meaningful spaces for open debate.

Legal framework

Public authorities also support the arts and cultural sector as part of the infrastructure for freedom of expression through legal regulation.

At a general level, the Culture Act¹⁷ establishes that providing for a broad spectrum of cultural activities is a statutory responsibility of the central government and local and county authorities. In practice, this clarifies the infrastructure requirement relating to culture, as explicitly stated in the objects clause following an amendment adopted in March 2025.

The Copyright Act¹⁸ is often regarded as the most important law on culture in Norway. It enshrines the rights of creators and performing artists; those who write books, produce music or perform on stage. At its core, the law grants creators exclusive rights to control their works by reproducing them and making them publicly available. More broadly, the Copyright Act enables individuals to earn a living from creative activities and lays the foundation for the production of new art and culture. The Act also balances various other interests, for example, the public's and users' interest in access to creative works.

The Book Act¹⁹ aims to facilitate breadth, diversity and quality in literature published in Norway, while ensuring that the entire population can easily access this literature. It provides for the

17 Act no. 89 of 29 June 2007 concerning public authorities' responsibility for cultural activities.

18 [Act no. 40 of 15 June 2018 concerning copyrights](#).

19 [Act no. 64 of 16 June 2023 concerning the sale of books](#).

fixed-price system, which helps ensure stable and favourable conditions for those who produce and distribute Norwegian literature. The fixed-price system also supports the physical

infrastructure for freedom of expression by providing a sustainable basis for booksellers in smaller communities where selling books would not be viable.

The Norwegian Government will

- strengthen and facilitate an open, diverse and vibrant arts and cultural sector that is accessible to all
- administer public funding for cultural purposes in line with the arm's length principle and with the aim of achieving the highest standards of quality

Priority areas and measures

- follow up the revised Culture Act, including an assessment of the need for guidance on the arm's length principle and municipal planning
- follow up the new Book Act, including in relation to digital lending, price regulation and fixed pricing for higher education textbooks and specialist books for the professional market
- develop a new library policy
- follow up applicable strategies relating to culture, including the Government's strategy for cinemas and film dissemination (*Mer film sammen*); the extended national library strategy in effect until 2025 (*A Space for Democracy and Self-cultivation*); and the Government's video game strategy 2024–2026 (*Tid for spill*)

2.1.6 Schools

Schools are responsible for equipping pupils with the knowledge and skills to participate effectively in democratic processes. Democracy and citizenship form a cornerstone of the Norwegian education system. Pupils should learn to express their own opinions, navigate disagreements and respect differing viewpoints. Schools should also cultivate respect for diversity and promote the peaceful resolution of conflicts. Children and young people must be given opportunities to take part in democratic processes and contribute to daily school life. Through active participation in the school community, pupils learn how fundamental democratic values are applied in practice.

Primary and secondary schools have a broad mandate, as established in the Education Act and further detailed in the general part of the National Curriculum for Knowledge Promotion in Primary and Secondary Education and Training. This national curriculum sets out the learning objectives and the framework for the competencies pupils are expected to develop. In 2020, schools implemented the LK20/LK20S national curriculum.

This new curriculum was developed in an open, participatory process, with input from pupils, teachers, school heads and other educational actors. An evaluation of the curriculum over the period 2020–2025 will examine how the new syllabuses in the different subjects are being implemented and whether they are influencing school practices as intended.

The general part of the national curriculum makes it clear that education should promote support for democratic values and for democracy as a form of government.²⁰ It should help pupils develop an understanding of the rules of democracy and the importance of upholding them. Social engagement requires respecting and endorsing fundamental democratic values, including freedom of expression, mutual respect, tolerance, freedom of religion and faith, and the right to make independent choices. Democratic values should be fostered through active participation at all stages of education. Democracy and citizenship are prioritised as one of three cross-subject themes, and pupils develop knowledge of democracy, democratic values and attitudes across multiple subjects throughout their schooling.

The general part of the national curriculum also emphasises that schools should be places where children and young people experience democracy in practice. Pupils should feel that their voices are heard, that they can exercise meaningful influence, and that they can shape decisions that affect them. When their voices are heard, they learn how to make conscious, informed decisions. This also encourages inquiry, open and honest discussion, and confidence in expressing disagreement. Such experiences are a valuable part of pupils' learning and help prepare them to be responsible citizens.

Literacy and numeracy skills are fundamental tools for learning and understanding. They are also essential for active participation in democratic processes and for exercising the right to freedom of expression.

²⁰ Norwegian Directorate for Education and Training, *Overordna del – verdiar og prinsipp for grunnopplæringa* [*general part of the national curriculum – values and principles for primary and lower secondary education*].

Although schools perform well in many areas, international assessments such as PISA,²¹ TIMSS²² and PIRLS²³ show that a growing number of pupils are performing at the lowest proficiency levels in reading and mathematics, and that the education gap is widening. Fewer pupils read in their free time, and overall reading engagement is declining.

The International Civic and Citizenship Education Study (ICCS) examines how well pupils in Year 9 in Norwegian schools are prepared for active social engagement.²⁴ Pupils in Norway have previously shown good results in this study, but in 2022, Norway had the greatest decline among all participating countries in the knowledge component. Although pupils in Norway still score more than the international average, the proportion performing at the lowest proficiency levels has risen sharply, which is a cause for concern. However, ICCS 2022 also shows that 14-year-olds in Norway have become more active in discussing politics, societal issues and international events than in the 2009 and 2016 studies. Pupils in Norway also express strong support for democracy as a form of government.

Schools have access to resources and materials for use in civic education and the cross-subject theme of democracy and citizenship. Dembra (Democratic Preparedness Against Antisemitism and Racism) provides guidance, training and online resources to prevent various forms of

group-based hostility, including prejudice, xenophobia, racism, antisemitism, Islamophobia and extremism. At the heart of Dembra is the prevention of social exclusion and undemocratic attitudes through the development of democratic competence, with inclusion and participation, critical thinking and diversity awareness as central principles. The programme is aimed at schools and teacher education programmes in Norway.

The Norwegian Government has submitted Report to the Storting no. 34 (2023–2024) on improving learning, motivation and well-being for pupils in Years 5 to 10.²⁵ The report emphasises that civic education is a core part of the school's mandate and that it is concerning when levels of knowledge about democracy decline. It sets out a range of measures to reverse these negative trends through a more practical and varied school experience. Reading skills and engagement will be strengthened through the reading strategy (*Sammen om lesing*) and the national reading programme (*Tid for lesing*). School libraries and Norway's national centres for reading and writing will also be strengthened.

The Commission for Countering Extremism notes that establishing an inclusive learning environment in schools is also a way of strengthening democratic resilience. Many schools are doing important work by enabling pupils to feel a sense of belonging, achievement, recognition

21 Programme for International Student Assessment (OECD).

22 Third International Mathematics and Science Study.

23 Progress in International Reading Literacy Study (International Association for the Evaluation of Educational Achievement).

24 Norwegian Directorate for Education and Training, *ICCS 2022 – report on citizenship*.

25 Meld. St. 34 (2023–2024) *En mer praktisk skole [a more practical school]*.

and being heard. A safe school environment, where pupils and teachers alike feel free to disagree, ensures that diverse attitudes and perspectives can be expressed.

The new Education Act makes it clear that school rules must include provisions on how school democracy is organised, as well as pupils' rights and responsibilities. It is now established in law that schools must ensure that all pupils are able to express themselves, encourage participation in school democracy, and support pupils in doing so. Schools must also work actively to create a safe environment where every pupil can express themselves and take part in school democracy in different ways, not only through pupil representatives in formal bodies. They must ensure that all pupils have the opportunity to participate, regardless of age, gender, ethnicity, functional ability or socioeconomic background.

The foundations for active social engagement are laid in preschool settings. The framework plan for kindergartens states that by participating in the kindergarten community, children should have the opportunity to develop an

understanding of society and the world they belong to. Kindergartens must promote democracy and be an inclusive community where everyone can express themselves, be heard and take part. All children should be able to experience democratic participation by contributing to and influencing the kindergarten's activities, regardless of their communication abilities or language skills. Children in Sámi kindergartens must have the opportunity to participate and contribute in their own language. Kindergartens must recognise and value children's different forms of communication and language, including sign language. Diverse opinions and perspectives should be welcomed and used as a basis for developing the kindergarten as a democratic community. Kindergartens must help children develop an understanding of, and support for, the democratic values and norms that underpin society today. The child's freedom of thought must be respected.

The Norwegian Government will

- strengthen civic education by supporting schools in implementing subject syllabuses and the cross-subject theme of democracy and citizenship
- strengthen democratic resilience by helping schools foster safe, inclusive environments where all pupils feel able to speak their minds and take part in school democracy
- improve pupils' literacy

Priority areas and measures

- evaluate the LK20/LK20S national curriculum
- follow up the reading engagement strategy (*Sammen om lesing*) and the national reading programme (*Tid for lesing*)
- strengthen Dembra's efforts to combat racism, group-based hostility and undemocratic attitudes

2.1.7 Research and higher education

Modern society relies on research to inform the technologies we use, health services and other research-based professions, and, crucially, to provide a foundation for public debate. We have become accustomed to research and evidence-based knowledge, and we may generally take it for granted. However, in times of crisis, we are reminded of just how important research is. Whether facing war, terrorism, social exclusion, pandemics and other health threats, or a global climate crisis, we turn to research to understand events and identify potential courses of action. Norway's public investment in research and development (R&D) ranks among the highest in the world.

For research to contribute to open and enlightened public discourse, it must be accessible and used as a basis for evidence-based discussion, the exchange of views, and policy development (see Report to the Storting no. 14 (2024–2025) *Reliable Knowledge in an Uncertain World*, Chapter 7). Authorities must facilitate access to high-quality evidence-based knowledge for the public and organisations/enterprises throughout Norway. Quality implies that research is innovative, relevant and grounded in recognised methods and data. Open access to research findings and research data is a prerequisite for an effective research system and is necessary to apply knowledge more rapidly. In Report to the Storting no. 5 (2022–2023) *Long-term Plan for Research and Higher Education 2023–2032*, the Government set a goal to achieve

The Research Council of Norway is both a funding channel and a quality-assurance mechanism for research projects, and plays a key strategic role in safeguarding national priorities, contributing to the development of robust research environments, and nurturing early-career researchers. The Research Council also serves as an advisory body on research policy for the authorities.

Statistics Norway collects and organises an extensive range of data from administrative registers, censuses and sample surveys for the production and dissemination of official statistics. Its data are highly valuable to researchers, and the Statistics Act stipulates that one of its responsibilities is to provide statistics for research purposes, within the frameworks of, for example, privacy protection and statistical confidentiality.

The National Research Ethics Committees are Norway's leading independent agencies for research ethics. Through guidance, preventive work, administrative decisions, and investigations of individual cases, the committees help ensure that research commissioned by both the public and private sector adheres to recognised ethical standards. The committees and the Investigation Committee are appointed by the Ministry of Education and Research and are autonomous.

open access to all publicly funded Norwegian scientific articles by 2024. This report also establishes that research data from publicly funded research should, as a general rule, be regarded as public information. Currently, over 80 per cent of publicly funded research articles have open access. The establishment of the Norwegian Research Information Repository (NVA), which collects published works and other research output in a single open access platform, is nearing completion. In Report to the Storting no. 14 (2024–2025), the Government announced that it will 'ensure that the national support scheme for Norwegian language journals in the humanities and social sciences is expanded to secure high-quality diamond open access journals in the Norwegian language and to promote Norwegian as an academic language in more subject areas' (p. 94).

