ABBREVIATIONS

WEA: Working Environment Act
KUD: Ministry of Culture
CEDAW: Convention on the Elimination of All Forms of Discrimination Against Women
Difi: The Agency for Public Management and Government
ECH: The European Convention on Human Rights
Institute of Applied Social Science (FAFO): Independent foundation that carries out research on working life, welfare policy and living conditions. At the national and international levels.
FGM: Female Genital Mutilation
ILO: International Labor Organization
LDO: The Equality and Anti-discrimination Ombud
LDN - The Equality and Anti-Discrimination Tribunal
NGO: Non-Governmental Organization
NKLM: National Center for Emergency Primary Health Care
NOK: Norwegian kroner
NOU: Norwegian Public Report
POD: The National Police Directorate
PU: The National Police Immigration Service (NPIS)
SCR: Security Council Resolution
SSB: Statistics Norway
St. prp.: Proposition to the Storting
St. meld.: White Paper
STRASAK: The Central Police Registration System
UDI: The Norwegian Directorate of Immigration
UNHCR: The Office of the United Nations High Commissioner for Refugees
WPATH: World Professional Association for Transgender Health
About the report

The Beijing Declaration and Platform for Action on women’s rights was adopted at the UN’s Fourth World Conference in Beijing in 1995. In June 2019, the Norwegian Government submitted a report to UN, that cites examples of measures Norway had implemented in the field of gender equality, and provides an overview of selected challenges and priorities during the past five years and in the five years to some.

The women’s movement has an important role to play in overseeing and monitoring how Norway conducts itself with regard to women’s rights and gender equality, as well as for assessing what measures are required. For this reason, the women’s movement produced a shadow report in response to the Government’s own report in order to illuminate the situation for women in Norway in various areas of society. It is important that civil society recognizes the reality of women’s lives relative to Norway’s obligations.

This Shadow Report is a joint initiative by Norwegian NGOs. Each organisation has contributed their expertise and knowledge in their particular field. The issues raised in particular sections reflect the concerns and the expertise of these organisations.

FOKUS – the Forum for Women and Development is a Norwegian umbrella organization that has 52 women’s organizations and groups as member organizations. FOKUS has coordinated the shadow reports from Norwegian civil society on behalf of its own member organizations and numerous others.

The report has been made possible thanks to financial support from the Ministry of Culture.
Introduction

Equality has made progress in Norway since the women's conference in Beijing in 1995, with different governments contributing to different advances. Sadly, however, we find that development has moved in the wrong direction in some areas, also in Norway. Advances and positive changes often take place in response to initiatives, proposals or demands made by women's organisations, other civil society organisations or more loosely regimented actions. In a global context, despite certain setbacks, Norway has made great strides, instituting many judicious schemes accompanied by legislation to promote equality, all of which contribute to a good framework.

Reports to the UN on how Norway has followed up the Action Plan from the women's conference in Beijing in 1995 must be viewed in the light of the requirements imposed on the UN's member states in the 17 sustainable development goals. Women and gender equality have one dedicated goal (Goal 5), and are also reflected in all the other goals that have their own indicators. The UN's sustainable development goals will have existed for 5 years in 2020, meaning that in just 10 more years, they are supposed to be fulfilled in all UN member states. Norway has a strong grounding in the sustainable development goals and in relation to women and equality, and it should now be ramping up its efforts to achieve equality.

The report is lacking interdisciplinary perspectives that render visible immigrant women and the legal situation for young girls in Norwegian society. On that account, we have added a new point on the tightening up of immigration legislation and a new point on racism in Norway's public sphere.

The report as filed is almost gender-blind, and the broad concept of discrimination that now prevails in politics has been given too much space in a report intended to be based on the Action Plan from Beijing, which deals with girls and women specifically. It is also mentioned more than once that initiatives are universal, meaning that there are no gender analyses underlying them; we would like to know whether gender-based statistics are kept on universal initiatives.

Abortion is not mentioned in the Norwegian government’s report, despite the fact that the topic has been highly politicised in Norway on several occasions over the past few years. We have therefore added text on this topic at both the national and the international levels.