How research is used, for example in political debates, is not something the authorities can regulate. Nevertheless, the Norwegian Government will robustly defend and promote academic values. The statutory framework for academic freedom of expression and for dissemination activities and responsibilities has been strengthened in the new Universities and University Colleges Act, which entered into force on 1 August 2024. The Act states that institutions must promote and protect academic freedom for students and staff, and ensure transparency in relation to R&D results. Research institutes

are also required to ensure that academic freedom applies to all publicly funded research.²⁶

The research-based skills and knowledge that students acquire as part of their higher education have, over time, had a major impact on public discourse in Norway. In particular, training in research methods and academic ideals such as the systematic testing of hypotheses, critical assessment of sources, and debate based on reasoned argument and respect for empirical knowledge, has helped develop what the Norwegian Constitution refers to as 'enlightened' public discourse. Surveys in recent years suggest challenges in the climate of expression experienced by young people, with nearly 40 per cent reporting that they do not dare to express their opinions.²⁷ In light of these findings, higher education institutions have an important task ahead in strengthening the understanding and dissemination of academic ideals, and in facilitating a climate of expression that provides ample space for reasoned disagreement and debate. Student democracy at universities and university colleges has an important role to play in this regard.

The Expert Group for Academic Freedom of Expression notes in NOU 2022: 2 *Academic Freedom of Expression* that it cannot be assumed that students, staff or leaders in higher education possess a fundamental understanding of what academic freedom of expression entails

26 [Retningslinjer for statlig grunnbevilgning til forskningsinstutter og forskningskonsorter \[guidelines for core government funding for research institutes and research consortia\]](#).

27 Opinion: UNG2023.

(p. 85). In the *Long-term Plan for Research and Higher Education 2023–2032* (p. 90), the Government will ask

'all universities, university colleges, hospital trusts, regional health authorities and research institutes that receive basic funding from the state to safeguard their employees' academic freedom of expression, provide the necessary training in what this freedom entails, and ensure that academic quality norms are upheld through peer reviews and lively debate in the academic communities'.

To assess whether this is being implemented in the sector, the Norwegian Government is considering examining how academic freedom of expression is integrated into researcher training and how the leadership in higher education institutions and research institutes facilitates forums for sharing knowledge and experiences in the topic.

The Norwegian Government will

- ensure that everyone has access to evidence-based knowledge, including by maintaining a high investment level in research and higher education, and by ensuring that publicly funded Norwegian scientific articles are openly accessible
- support open and enlightened public discourse by upholding the scientific principles of verifiability, methodological transparency and systematic, rigorous analysis
- defend and promote academic values and academic freedom

Priority areas and measures

- follow up the *Long-term Plan for Research and Higher Education 2023–2032*
- follow up Report to the Storting no. 14 (2024–2025) *Reliable Knowledge in an Uncertain World*

2.1.8 Civil society

Civil society and the third sector are fundamental to fostering trust and a sense of belonging. Participation in voluntary organisations creates spaces for children and adults across generations and backgrounds, contributing to the development of social skills, friendships, networks and a sense of achievement. The activities of voluntary organisations, and their presence in people's lives, make them key drivers of democracy, public discourse and debate. Civic engagement therefore fulfils a vital democratic function, acting as a link between citizens and the political system. Accessible spaces for children and young people, such as youth clubs and other leisure activities, provide important low-threshold arenas that foster inclusion and a sense of belonging.

The Norwegian Government's overarching objective is that everyone who wishes to do so can participate in voluntary organisations and activities. Taking part in leisure activities has major benefits both for individuals and for society as a whole. In Norway, 69 per cent of the population are members of at least one organisation involved in voluntary work. Robust framework conditions are crucial to supporting a diverse third sector. This includes predictable funding, straightforward regulations and schemes, and access to suitable premises. Strong framework conditions ensure that civil society can continue to play a key role in promoting democratic values and freedom of expression, by providing spaces where people of all ages and backgrounds can come together.

The main policy instruments in this area are the general and universal initiatives that facilitate predictable funding and operational flexibility in the third sector. In 2024, more than NOK 2.7 billion was distributed in support to a total of 24,346 associations and organisations. There are also a range of other government grant schemes for voluntary organisations: two of the most significant are *Frifond Organisasjon* (free fund for voluntary organisations) and *Nasjonal grunnstøtte til frivillige organisasjoner* (national core funding for voluntary organisations). These help fund national organisations engaged in voluntary work for children and young people. Both schemes aim to secure the operations of children's and youth organisations, encourage participation and engagement, and promote greater local activity. Organisations receiving core funding must meet strict inclusion requirements, including measures to prevent racism and discrimination. This helps facilitate civic engagement that is open and accessible, including to minorities and marginalised groups.

Faith and belief communities are an important part of civil society and the third sector in Norway. Umbrella organisations for these communities play a key role in educating the public about different religions and beliefs, both within the communities themselves and more broadly across civil society. The Ministry of Children and Families provides operational funding to the Council of Religious and Life Stance Communities (STL), the Christian Council of Norway and the Muslim Dialogue Network, all umbrella organisations. Dialogue and cooperation across faiths and beliefs are essential in a diverse society. In

Norway, faith and belief communities have been driving this dialogue, actively promoting knowledge and respect across religions and beliefs, and helping to resolve societal challenges.

Political parties also play an important role in civil society, particularly in relation to debate

and highlighting differing political views. Through their national and local presence, parties have a broad reach and provide opportunities for citizens to take part in their communities. The youth branches of political parties are important arenas for engaging young people in civic life.

The Norwegian Government will

- stimulate participation and engagement by ensuring robust framework conditions for voluntary activity
- give everyone who wishes to do so the opportunity to take part in voluntary organisations and activities

Priority areas and measures

- simplify government grant schemes for voluntary organisations (new guidance 2025)
- enhance civil society actors' expertise in preventing radicalisation and extremism (see Report to the Storting no. 13 (2024–2025))
- follow up the Government's cultural volunteering strategy 2023–2025 (*Rom for deltagelse*)
- follow up the action plan for equal opportunities to participate in cultural, sports and outdoor activities 2024–2026 (*Alle inkludert! – Handlingsplan for like muligheter til å delta i kultur-, idretts- og friluftslivsaktiviteter*)

2.1.9 The workplace

Freedom of expression is a fundamental human right. Employees are therefore entitled to the same protections that apply outside the workplace. Everyone has the right to speak out on matters relating to their own workplace and to participate in public debate on issues connected to their organisation or professional field, even if the organisation might be adversely affected.

Several studies and case reports, along with feedback received by the Norwegian Commission for Freedom of Expression, indicate that many employees and professionals self-censor or refrain entirely from sharing information and opinions relating to their work. This trend has worsened in recent years. It is important for open and enlightened public discourse that those with specific insight into relevant issues through their employment contribute to public debate. If this space for expression is not used, society loses important information, professionally grounded perspectives and valuable experience.

Employees' freedom of expression includes the right to protected disclosure, i.e. reporting wrongdoing without retaliation. Protected disclosure in the workplace has been the subject of repeated debate and review in recent years, including by Norway's Protected Disclosure Committee in 2018.²⁸ Following this, a range of measures were introduced in Norway to strengthen the protection of employees who report wrongdoing, known as whistleblowers. The Norwegian Commission for Freedom of Expression highlighted the importance of recognising and making use of the channels available for raising critical issues, without labelling

this as protected disclosure. Defining protected disclosure more broadly than the law intends risks diluting the protected disclosure mechanism and blurring the boundaries of normal freedom of expression in the workplace. Misunderstandings around the term can give the impression that employees are not permitted to criticise their workplace unless it constitutes formal protected disclosure. Employers and employees alike should be trained in handling criticism, and managers should set a good example by recognising that constructive criticism is valuable, as it can help improve the organisation.

To reinforce freedom of expression in the workplace, systematic efforts are needed in relation to the culture of expression. This is the responsibility of employees and particularly employers. The tripartite cooperation between the social partners: the Government, employee organisations and employer organisations, has been a key driver in the development of labour relations in Norway. This partnership is also important for improving understanding of the value of freedom of expression and encouraging expression in the workplace.

The Norwegian Confederation of Trade Unions (LO) and the Confederation of Norwegian Enterprise (NHO) have established a joint initiative on freedom of expression in the workplace and appointed a steering group. In 2024, they held a joint consultation conference on this topic. The aim is to draw up common guidelines and a training programme for union representatives and companies on facilitating a healthy culture of expression in the workplace. The Norwegian Human Rights Institution (NIM) is assisting the parties in this work.

28 NOU 2018: 6 *Varsling – verdier og vern [disclosure – values and protection]*.

The Norwegian Government will

- promote a healthy culture of expression in the workplace
- improve understanding of the value of freedom of expression and encourage its practice in workplaces through the tripartite cooperation

Priority areas and measures

- discuss freedom of expression in the workplace and the social partner cooperation on this issue in the Council on Labour and Pension Policy (ALPR)
- initiate an R&D project to evaluate the protected disclosure rules

2.1.10 Universal design

A public sphere that facilitates broad participation, enabling a wide range of voices to speak out when they consider it necessary, is both inclusive and universally accessible. Universal design helps ensure that everyone has equal opportunities to develop, realise their potential and participate in society. Universally designed solutions allow people to access and take part in the activities they choose, such as employment or leisure activities, regardless of their life stage or functional ability. The absence of universal design can impede access to platforms for expression and limit opportunities for participation in public discourse.²⁹ The Norwegian Commission for Freedom of Expression observed that 'everyone falls short to some degree when confronted with the public sphere'. The aim of universal design must therefore be an inclusive approach to freedom of expression for *all*, not only for those with disabilities. A public sphere with low barriers to participation and a high level of accessibility benefits everyone.

The Government's action plan for universal design (*Bærekraft og like muligheter – et universelt utformet Norge 2021–2025*) seeks to support a sustainable and fair society in which everyone can participate. It takes a broad approach and includes measures relating to public planning and land use planning, ICT, language and democratic infrastructure.

This is the fourth in a series of action plans on universal design. Since the launch of the first plan in 2004, both policy and practice have advanced considerably. Universal design is now recognised as a desirable and necessary societal value, enhancing everyday life through simpler, safer and more comfortable surroundings. This, in turn, helps promote a socially, economically and environmentally sustainable society.

Data from the Norwegian Directorate for Higher Education and Skills indicate that around 600,000 Norwegians have such a low level of digital literacy that they likely face significant challenges in using digital services.³⁰ Age is the most significant factor, followed by lack of attachment to the labour market or education. People with disabilities also use the Internet less frequently than others.

Digital exclusion is a threat to democracy, and universal design is a key part of the solution. The Government is committed to building a society in which everyone can participate. Achieving this in practice requires removing digital barriers that prevent participation. The national digitalisation strategy *Digital Norway of the Future 2024–2030* emphasises that in order to ensure access for all, digital services must be universally designed and adhere to the principles of plain language.

29 Norwegian Human Rights Institution, *Funksjonshemmedes ytringsfrihet [freedom of expression for people with disabilities]* (2022).

30 *Befolkingens digitale kompetanse og deltagelse [the population's digital literacy and participation]*, Norwegian Directorate for Higher Education and Skills.

The Norwegian Government will

- promote universal design in all areas of society to ensure that everyone can exercise their freedom of expression and participate in society
- enhance digital literacy among groups affected by digital barriers and exclusion, enabling everyone to engage in public discourse
- strengthen the efforts in usability, plain language and universal design in public digital services

Priority areas and measures

- incorporate the UN Convention on the Rights of Persons with Disabilities (CRPD) into the Human Rights Act
- revise the Government's strategy for the equality of persons with disabilities (*Et samfunn for alle 2020–2030*)
- follow up the action plan for universal design (*Bærekraft og like muligheter – et universelt utformet Norge 2021–2025*), with an extended period of effect to 2026
- follow up the action plan for greater inclusion in a digital society (*Handlingsplan for auka inkludering i eit digitalt samfunn 2023–2026*)
- implement the EU Web Accessibility Directive (WAD) on the accessibility of public sector bodies' websites and apps



2.2 Culture of expression



2.2.1 Introduction

The Norwegian Commission for Freedom of Expression defines *culture of expression* as 'the overall state we collectively create through what we express and how we express it'. Culture is generally understood as a set of shared attitudes, values, norms, beliefs, traditions, institutions, customs and practices. The culture of expression in a society is shaped through human interaction and therefore evolves over time. A healthy culture of expression cannot simply be mandated by political authorities; it is a shared responsibility in which the public sector, the business sector, civil society and individuals all have a role to play. The Government can, however, help support this, and in practice does a great deal to facilitate a healthy culture of expression.

Tolerance, diversity and openness are fundamental to a democratic society. A healthy culture of expression is not created in a public sphere free of disagreement or friction, but in one that enables non-violent dissent and conflict while providing space for everyone.

2.2.2 Tolerance and diversity

In a society where freedom of expression is well safeguarded, we will inevitably encounter attitudes and viewpoints with which we disagree, or which we even consider objectionable or reprehensible. We can also be exposed to values and practices that are unfamiliar to us. These encounters strengthen our capacity for tolerance.

Tolerance of the expressions and opinions of others is a prerequisite for the free formation of opinion, for our ability to absorb new information, listen to new arguments, take positions on political or other societal issues, and, where necessary, change our views. As society becomes more diverse, the more likely we are to encounter unwelcome expressions, and the more crucial this function of freedom of expression becomes.

In Article 100 of the Norwegian Constitution, freedom of expression is grounded in three principles: 'the seeking of truth, the promotion of democracy and the individual's freedom to form opinions'. One of the recommendations of the Norwegian Commission for Freedom of Expression was to review Article 100 and, in that context, consider whether the principles of tolerance and diversity should be incorporated as an additional basis for freedom of

expression. The Commission found that tolerance and diversity complement the traditional, discourse-based rationale for freedom of expression in the Constitution, by better reflecting its actual role in contemporary society.

The principle of tolerance and diversity is also emphasised by the European Court of Human Rights (ECtHR). Although not stated explicitly in Article 10 of the European Convention on Human Rights, it is interpreted as inherent in the understanding of democracy. The Norwegian Government holds that tolerance and diversity can likewise be regarded as integral to Norway's constitutional protections as prerequisites for democracy. These principles could therefore serve both as a justification for freedom of expression and as a justification for restrictions on it.

2.2.3 Culture of disagreement

The Norwegian Commission for Freedom of Expression noted that the principle of tolerance and diversity embodies the ideal of a culture of disagreement. The concept highlights that democracy is not defined by a fixed set of values, but is instead a system for the peaceful management of disagreement. It is not founded on consensus, but on a willingness to engage in dialogue and cooperation. In a healthy culture of disagreement, individuals are able to engage constructively with differences and conflicting perspectives.

2.2.3.1 Expressions that 'offend, shock or disturb'

A fundamental principle of freedom of expression is that it also protects information and ideas that 'offend, shock and disturb', as affirmed in various judgements by the ECtHR.³¹

Democracy depends on an open public sphere with a high tolerance for differing views, where as many people as possible can engage with issues they consider important and express themselves when necessary. Public discourse must also make room for input that some may find offensive, objectionable or harmful. Disagreement and conflict can be uncomfortable, but they are an unavoidable part of democratic debate. While we aim to maintain an inclusive space for expression, we must also learn to navigate challenging and provocative expressions. This is also an expression of the principle of tolerance and one of the inherent 'costs' of freedom of expression and open discussion.

Being met with counterarguments and criticism, or even satire, ridicule or mockery, does not mean that your freedom of expression is being restricted. As the Norwegian Commission for Freedom of Expression stated: 'Protesting against racist statements or dehumanising rhetoric does not constitute an attempt to restrict freedom of expression'.

Cancel culture and deplatforming are phenomena that frequently arise in discussions about freedom of expression and the culture of expression. Some interpret them as manifestations

³¹ *Case of Handyside vs the United Kingdom* (EMD-1972-5493).

of a culture war between the 'woke' movement and liberal values. Others view them as a legitimate reckoning with a past marked by racism, intolerance and outdated attitudes, while some take a more nuanced position. The Norwegian Commission for Freedom of Expression found no evidence to suggest that these are widespread problems in Norway today.

Regardless of perspective, most would agree that society can legitimately oppose its most extreme voices, even when their statements are entirely lawful. What is considered unacceptable depends on individual attitudes, which are influenced by experience, knowledge, age, background and other factors. Societal norms regarding what is acceptable also evolve over time. It is therefore important to maintain an ongoing dialogue about the boundaries of the space for expression and the type of culture of expression we wish to foster. The Norwegian Commission for Freedom of Expression highlights that views on whether someone should be 'cancelled', whether a book should be published, or whether an article should be printed, often trigger lively debate and strong reactions. This does not necessarily constitute a threat to freedom of expression; on the contrary, it can be a sign that the space for expression is functioning as intended.

2.2.3.2 Violence or threats as a response to information or ideas

Even open and tolerant societies have absolute limits. One such limit is the use of violence, or threats of violence, in response to expression.

While these matters are, of course, normally addressed under criminal law, they also raise important questions about the culture of expression – about how we, as individuals and as a society, face, respond to and discuss violent reactions to expression.

Violence and threats cause fear, which is often precisely their intention. Fear of violence can suppress freedom of expression, where certain topics are avoided, particular groups or figures of authority are shielded from scrutiny and criticism, or minorities refrain from engaging in public discourse. These consequences are extremely detrimental to openness and trust within Norwegian society and, more broadly, can undermine confidence in the public sphere as a whole.

In a healthy culture of expression, we respond to ideas and opinions with our own information and arguments. This is a prerequisite for cultivating tolerance and understanding of one another's viewpoints and for reaching agreement on solutions. In practice, this means that violence and threats can never be an acceptable form of response and should be roundly and unanimously condemned. We should never excuse, condone or express understanding for violent reactions in response to expression, and a violent reaction should never be regarded as the responsibility of the person being targeted, no matter how provocative their remarks may have been.

Under Section 271 of the Penal Code, a physical assault – the least serious violent offence under Chapter 25 – may be exempt from punishment if it is committed in response to an ‘especially provocative statement’. The wording makes clear that this is a narrow exception. First, the comments must be provocative. Second, the provocation must exceed a certain threshold, as indicated by ‘especially’. In any case, the provision does not imply acceptance of, or support for, the use of violence in response to expression; it merely means that, in very special cases, such acts will not result in criminal sanctions.

Furthermore, it means that we must continue to distinguish between statements and actions – between words and violence. While there is no doubt that words can inspire actions, and that they can have harmful effects on individuals, groups or society as a whole, the distinction remains fundamental. Blurring the line between thought, words and actions undermines freedom of thought and expression. Upholding this distinction is therefore an important prerequisite for a free and open society.

2.2.4 An inclusive space for expression

A relatively small proportion of the population actively participate in the public sphere. There may be many reasons for this, and it is not necessarily problematic, provided that society as a whole maintains a generally high level of expression preparedness.

A variety of factors can act as barriers to participation in public discourse – some more significant than others. These may include a lack of financial, cultural or social resources, or insufficient access and support. Barriers may

also arise from a fear of encountering unpleasant comments, harassment, abuse or ridicule. Some individuals may find the tone or style of debate uncomfortable or alien, even if they do not fear being personally attacked. Another barrier may be concern about being negatively labelled or being associated with groups or ideologies that do not align with personal values. The desire to avoid offending others can also inhibit participation, particularly in discussions on sensitive, emotive or polarising topics.

The Norwegian Commission for Freedom of Expression highlighted, in particular, the challenges that minority groups might face when speaking publicly. Others may be vulnerable due to their occupation, their role or status, or a position of trust they hold. Some individuals are vulnerable for multiple reasons, such as ‘double minorities’ (people who, for example, are both a member of the LGBTQ+ community and from a multicultural background). Other examples include young people or members of minority groups who hold political office or work as journalists or artists. Excluding such voices and perspectives from public debate affects not only the groups concerned but also

has wider implications for society and democratic processes.

The term 'minority stress' refers to the high levels of stress that minorities can experience when exposed to stigmatisation in certain situations or relationships. International research shows that the adverse effects of minority stress affect not only individuals, for example in the form of poorer mental and physical health, but can also have broader societal implications. Minority stress can prevent minority groups from participating fully and meaningfully in society. Consequently, society risks losing the benefits of the contributions these groups can make.³²

The following sections focus on how the Norwegian Government facilitates an inclusive space for expression through positive measures. Prohibitive measures and other measures targeting harmful speech are addressed in Section 2.4.

2.2.4.1 Vulnerable groups

Some groups are particularly vulnerable to exclusion from public discourse, including young people and various minority groups. One reason these groups merit special attention is that they have not chosen, or had the opportunity to influence, their role or position.

Young people

Access to the Internet and social media has given today's young people completely new opportunities to obtain information, express

themselves and participate in public discourse. However, aspects of the Internet and social media can also act as barriers to young people's participation.

In the UNG2023 report by Opinion, 37 per cent of young respondents stated that they do not dare voice their opinions. The Youth Freedom of Expression Council, established by PEN Norway and the Fritt Ord Foundation in 2020, observed that many young people find the prospect of expressing themselves daunting. They may fear that they lack the knowledge or experience needed to take part in public discourse, or feel that those with opposing views dismiss them because of their age. The Council also noted that hate speech and harassment are among the factors that discourage young people from joining the public debate.

The children and media survey conducted by the NMA shows that 53 per cent of 13–18-year-olds have encountered hate messages online in the past year.³³ Many are also concerned that their comments may be misunderstood if taken out of context and circulated on social media. The Council further noted that pupils often learn about the theory of freedom of expression at school, but far less about what it means in practice.³⁴ The Norwegian Commission for Freedom of Expression identified an urgent need for young people to develop skills in debate, online conduct and the practical exercise of freedom of expression.

32 SINTEF, *Experiences with minority stress* (2024).

33 Norwegian Media Authority, *Barn og medier 2024 [children and media 2024]*.

34 Youth Freedom of Expression Council (2021). *Hvordan står det til med ytringsfriheten til ungdom og unge voksne i Norge? [what is the status of freedom of expression among young people in Norway?]* PEN Norway and the Fritt Ord Foundation.

Outside of the school setting, a wide range of actors are involved in equipping young people with the skills, practical experience and confidence needed to exercise their freedom of expression. These include Dembra (Democratic Preparedness Against Antisemitism and Racism), the Fritt Ord Foundation, the Norwegian Human Rights Institution (NIM), the Norwegian Children and Youth Council (LNU), the Norwegian Media Authority (NMA), PEN Norway, the No Hate Speech Movement and Tenk. In 2025, the World Expression Forum (WEXFO) in Lillehammer will receive a grant of NOK 1 million, which will help create spaces where young people can meet, learn about freedom of expression and discuss and express their views.

It is important to foster a culture of expression in which young people have the opportunity to express themselves and participate in public debate. In a democracy, all voices matter, but it is especially important to support the voices of young people. They are the ones who will shape society in the future and who will live with the decisions made today. Young people need to understand the implications of freedom of expression for democracy and have the necessary confidence and practical tools to engage actively in society. Schools play a key role in this regard.

Minorities

The first Norwegian Commission for Freedom of Expression (NOU 1999: 27) noted that 'the conditions and opportunities available to minorities to participate in "open and informed conversation" can be seen as a test case for the status of freedom of expression in society'.

Minority groups can be particularly vulnerable in several respects. Research suggests that they

are more likely to experience harassment and abuse than the majority population,³⁵ and consequently, are more likely to refrain from participating in public discourse.³⁶ Those with more than one minority characteristic, for example, a member of the LGBTQ+ community with a multicultural background, are significantly more at risk than those with only one.

There are also factors in addition to harassment and abuse that can act as barriers to social engagement. Members of a minority group may refrain from engaging because they fear being reduced to a representative of their group. People with disabilities may face physical barriers to accessing information, for example due to poorly adapted facilities or an absence of universal design. (See also Section 2.1.10.)

In recent years, a series of action plans, strategies and parliamentary reports have tried to strengthen efforts to combat various forms of discrimination and to promote democratic participation among different population groups. These measures include research and

35 [Statistics and analysis | Bufdir](#)

36 Midtbøen, A.H. (ed.), *Offentlighetens grenser: hovedfunn fra prosjektet Status for ytringsfriheten i Norge 2015–2017* [the limits of the public sphere: key findings from the 'Status of Freedom of Expression in Norway' project] (2017).

In 2023, the Norwegian Government introduced an action plan for gender and sexuality diversity (2023–2026). The plan aims to improve quality of life for LGBTQ+ individuals, safeguard their rights and foster greater acceptance of gender and sexual diversity. This initiative is partly a response to the prejudice, discrimination and hate crimes experienced by many in the LGBTQ+ community.

In the same year, the Government also launched the updated *Action Plan to Combat Racism and Discrimination 2024–2027*. This overarching action plan addresses racism and discrimination targeting all vulnerable groups, with a particular focus on the workplace and the experiences of young people.

The Government's video game strategy 2024–2026 (*Tid for spill*) was launched in December 2023. The strategy highlights challenges such as harassment, abuse and bullying within parts of the gaming culture. It also announced the establishment of a national centre of expertise for gaming culture under the Norwegian Film Institute, in collaboration with Arts for Young Audiences Norway and the NMA.

In 2024, the Government presented Report to the Storting no. 7 (2024–2025) *Sexual Harassment*. This report provides the first comprehensive overview of the scope of sexual harassment across different areas and establishes the framework for ongoing efforts to combat it.

In the same year, the Government also launched a new action plan to combat antisemitism and another new one aimed at Islamophobia, representing the third and second action plans in these areas, respectively. Furthermore, in 2025 the Government presented its first action plan to combat harassment and discrimination of the Sámi. All three plans cover the period 2025–2030. The latter addresses recommendations from the Norwegian Commission for Freedom of Expression, the Norwegian Truth and Reconciliation Commission and the Sámi Parliament's own action plan to combat hate towards the Sámi. The three most recent plans share the same principal focus areas: promoting dialogue and a well-functioning democracy, building knowledge and competence, and ensuring safety.

knowledge development, skills enhancement, dialogue, communication and conflict management, awareness-raising initiatives and efforts to improve the representation and recruitment of vulnerable groups.

The Norwegian Commission for Freedom of Expression called for more knowledge on how different minority groups engage with the

public sphere, how they exercise their freedom of expression, and their experiences in this context. Commissioned by the Norwegian Directorate for Children, Youth and Family Affairs (Bufdir), the Institute for Social Research is currently studying how AI can be used to identify and prevent abusive and harassing content on social media. The Norwegian Government will continue to provide funding for dialogue,

debate, collaboration and knowledge development in the field of religion and faith, as well as strengthen Dembra and the Peace and Human Rights Centres.

The Norwegian Commission for Freedom of Expression also recommended supporting organisations that actively work to counter hate speech in civil society. The Government has followed this recommendation by increasing support for the No Hate Speech Movement and grant funding for measures to combat racism, discrimination and hate speech, administered by Bufdir. The Government also aims to improve the police's expertise in hate crime.

Gender differences

Gender can also impact on the risk of being excluded from public discourse. According to the Norwegian Commission for Freedom of Expression, studies show no evidence that women generally experience more harassment or abuse than men. However, harassment directed at women is more often gender-based.³⁷ In practice, this means that men are more frequently targeted *for their opinions*, while women are more often subjected to online abuse because of *who they are*. There are also notable differences in the impact of online harassment for women and men. Women report more frequently that they have felt fear, or have withdrawn or refrained

from expressing their opinions.³⁸ A 2022 survey examining young people's experiences of hate speech online found that gaming is a digital space in which girls in particular are exposed to harassment.³⁹

2.2.4.2 Vulnerable roles

Certain groups can be particularly vulnerable due to the positions or roles they hold in society, e.g. elected representatives, journalists, artists and researchers. While these positions are generally held voluntarily and can be relinquished, they nonetheless serve important democratic functions. Ensuring a solid basis for recruitment and preventing people from leaving these roles are therefore key priorities.

Elected representatives

Multiple studies show that politicians at both the local and national level are often subjected to harassment and threats. A 2023 survey conducted by Ipsos on behalf of the Norwegian Association of Local and Regional Authorities (KS) found that 40 per cent of elected representatives in local and county authorities had experienced hate speech,⁴⁰ threats or both.⁴¹ The problem also appears to have worsened as social media has made it easier to directly contact politicians or to post messages and comments to a wider audience. This may discourage

37 NOU 2022: 9 *En åpen og opplyst samtale [open and enlightened debate]*, Section 5.4.8.

38 Fladmoe, A. and Nadim, M., Likestillingsskepsis og seksualiserende og truende innhold på nett [scepticism towards gender equality and sexualised and threatening online content] (2025).

39 Norwegian Media Authority, *Unges erfaringer med hatefulle ytringer [young people's experiences with hate speech]* (2022).

40 The survey did not use the definition in the Penal Code (Section 5185); it applied the broader interpretation of the term in the Equality and Anti-Discrimination Ombud.

41 Norwegian Association of Local and Regional Authorities, *Hatytringer, trusler og desinformasjon mot folkevalgte [hate speech, threats and disinformation aimed at elected representatives]* (2023).

politicians and political candidates from participating in public debate or from taking on roles and positions that are vital to a well-functioning democracy.

The Ministry of Local Government and Regional Development will update its guidance on preventing and responding to hate speech, harassment and threats aimed at politicians and political candidates. The revised guidance will include more detailed information on how politicians from minority backgrounds may be particularly at risk. As part of the follow-up of the action plan to combat harassment and discrimination of the Sámi, the Norwegian Police University College will conduct a study on harassment and threats directed at members of the Sámi Parliament.

Journalists

The Norwegian Commission for Freedom of Expression concluded that 'nowhere in the world is it safer or freer to be a journalist than in Norway'. Nevertheless, the Commission also documented instances of violence and threats against journalists in Norway, noting that those with minority backgrounds are particularly at risk. Norway's position was confirmed in the annual Reporters Without Borders' World Press Freedom Index, where it had top ranking for the ninth consecutive year in 2025.⁴² Reporters Without Borders made the following observation:

Norway's legal framework safeguarding freedom of the press is robust. The media market is vibrant, featuring a strong public service

broadcaster and a diversified private sector with publishing companies guaranteeing extensive editorial independence.

However, not all journalists enjoy a safe working environment free from threats and harassment. The 2025 World Press Freedom Index notes that journalists in Norway 'generally work in a safe environment', but also that 'threats against journalists are commonplace'. Studies further indicate that journalists from minority backgrounds, as well as those reporting on specific or highly contentious issues, are particularly vulnerable to threats, harassment and hate speech. Women report receiving unwanted sexualised advances more frequently than men.⁴³

Working in an unsafe environment can lead to self-censorship, which in turn can reduce media diversity and weaken public discourse. It is therefore important to closely monitor the situation of journalists in Norway, in line with the recommendations of the Council of Europe and its campaign for journalist safety. To this end, the Norwegian Government has invited press organisations to discuss how the authorities and the media can work together to ensure safe working conditions for all journalists in Norway.

Artists

In 2020, the Fritt Ord Foundation conducted a survey examining artists' perceptions of the conditions for freedom of expression.⁴⁴ The findings indicate that, overall, freedom of expression is not under pressure. However,

42 Reporters Without Borders, [Index](#).

43 Respons, [Medievaner og holdninger \[media habits and attitudes\]](#) (2021).

44 Slaatta, T. and Okstad, H.M., [Kunstnere vurderer ytringsfrihet – 2020 \[artists evaluate freedom of expression – 2020\]](#).

41 per cent of respondents felt that it had weakened slightly or substantially since the previous survey in 2014. The primary reasons cited were the level of conflict in public discourse, threats and hateful content online, and the propagation of lies and rumours on social media.

It is therefore important to monitor developments in this area closely. If an increasing number of artists feel unsafe, this may lead to self-censorship, which, if widespread, could undermine the role of art in society. The Ministry of Culture and Equality will therefore initiate a study into artists' space for expression.

Researchers

Around half of researchers at universities, colleges and research institutes engage in public communication through mass media or social media.⁴⁵ However, many report a challenging culture of expression within academia.⁴⁶ Researchers working on immigration, gender and equality, or climate issues are particularly active in public engagement, but they are also more likely than other researchers to exercise

restraint in how they communicate their work publicly.⁴⁷ This group is also subjected to more unpleasant comments and threats, which mostly stem from fellow researchers and colleagues.⁴⁸

Universities and colleges have a duty to facilitate participation in public debate for staff and students, and to uphold and protect academic freedom of expression.⁴⁹ Guidelines for government funding of research institutes similarly include the principle of academic freedom and the right to make research findings publicly available.⁵⁰

Although academic freedom of expression is well protected under Norwegian law, a poor climate of expression can lead to a reluctance in researchers to communicate their work publicly, which in turn can result in less enlightened public discourse. The Government will assess the potential for monitoring researchers' experiences of freedom of expression and the broader climate of expression, as part of the data collected on career development and working conditions in the higher education sector.

45 Mangset, M. et al., Forskerne og offentligheten – om ytringsfrihet i akademia [researchers and the public sphere – freedom of expression in academia].

46 NOU 2022: 2 *Academic freedom of expression*; Mangset, M., Midtbøen, A.H. and Thorbjørnsrud, K. (eds.). *Ytringsfrihet i en ny offentlighet: Grensene for debatt og rommet for kunnskap* [freedom of expression in a new public sphere: the boundaries of debate and the space for knowledge]. Universitetsforlaget, 2022.

47 Mangset, M. et al., Forskerne og offentligheten – om ytringsfrihet i akademia [researchers and the public sphere – freedom of expression in academia].

48 Mangset, M. et al., Forskerne og offentligheten – om ytringsfrihet i akademia [researchers and the public sphere – freedom of expression in academia].

49 Act relating to universities and university colleges (Universities and University Colleges Act), Sections 2-1 and 2-2.

50 Retningslinjer for statleg grunnløyning til forskingsinstitutt og forskingskonsern [guidelines for state funding for research institutes and research consortia], regjeringen.no.

The Norwegian Government will

- promote a culture of expression grounded in tolerance and diversity
- take a firm stance against violence and threats in response to expression
- foster an inclusive space for expression, including by prioritising vulnerable groups and roles in preventive efforts
- support young people in developing an understanding of freedom of expression and the value of debate and constructive disagreement

Priority areas and measures

- follow up various action plans in the field of equality and discrimination, including the action plan for gender and sexual diversity (*Regjeringens handlingsplan for kjønns- og seksualitetsmangfold (2023–2026)*), the action plan to combat racism and discrimination (*Handlingsplan mot rasisme og diskriminering – ny innsats 2024–2027*), the action plan to combat antisemitism (*Handlingsplan mot antisemittisme*), the action plan to combat Islamophobia (*Handlingsplan mot muslimfiendtlighet*) and the action plan to combat harassment and discrimination of the Sámi (*Handlingsplan mot hets og diskriminering av samer*) (The last three cover the period 2025–2030.)
- follow up the Government's video game strategy 2024–2026 (*Tid for spill*)
- follow up Report to the Storting no. 7 (2024–2025) *Sexual Harassment*
- update the guide on preventing and managing hate speech, harassment and threats aimed at politicians and political candidates
- conduct a study on harassment and threats directed at members of the Sámi Parliament
- conduct a study of artists' space for expression
- establish cooperation with press organisations to help ensure safe working conditions for all journalists in Norway
- assess the potential for monitoring researchers' experiences of freedom of expression and the broader climate of expression



2.3 Transparency, access and participation



2.3.1 Introduction

Transparency is a fundamental prerequisite for meaningful freedom of expression. Access to relevant and reliable information is needed to acquire knowledge, understand issues, form opinions and justify viewpoints. Transparency fosters trust and helps counteract mistrust, disinformation and conspiracy theories.

The principle that citizens should be informed about public authorities' activities is a cornerstone of democracy. The right of access to information increases public understanding of political issues and processes and encourages social engagement. It is also a prerequisite for the media functioning as a public watchdog and holding public authorities to account (see Section 2.1.3).

Open and enlightened public discourse also requires systems and forums for participation, allowing those affected to express their views, be heard and influence political decisions and processes. In a democracy, citizens are not merely passive recipients of information; they are active participants. Public participation provides political authorities with valuable insights, leads to better decision-making and fosters trust and mutual understanding between the public and elected representatives.

2.3.2 The right to information

The right to information relates to the principle of public access, under which individuals are entitled to access documents held by public authorities or to follow the proceedings of courts and democratically elected bodies. This right is enshrined in Article 100, fifth paragraph, of the Norwegian Constitution and is further regulated in a number of legislative acts, primarily the Freedom of Information Act, which regulates access to documents held by public authorities, and the procedural laws (the Dispute Act, Criminal Procedure Act and the Courts of Justice Act), which govern public access to documents in civil and criminal cases.

Other key legislation includes the Environmental Information Act, provisions in the Public Administration Act concerning parties' right of access, and rules on access to documents of the Norwegian Parliament (Storting) and other bodies not covered by the Freedom of Information Act. The Local Government Act provides for the right to attend meetings of elected municipal bodies, while the Health Authorities and Health Trusts Act provides for equivalent rules for board meetings of health authorities.

Norway's **elnnsyn** service is a globally unique online solution. It is used by public bodies subject to the Freedom of Information Act and is accessible by the general public. Government bodies, as well as certain local and county authorities, publish their official records of incoming and outgoing correspondence in elnnsyn. Meeting and committee data are also entered in the portal. Members of the public, journalists and media organisations can search the records anonymously and free of charge, and can request access to documents that have not been published.

Legislation also exists to ensure public access to information from private companies. The Environmental Information Act grants all citizens the right to information on matters affecting the environment, including the impact of environmental toxins in products, industrial emissions and land-use changes on people, the climate and the environment. Another example is the Transparency Act, which aims to promote respect for fundamental human rights and decent working conditions within companies. The reporting obligations under the Transparency Act aim to ensure that the public can access information on how large companies manage adverse impacts, including those affecting freedom of expression. The Norwegian Commission for Freedom of

Expression has recommended expanding the scope of the Transparency Act to cover large platform companies. The Ministry of Children and Families will assess the need for change during the forthcoming review of the legislation, including in light of the EU's 2024 Directive on Corporate Sustainability Due Diligence.

Editorial media play an important role in safeguarding transparency in society, both by upholding the public's right to information in practice and by facilitating communication between different segments of the public sphere. This includes communicating research and other specialist knowledge in ways that are accessible and comprehensible to non-experts.

2.3.3 Communication and public participation

A democratic society is dependent on everyone having equal rights and opportunities to take part in decision-making processes. A key element of this is that government bodies have an independent responsibility both to facilitate and to participate in open and enlightened public discourse.

The Norwegian Government's communication policy sets out its proactive information activities and its communication with the public. This policy is therefore directly linked to the duty to actively facilitate freedom of expression and

the right to information. The most recent guidelines for the communication policy, adopted on 16 October 2009, begin by citing Article 100, sixth paragraph, of the Norwegian Constitution. The first principle of good government communication is transparency: the government must be open, clear and accessible in its communication with citizens.

The communication policy sets out key objectives and principles for communication with citizens, the business sector, civil society organisations and other public bodies. Government entities must foster a culture of openness that ensures easy access for the media and the public.

In 2024, Norway's fifth action plan in the international **Open Government Partnership (OGP)** entered into force. The plan is binding and covers areas including public procurement, universal design and digital inclusion, access to criminal case documents, national archives, record-keeping and elnnsyn, as well as anti-corruption.

The Ministry of Digitalisation and Public Governance commissioned a study on transparency in the Norwegian public administration. The work drew on input from public authorities, research institutions, civil society and other key actors. Its purpose was to gain a clearer understanding of the current situation, identify challenges and knowledge gaps, and propose recommendations for the Government's future efforts within the OGP framework.

This study forms a basis for further discussion on the Government's efforts to strengthen transparency in the Norwegian public administration, and the recommendations will inform both Norway's continued participation in the OGP and the development of future action plans ([Open Government Partnership](#)).

Knowledge on policy development is shared through, for example, the publication of Official Norwegian Reports (NOUs), and by making these and other relevant reports available in the Norwegian Agency for Public and Financial Management's document repository, Kudos.⁵¹

The specialist expertise within the directorates makes them important contributors to enlightened public debate. The Norwegian Agency for Public and Financial Management (DFØ) notes that directorates must be able to communicate their expertise in a manner that strengthens the basis for public discourse.⁵² This also requires them to be transparent about the expert advice they give on policy development to government ministries.

Public participation is safeguarded in a variety of ways. At the most fundamental level, this occurs through elections for the Storting, the Sámi Parliament, local councils and county councils. The Instructions for Official Studies and Reports and the Public Administration Act set out provisions for involvement, publication and consultation. The Local Government Act facilitates public participation through measures such as rules on citizens' initiatives and provisions

allowing local authorities to hold advisory referendums. As the planning authority, local authorities must also ensure open, broad and accessible participation in the community under the Planning and Building Act. In addition, the Local Government Act requires local authorities to establish a senior citizens council, a council for persons with disabilities and a youth council. Children's right to be heard is closely linked to the obligation to give due weight to their best interests, as stipulated in Article 104 of the Norwegian Constitution and the UN Convention on the Rights of the Child. This right applies not only to individual children in specific cases, but also collectively to children as a group.

Established channels for public participation play a vital role in sustaining open and inclusive democratic processes. However, there is still a need to explore methods that can help involve groups that currently have limited opportunities to make their voices heard. We must examine new ways of engaging the public. Doing so can strengthen democratic participation, build trust and help counter polarisation in society. To this end, the Government established a national citizens' assembly in autumn 2024.⁵³

51 Norwegian Agency for Public and Financial Management, *Kudos – Kunnskapsdokumenter i offentlig sektor* [*Kudos – knowledge documents in the public sector*].

52 Norwegian Agency for Public and Financial Management, *Tydeligere, men fortsatt under press – en undersøkelse av utviklingen i direktoratenes faglige rolle* [*clearer, but still under pressure – a study of developments in the directorates' expert role*] (2024).

53 Ministry of Digitalisation and Public Governance, *National Citizens' Assembly on Sustainable Consumption*.

A citizens' assembly is a method of public participation where a representative sample of the population comes together to discuss and provide input on political or societal issues. Participants are given access to relevant information, and they engage in structured discussions and draw up recommendations that can inform decision-makers. This form of deliberative democracy strengthens freedom of expression by providing ordinary citizens with a genuine opportunity to share their opinions and be heard in political processes. In Norway, where freedom of expression is a fundamental right, citizens' assemblies help broaden the public sphere and ensure that more voices – including those who do not normally take part in public debate – are represented and play a role in societal development. The citizens' assembly is an internationally recognised method of public engagement, recommended by the OECD. Several local authorities (Bergen, Tromsø and Trondheim) have used various forms of citizens' assemblies to gather input on key political issues. Stavanger local authority has established a youth citizens' assembly and will convene a citizens' panel in 2025 for those aged 60 to 80.⁵⁴

2.3.4 Freedom of expression for public employees

In most areas, we are not experts. The exception is our own field of work, where we are qualified professionals who know what we are talking about. Failing to secure a robust basis for freedom of expression in the workplace can therefore result in society missing out on important information and well-founded considerations – insights that could contribute to the seeking of truth, the free formation of opinion and better decision-making, both in politics and more broadly in society.

The Norwegian Commission for Freedom of Expression is concerned by evidence from research and surveys showing that many employees self-censor or refrain from participating in public debate, and that this trend appears to be increasing. This is particularly the case among public employees. The Commission noted that employees appear to be uncertain about where the boundary lies between freedom of expression and the duty of loyalty to their employer. It concluded that this uncertainty fosters a culture of caution, leading employees who could offer valuable insights in public debate to hold back for fear of saying the wrong thing.

⁵⁴ Stavanger local authority, *Ungt borgerpanel [young citizens' assembly]*.

Public employees perform work of critical importance to society, in relation to fundamental public institutions, health and care services, national security and crime prevention. They also make up the majority of the workforce in education and training, research and public transport. Public employees provide the substantive foundation for political decision-making.

When public employees withhold important insights and assessments, the public debate loses important perspectives. This can lead to poorer quality services and could potentially reduce trust in key public institutions.

The Ministry of Digitalisation and Public Governance is responsible for central government's cross-sector employer policy. In the Ethical Guidelines for the Public Service, the ministry makes clear that State employees, like all citizens, have a fundamental right to express critical views about government activities and other matters. In certain cases, they also have an active duty to provide information in order to support citizens' democratic participation.

The Norwegian Commission for Freedom of Expression notes that employees' freedom of expression is well protected under current legislation, and that the key to addressing the identified challenges lies primarily in developing a robust culture of expression. The Commission also observed that certain ambiguities in the regulations may lead employees to impose unnecessary restrictions on themselves. The Norwegian Government will work to address this.

The Government emphasises that freedom of expression is the starting point and a constitutional right, including for public employees. It is important to promote a culture of expression in the public sector that creates security, establishes clear boundaries for freedom of expression, and enables the public to access important information, well-founded professional perspectives and valuable experiences.

The Norwegian Government will

- strengthen efforts aimed at transparency in public administration, in collaboration with civil society, the business sector and academia
- promote transparency internationally through active engagement in forums such as the Open Government Partnership and the OECD
- ensure that the Freedom of Information Act and the principle of maximum transparency are upheld in all public bodies
- foster a culture of openness that supports media access
- enable citizens to express their views on, and influence, political decisions and processes
- work with the social partners to clarify and reinforce the freedom of expression of public employees within the framework of relevant regulations
- encourage the social partners in the public sector to provide guidance and organise initiatives that highlight the freedom of expression framework and promote a positive culture of expression

Priority areas and measures

- review the Ethical Guidelines for the Public Service and develop a training programme to highlight and promote freedom of expression
- evaluate and improve the elnnsyn service
- review the Freedom of Information Act
- consider revisions to protected disclosure procedures in central government
- survey public employees' perceptions of freedom of expression and the culture of expression
- further develop and define a national centre of expertise for child and youth participation at the system level
- provide accessible information on freedom of expression via Ung.no



2.4 Unlawful and harmful speech



2.4.1 Introduction

Freedom of expression is not an absolute right; it is restricted through a range of legal provisions, and breaches can potentially result in criminal or civil sanctions. Other forms of sanctions or responses may also apply. For example, breaches of confidentiality may lead to warnings, dismissal with notice, or a summary dismissal. There are also expressions that are not serious enough to be formally prohibited, but which it may still be legitimate to regulate or restrict through less intrusive means.

Restrictions on expression may be warranted when balanced against other interests and rights, such as the right to privacy, protection of individual reputations, copyright, national security, territorial integrity and public safety. However, measures can also be justified in the interest of protecting freedom of expression itself. For instance, provisions criminalising hate speech directed at particularly vulnerable minorities are intended to ensure they have the opportunity to participate and be heard. Restrictions, prohibitive measures and rules on criminal or civil liability are therefore also part of how authorities meet the infrastructure requirement and facilitate open and enlightened public discourse and freedom of expression in practice.

Under both the Norwegian Constitution and the European Convention on Human Rights (ECHR), any interference with freedom of expression must not only have a legal basis, it must also be necessary to safeguard other pressing societal

We have described freedom of expression as constitutive of society. There are limits to how far restrictions can go without undermining the foundations of society. However, this does not mean that freedom of expression should be unlimited. On the contrary, 'if liberal principles are regarded as absolute, the whole thing turns into absolute illiberalism'. Freedom can only be realised through limitations. The key question is where the boundaries should lie.

Norwegian Commission for Freedom of Expression, NOU 1999:27, Section 6.3.2.1.

needs and be proportionate. This means that restrictions cannot unduly limit the seeking of truth, democratic participation or the individual's free formation of opinion beyond what is necessary to protect other pressing societal needs.

As the focus of this strategy is on the infrastructure requirement and how the Government actively facilitates public discourse, the ministry does not address the legal conditions for restricting freedom of expression in detail. These conditions form the underlying framework and must be met in all instances where authorities implement measures that impact on freedom of expression. For this strategy, the key consideration is normative: when and how should prohibitive measures or other measures impacting freedom of expression be used – or not used – as policy instruments to achieve societal objectives.

2.4.2 Unlawful speech

The Penal Code contains a number of provisions that limit freedom of expression. Key criminal provisions affecting speech include: Section 123 (disclosure of state secrets), Section 130 (influence from foreign intelligence), Section 156 (obstruction of a public official), Section 183 (incitement to a criminal act), Section 185 (hate speech), Section 209 (breach of the duty of confidentiality), Section 225 (accusation of a fictitious criminal act), Section 236 (depictions of gross violence), Section 263 (threats), Section 265 (special protection for certain occupational groups), Section 266 (harassing conduct), Section 267 (violation of privacy), Section 298 (sexually offensive conduct in public or without consent), Section 311 (depiction of sexual abuse of children, etc.), and Section 317 (pornography).

Other legislation also imposes criminal liability for speech, including the Copyright Act, Section 54 (copyright infringement), the Courts of Justice Act, Sections 129, 130 and 131a (prohibitive measures for divulging proceedings, photography and filming), and the Equality and Anti-Discrimination Act, Section 6 (serious breaches of the anti-discrimination provisions).

Where unlawful speech causes financial loss to the affected party, the person expressing themselves may be held liable under general tort law principles. Specific statutory provisions also provide grounds for civil liability for expression, including the Act relating to Compensation in Certain Circumstances, Sections 3-6 (invasions of privacy) and 3-6a (defamation), the Copyright Act, Section 55 (copyright infringement) and the Equality and Anti-Discrimination Act, Section 38.

A key conclusion of the Norwegian Commission for Freedom of Expression was that increasing criminal penalties or introducing additional prohibitive measures is not the solution to the challenges relating to public discourse. Instead, the Commission emphasised that 'a strong and diverse civil society, alongside a sensibly regulated public sphere', is the best guarantee of robust and true freedom of expression.⁵⁵

The Government believes that prohibitive measures, criminal provisions, or other legal sanctions against speech should never be the first resort when challenges arise in the public sphere. Such measures should only be considered once alternative solutions have been assessed and found inadequate, taking into account the scale and severity of the issue.

⁵⁵ NOU 2022: 9, p. 13.

Where legal provisions exist that restrict speech, the primary responsibility of the authorities is to ensure effective enforcement, through oversight, the police, prosecuting authorities and the courts. Effective enforcement is essential not only to achieve the intended effects of the restrictive measures (whether individual deterrence, general deterrence, or restorative) but also to maintain public trust in the rule of law and democratic institutions.

For prohibitive measures to be effective, the relevant audience needs to be aware of and understand the rules. Several submissions to the Norwegian Commission for Freedom of Expression highlighted the need for more knowledge on the boundaries of freedom of expression, as well as improved access to support when faced with comments that are challenging to manage.

The Commission also emphasised the need for greater awareness of, and further research into, the potential social impact of applying criminal provisions that restrict speech. This includes consideration of who is sanctioned, their social background, the basis for the sanction, the practical effects of the various provisions, and whether punitive measures targeting speech actually have a preventive effect.

2.4.3 Harmful speech

Statements that are not prohibited, or that cannot or should not be prohibited in the interests of freedom of expression, can have harmful effects that justify proportionate, less intrusive measures by the authorities. This section focuses on measures intended to limit the expression, dissemination or receipt of specific statements. How the authorities facilitate broad

participation in, and engagement with, the public sphere through positive measures is addressed in Section 2.2.4.

In general, a democratic society should set a very high threshold for government intervention to restrict the expression, dissemination or receipt of statements that are, in principle, lawful. Nevertheless, such intervention may be legitimate depending on, for example

1. the nature of the statement (not all lawful statements enjoy the same level of protection)
2. the potential harmful effects (including whether the statements harm or obstruct fundamental societal processes, such as the seeking of truth, democracy and the individual's free formation of opinion)
3. the type of measure (how intrusive, extensive and targeted it is)

Nature of statement

The closer lawful speech is to the core of freedom of expression, the stronger are the arguments against restrictions on it. Measures against lawful hate speech, harassment, or commercial statements are therefore less problematic than those targeting political speech. Political speech in a broad sense, including criticism of ideologies and religions, lies at the heart of the democratic rationale for freedom of expression and should not be restricted unless particularly compelling reasons deem it necessary.

Harmful effects

Certain statements are not conducive to the seeking of truth, democracy or the free formation of opinion, and can undermine or harm

these objectives. This includes harassment, hate speech or bullying that falls outside the scope of criminal provisions but that can still lead to individuals or groups refraining from democratic debate. It may also involve disinformation from foreign states to influence decisions and attitudes to their advantage, or false information and advice that could result in people making choices that are harmful to their health (e.g. in relation to drugs, vaccines or self-harm). Additionally, it can concern content that primarily poses a risk to minors (e.g. depictions of violence or pornography). These examples demonstrate that the harmful effects can impact on individuals, groups and society as a whole.

However, the impact varies, and some groups are more vulnerable than others (see Section 2.2.4.1). For example, vulnerability and the risk of harm vary in children and young people depending on their age and stage of development.

Other groups may also be particularly vulnerable. Hate speech, harassment and intimidation can, for example, have especially harmful effects on minority groups, not least on their opportunities to express themselves and their democratic participation. This also applies when the content does not fall within the scope of absolutely prohibited statements, such as that covered in Section 185 of the Penal Code or the Equality and Anti-Discrimination Act.

Type of measure

Measures may target the statements themselves (e.g. public awareness campaigns intended to prevent certain types of statements from being made), the dissemination or distribution of statements (e.g. requests or requirements for service providers to moderate content, implement protected disclosure mechanisms, or carry out risk assessments), or the receipt of statements (e.g. requirement for age ratings, personal identification numbers such as PIN codes,

The Audiovisual Media Act (Act no. 7 of 6 February 2015 concerning the protection of minors from harmful audiovisual content) is intended to protect children from harmful influence arising from moving images. The Act defines 'harmful' and 'seriously harmful' media content, and these definitions form the basis for age ratings and other protective measures. The harm threshold functions as a legal standard that permits the criteria for assessment to evolve over time in response to societal change.

Age ratings for audiovisual media are set on the basis of an assessment of whether the content may be harmful to those below the relevant age. The rating is therefore not predicated on evidence that the content *will* have specific, documented harmful effects on children under that age; it is based on risk assessments using the best expert knowledge available at the time.

filtering systems, or labelling). Any measures aimed at countering harmful statements must be proportionate to the nature of the statement and the potential harm involved.

A particular challenge is that measures targeting harmful statements will not always be directly aimed at statements with documented harmful effects, due to limited, inconsistent or absent evidence. Measures may also have

unintended consequences for non-problematic statements. Developing evidence-based measures that are precisely targeted can be challenging or unfeasible. Nevertheless, it is important to maintain a high level of awareness of this issue. The less targeted a measure is, and the greater the risk of affecting non-problematic speech, the more caution should be exercised before implementing it.

The Norwegian Government will

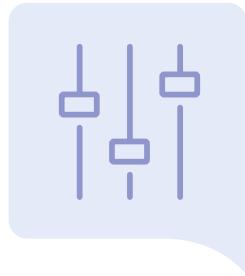
- only consider additional prohibitive measures or criminal sanctions targeting expressions when important societal interests justify them and other, less intrusive measures have been deemed inadequate
- adopt a cautious approach to measures to protect minors, taking into account that the risk of harm varies with age and stage of development
- ensure the effective enforcement of regulations aimed at protecting against unlawful or harmful speech

Priority areas and measures

- update the definition of harmful content in the Audiovisual Media Act and consider legislative amendments in response to emerging digital media
- enhance police expertise in tackling hate crime
- further develop statistics and analyses of police-reported hate crime



2.5 Distortion and manipulation of opinion formation



2.5.1 Introduction

A shared feature of disinformation, echo chambers and polarisation is that they can all, in various ways, distort, disrupt or undermine the flow of information and the open, enlightened formation of opinions in society. Disinformation and covert influence are a threat to the values on which our society is founded. These issues have received considerable attention in public discourse in recent years and continue to cause concern.

A key aspect of the infrastructure requirement is the quality of public discourse. Section 100 of the Norwegian Constitution states that 'enlightened' discourse is needed to contribute to the seeking of truth, democracy and the free formation of individual opinion. The previous Norwegian Commission for Freedom of Expression framed its work around the concept of 'the autonomous individual', recognising that 'a certain level of competence (through socialisation or education) is required to function as an autonomous individual in an open society'.⁵⁶ This competence is developed through participation in a society characterised by social interaction, conversation and discussion, and is

dependent in particular on open and ongoing debate on societal issues in the public sphere.

2.5.2 Disinformation

The National Security Strategy emphasises that efforts to counter disinformation and covert influence help to safeguard democracy, the rule of law and public discourse. Such efforts are also crucial for ensuring high voter turnout and secure elections. Authorities must be prepared, coordinated and capable of responding effectively to these threats.

The Internet has made it easier to spread disinformation and conspiracy theories to a wider audience. AI accelerates the tempo of online content production while making it increasingly difficult to assess the credibility of information. This also creates new opportunities for deliberate manipulation. The proliferation of disinformation also risks leading to uncomfortable revelations or controversial hypotheses being wrongly labelled as conspiracy theories. If people struggle to distinguish authentic, reliable information from manipulated or misleading content, this represents a serious threat to

⁵⁶ NOU 1999: 27 *Ytringsfrihet bør finde Sted* [freedom of expression should be exercised], p. 5.

freedom of expression. All three principles for freedom of expression: the seeking of truth, democracy and the individual's freedom to form opinions (see Section 100, second paragraph, of the Norwegian Constitution) are undermined if we can no longer trust a significant share of the information in the public sphere.

The Norwegian Commission for Freedom of Expression found that the scope of disinformation observed in several countries warrants concern and heightened vigilance in Norway. However, the Commission also noted that Norway is relatively well positioned, with low levels of polarisation, a robust and trusted media system, and a high level of critical media literacy among the population.

Since the Commission presented its report, changes in the security situation, technological advances and shifts in media consumption have altered the threat landscape. The Norwegian Total Preparedness Commission concluded that Norway must prepare for a prolonged period in which it is continuously exposed to influence operations from both state and non-state actors. Given the gravity of the situation, Norway's preparedness needs to be strengthened as a matter of urgency, including in the civilian sector.⁵⁷

In its threat assessment, the Norwegian Intelligence Service (NIS) writes that Russian intelligence and security services use AI and the Internet to propagate anti-Western narratives and incite extremist actors, including in connection with controversial media reports.⁵⁸ The aim is to exert influence and create unrest in

Western countries. The Norwegian Police Security Service (PST) states in its threat assessment that it expects authoritarian states to conduct influence operations in Norway in 2025.⁵⁹

The role that public authorities should and can play in combating disinformation is a complex issue. It is not against the law to misunderstand or make mistakes, or to hold or express opinions that are contrary to broad societal consensus.

Moreover, information is not always entirely true or entirely false. This is a crucial insight that those seeking to manipulate public opinion exploit. They focus on issues that are already polarised, emphasising certain facts and perspectives while downplaying others.

In a democracy, public authorities do not decide what is true or false. Nonetheless, under the infrastructure requirement, they have a responsibility to facilitate a public sphere in which citizens can seek the truth. They are also responsible for providing citizens with the information and tools necessary to make use of this opportunity.

It is therefore also a public responsibility to implement measures that strengthen society's resilience to disinformation, and to closely monitor developments in this area, including the scope of disinformation and influence operations, and their effects on trust, polarisation and public discourse in Norway. The Norwegian Government further details this in its strategy to strengthen resilience to disinformation (2025–2030).

57 NOU 2023: 17 *Nå er det alvor* [*this is serious now*].

58 Norwegian Intelligence Service, *Fokus 2025* [*Focus 2025*].

59 Norwegian Police Security Service, *Nasjonal trusselvurdering 2025* [*National Threat Assessment 2025*].

2.5.3 Echo chambers and information gaps

The emergence of algorithm-driven media platforms has, in many countries, created echo chambers and parallel interpretations of reality that pose a threat to public discourse and trust within society.

Access to a wide range of independent media enables enlightened debate and the development of independent opinions. This has long been one of the main justifications for an active media policy, dating back to the introduction of media support schemes in the late 1960s. However, a diverse range of independent sources alone is not enough to ensure open and enlightened public discourse; citizens must also actively engage with these resources and seek information and perspectives from multiple sources.

Through its media diversity accounts, the NMA has documented that media usage diversity is high overall in Norway. Norwegian editor-controlled journalistic media continue to serve as key sources of news and information for the vast majority of people, across different demographic and social groups. Nevertheless, the NMA has identified some demographic and social variations in media and news consumption.⁶⁰

The Norwegian Commission for Freedom of Expression highlighted that research on echo chambers is more nuanced than public debate

on the phenomenon. According to the Commission, encountering people or sources with differing opinions online is more common than many might expect.

Nevertheless, trends observed in many other countries give cause for concern. It is therefore important to monitor developments closely and maintain a high level of preparedness for similar developments in Norway. Such phenomena can be a potential threat to public discourse and can undermine the trust that underpins Norwegian society today.

As media become increasingly reliant on user revenues to fund their content, there is concern that this may create an information gap, where high-quality information is only accessible to those willing and able to pay for it, while low-quality information (including disinformation and conspiracy theories) remains freely available and spreads via social media. Nevertheless, some editorial media outlets in Norway continue to make much of their content freely available, and NRK plays a key role in ensuring that a wide range of high-quality news remains accessible to everyone. In addition to NRK funding and media support schemes, which foster diversity in content and sources, policies such as the zero rate value-added tax on news media and government purchases of newspaper distribution in areas without commercial distribution networks are designed to maintain high levels of news consumption and ensure diversity in available content.

60 Norwegian Media Authority, [Mediemangfaldsrekneskapen 2025 \[media diversity accounts 2025\]](#).

2.5.4 Polarisation

Diverse and conflicting opinions are a valuable part of society. A functioning democracy relies on the open contestation of competing interests and political viewpoints. In a robust democracy, political divisions cut across society, spanning various demographic and social groups. They vary across topics and specific issues, and are shaped by factors such as socioeconomic background, place of residence, age and broader life circumstances. Very few people agree with a single political party on all issues, and just as few are in total disagreement with all other parties.

The risk arises when societal divisions become so deep that debate is difficult or impossible, or so charged that some resort to violence or other anti-democratic means (see Section 2.2.3.2). Polarisation should not be understood merely as heated debate or strong opposition; it arises when perceived divisions between groups are so pronounced that they inhibit dialogue and erode the sense of community. This can happen as people drift further apart over time, either because political views diverge or through growing dislike of those with different opinions or characteristics. While diversity of opinion and vigorous debate are hallmarks of a democratic public sphere, widespread polarisation can hinder open and enlightened discourse between opposing viewpoints.

The National Security Strategy highlights how the emergence of algorithm-driven media platforms in many countries has contributed to increased polarisation. In 2022, the Norwegian Commission for Freedom of Expression concluded that

the research on polarisation conducted up to that point did not provide sufficient grounds to assert that Norway is becoming increasingly polarised. The Commission further concluded that Norway is, in all likelihood, less polarised than online comment sections might suggest.

In practice, a very small percentage of the population contribute to comment sections, and it is often the most provocative posts that attract the greatest engagement and become most visible. Algorithms amplify this content, which can reinforce perceptions of polarisation. The perception that extreme viewpoints are widespread can, in itself, be alarming or distressing to vulnerable groups. The way algorithms operate can also intensify conflict on social media, as users may be exposed to opposing viewpoints and groups in their most extreme forms, rather than in more moderate or nuanced versions. The perception that opposing views or other groups in society are fundamentally different from oneself can further reinforce the tendency for polarisation.

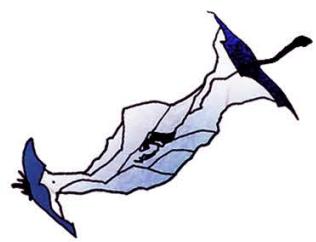
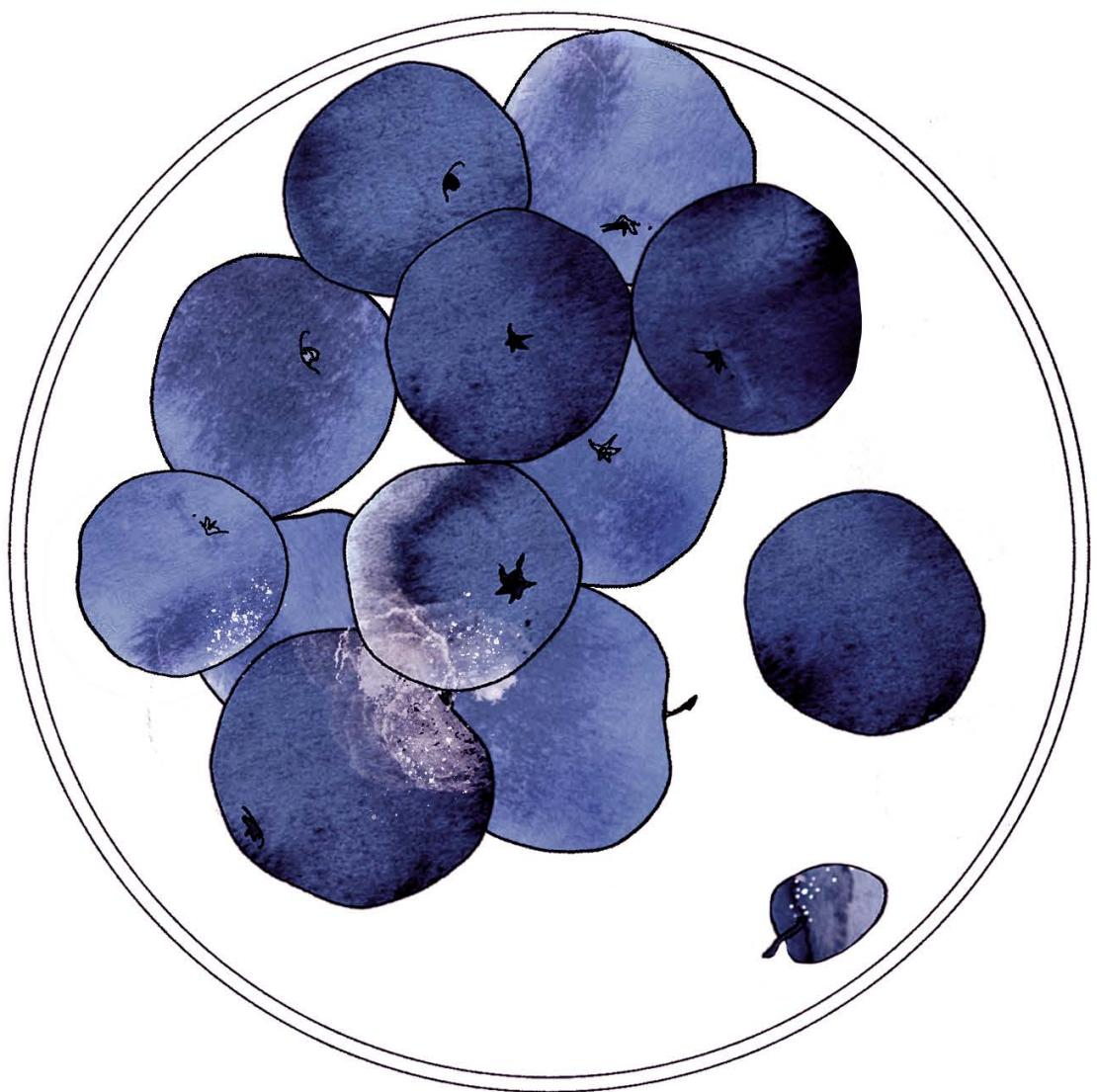
The geopolitical situation has changed considerably since the Commission presented its report. Wars in Europe and the Middle East, along with what is often described as a 'culture war' in the United States, are also generating heated debate and sharp divisions in Norway. We cannot therefore assume that the Commission's conclusions are still fully valid, or that increasing polarisation in other countries will not influence the debate climate in Norway in the future.

The Norwegian Government will

- monitor and implement measures to counter developments that could potentially distort or manipulate the formation of opinions in society
- promote awareness of critical media literacy, source evaluation and data protection among the population
- strengthen democratic resilience, including measures to counter disinformation

Priority areas and measures

- follow up the *Strategy for Strengthening Resilience to Disinformation (2025–2030)*
- follow up Report no. 13 to the Storting (2024–2025) *Prevention of Extremism – safety, trust, cooperation and democratic resilience*



2.6 Knowledge



2.6.1 A robust knowledge base

The infrastructure requirement places an obligation on the authorities to actively facilitate freedom of expression and to intervene when it is under threat. To fulfil this obligation, authorities need a robust knowledge base on the status of freedom of expression. This should include knowledge of the public's engagement with the public sphere and the extent of their participation, attitudes towards freedom of expression and the space for expression, perceptions of these phenomena, and the experiences of different groups in exercising their freedom of expression. Research must be systematic and allow for comparisons over time, enabling the identification of risk factors and undesirable trends in sufficient time to implement preventive and targeted measures.

Going forward, it will be particularly important to conduct research into the driving forces that shape public discourse today, and into factors that strengthen or diminish evidence-based debate and democratic processes. The political, technological, cultural, social, regional and legal

aspects should all be examined. Research is also needed into the factors that promote or hinder democratic competence for all individuals, regardless of background, in education, the workplace and civil society.⁶¹

In its research review, the Norwegian Commission for Freedom of Expression observed that interpreting and comparing studies on hate speech, harassment and similar phenomena is challenging, partly due to the differing use of terms and the varying instructions given to respondents. The Commission, for instance, cautioned against presenting results from non-representative surveys with low response rates as being indicative of an entire group. It also emphasised the importance of transparency regarding research methods, sampling and the categorisation of harassment and hate.

In order for knowledge about the status of freedom of expression to serve as a credible basis for policy development, the knowledge must be developed in accordance with research ethics and scientific principles (see Section 2.1.7).

⁶¹ Meld. St. 5 (2022-2023) *Long-term plan for research and higher education 2023-2032*, p. 56-57.

2.6.2 Assessment of the impact on freedom of expression

The Norwegian Commission for Freedom of Expression specifically proposed that '[i]n the Instructions for Official Studies and Reports, authorities should be required, when introducing new measures for communications control and similar interventions, to conduct a specific assessment of how the measure affects freedom of expression, both on its own and in combination with other existing measures'.⁶²

The Government considers that, in practice, such a requirement can be inferred from the current Instructions for Official Studies and Reports, in light of the infrastructure requirement in Section 100, sixth paragraph, of the Norwegian Constitution. These instructions impose a general duty on the authorities to assess the impact of measures, including the fundamental issues they raise and their likely positive and negative effects. Furthermore,

the preparatory works for Section 100 of the Norwegian Constitution indicate that the infrastructure requirement 'entails an obligation to take the infrastructure requirement into account when the authorities consider legislation or other measures in areas relevant to freedom of expression', and that this obligation 'may impose requirements on the administrative process and on the evaluation of competing considerations'.⁶³

Evaluating how a measure impacts on freedom of expression, including the authorities' responsibility to facilitate open and enlightened public discourse, is therefore a natural part of the impact assessment to be performed when a measure could directly or indirectly influence the exercise of freedom of expression in society.

62 NOU 2022: 9, p. 130.

63 St. meld. no. 26 (2003–2004) *Om endring av Grunnloven § 100 [amendments to Article 100 of the Norwegian Constitution]*, Section 7.6.2.

The Norwegian Government will

- contribute to a robust knowledge base that provides an overview of the status of freedom of expression and enables developments to be monitored over time
- contribute to balanced knowledge gathering that elucidates the positive and negative aspects of freedom of expression and the space for expression
- ensure that measures with the potential to impact on freedom of expression are, as far as possible, grounded in rigorous research
- emphasise the importance of using precise terminology and presenting research findings to the public in a neutral manner
- ensure that the impact on freedom of expression, including the authorities' responsibility to facilitate open and enlightened public discourse, is thoroughly assessed before implementing measures that could affect it

Priority areas and measures

- establish a research centre to conduct long-term studies on public discourse, including the status of freedom of expression, polarisation and disinformation
- initiate regular meetings with key research communities within the field of freedom of expression to maintain an up-to-date overview of developments and needs

3

Norway and the world

This strategy focuses on the Government's efforts to facilitate open and enlightened public discourse in Norway, which is essential for freedom of expression and democracy. However, Norway is 'a country in the world, in war as in peace', a reality that is even more apparent today than when Lars Korvald made this statement during a parliamentary debate in 1972.

The Internet and social media largely transcend national borders, bringing the world closer together. While this has brought major benefits, it has also introduced new challenges and vulnerabilities. The conditions for public discourse in Norway are continuously being shaped by technological advances, global online platforms, and a rapidly evolving cultural, social and political context internationally.

Freedom of expression and freedom of the press are under considerable pressure in many parts of the world. Even countries traditionally regarded as democracies have introduced new restrictions that limit freedom of expression. The rise of state-controlled censorship of the Internet and media channels is part of this picture. Meanwhile, the scope of hate speech, disinformation and propaganda online is fueling polarisation and undermining trust in democratic institutions and values. In many countries, journalists face threats, harassment and surveillance, and female journalists in particular experience gender discrimination, sexual harassment and other forms of abuse. Digital platforms are key arenas for radicalisation and recruitment to extremist networks and organisations, and extremist content is now more widespread on popular commercial platforms than before.

Protecting freedom of expression is a high priority in Norway's international human rights efforts. In political dialogue with authorities in other countries, Norway will be a clear and consistent defender of freedom of expression, including artistic freedom of expression. In multilateral forums, such as the UN General Assembly, the UN Human Rights Council, UNESCO, the Council of Europe and the OSCE, Norway will also play an active role in strengthening the framework conditions for freedom of expression and in speaking out against human rights violations in relevant countries. The Strategy for Promoting Freedom of Expression in Norwegian Foreign and Development Policy outlines the overarching goals and priority measures guiding the Foreign Service's work to safeguard a diverse range of independent media, ensure access to information, provide safe conditions for freedom of expression, including artistic freedom of expression, and protect journalists and other vulnerable groups.

Freedom of expression, freedom of the press and democracy are strongly embedded in the Nordic and Nordic-Baltic cooperation. The Nordic-Baltic countries maintain a close dialogue and frequently adopt joint positions and statements in support of independent media, journalist safety and freedom of expression in

multilateral forums such as the UN, the Council of Europe and the OSCE. The Nordic Co-operation Programme for Culture 2025–2030 seeks to promote freedom of expression and artistic freedom in the Nordic region by increasing the focus on the independent role of the cultural sector and the media. This priority will be followed up through targeted policy instruments, including project funding for cultural and artistic actors, as well as measures undertaken by the successive chairmanships. The established Nordic and

Nordic–Baltic cooperation therefore underpins and strengthens countries' initiatives in culture, independent media and freedom of expression.

Efforts to safeguard freedom of expression, both nationally and internationally, should be considered together. A deterioration in freedom of expression, public discourse or trust in democratic institutions in other countries will also affect Norway. International cooperation is therefore necessary.

The Norwegian Government will

- act as a strong defender of freedom of expression and freedom of the press in multilateral forums, including the UN, the Council of Europe and the OSCE
- support international efforts to protect journalists and combat impunity for violations and abuses
- contribute to good international conditions for freedom of expression by maintaining an active role in multilateral forums and in dialogue with authorities in other countries

Priority areas and measures

- follow up the *Strategy for Promoting Freedom of Expression in Norwegian Foreign and Development Policy*
- utilisation of EEA funding to strengthen civil society, democracy, the rule of law and human rights
- follow up Report no. 20 to the Storting (2024–2025): *Promoting democracy, rule of law and human rights in Europe*
- host the UN Internet Governance Forum 2025
- chairmanship of the Council of Europe's Group of Friends for the Safety of Journalists and Media Freedom

4

From principle to practice

As this strategy demonstrates, the Norwegian Government works continuously across various fronts to safeguard freedom of expression and ensure a well-functioning public sphere. Numerous ministries and agencies are involved, and the Government's efforts complement and align with initiatives by civil society, the business sector and individual citizens.

The Government's efforts in freedom of expression are ongoing and extend beyond this strategy. The primary purpose of the strategy is to establish principles for, and highlight, the Government's overall work in the area of freedom of expression. The priority areas and measures presented represent a selection and a current snapshot of ongoing work. More initiatives and measures will be presented on an ongoing basis

on a page dedicated to freedom of expression on the Government website, regjeringen.no.

The Government will facilitate political debate on these topics, including through oral reports to the Storting on the status of freedom of expression and the efforts in promoting open and enlightened public discourse.

The aim is also that the strategy itself will contribute to open and enlightened public discourse on freedom of expression, the culture of expression and expression preparedness in the period ahead.



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