As regards education, the report should to a greater extent discuss the current situation rather than referring to processes that may lead to positive changes for equality. This refers, for example, to new teaching plans and references to the Stoltenberg Report and to the #Ungidag Committee, which has not yet submitted its report.

In the part of the report that deals with peaceful, inclusive societies, a great deal of space was devoted to the narrow topic of Norway's work related to women, peace and security. Peaceful societies and inclusive societies are about a great deal more than this alone, and a broader approach should be taken with a view to what is being done on the part of Norway in relation to the country's foreign and development policy.

LBTIQ

This point is not included in the Beijing platform, but it represents rights that are important to include now, 25 years after Beijing.

Healthcare and research related to special challenges have not been adequately described.

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1 NORWEGIAN PUBLIC REPORT (NPR) 2019: 3
New odds – better learning — Gender differences in academic performance and educational outcomes
There are special challenges for some LBTIQ individuals who are not from ethnic Norwegian backgrounds, and where social control complicates their lives and reduces their quality of life.

Measures:

- Thorough, comprehensive new research must be carried out on living conditions and quality of life. The only research done to date is 20 years old.
- Measures are needed in reception centres to protect LBTIQ individuals who arrive in Norway as asylum-seekers. The lack of opportunities to be open and to feel safe may contribute to poor mental health.

LASTING CHALLENGES

Violence is not listed among the “lasting challenges”, so it should be identified as being one of the highlighted areas. As it stands now, only work-related areas are described as lasting challenges. There is a correlation between violence and working life. For example, both sickness absence and the participation of immigrant women in working life are influenced by violence against women.

GENDER-DIVIDED EDUCATIONAL CHOICES

The evaluation of the action plan for equality in daycare and pre-school indicates that equality is a topic of which many of those responsible for the services are barely aware. Even though different surveys indicate that boys and girls are treated differently based on gender in daycare and school, little attention has been devoted to how gender stereotypes and attitudes are dealt with in actual practice in the education of and care for children in the individual unit.

School is an important arena, not least in relation to efforts to promote equality. It is important that young people make choices based on their wishes and abilities without finding themselves prisoners of expectations on the part of society, friends and family. To help pupils make good educational and occupational choices, regardless of traditional gender roles, it is necessary strengthen school counselling services.

Measures:

- School counselling services must be strengthened.
- The authorities and the employers' and employees' organisations must raise the status of jobs and work to prevent pay disparity discrimination.

TIGHTENING UP OF IMMIGRATION LEGISLATION

The introduction of more immigration restrictions in recent years has had unfortunate consequences for women in particular. One requirement for a permanent residence permit is that the foreigner must be able to support him-/herself. Many of the women who come to Norway are from cultures in which woman are not the main bread winners and do not work outside the home. The Brochmann Committee's report shows that employment is low among several immigrant groups in Norway, and

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2 The Immigration Act. §62 ff.
3 NORWEGIAN PUBLIC REPORT (NPR) 2011: 7, the Brochmann Committee (the Welfare and Migration Committee)
especially among immigrant women. This may mean that a great many women do not have the resources to fulfil the requirement for being self-supporting, which may make it especially difficult for them to obtain permanent residence in Norway. There are also asset and income requirements for getting Norwegian citizenship. For the same reasons as mentioned above, this may mean that women do not qualify for Norwegian citizenship, which may affect their affiliation to the country, among other things. For family reunification, the requirement refers to the reference person’s ability to provide support. These rules may run counter to the right to family life, entailing indirect discrimination of immigrant women.

Paragraph 32 a) to d) in the CEDAW Committee’s conclusive observations about Norway states:

The Committee is concerned that one requirement for obtaining a permanent residence permit in connection with family reunification is that one first spends three years in the country on a temporary residence permit. This may force women who live in violent relationships to stay with their violent partner for three years. There is an exception provision that allows residence on an independent basis in the event that one is a victim of violence or abuse, but the threshold for obtaining residence under this provision is excessively high.

The tightening up of immigration law has disproportionate consequences for minority women. Among other things, this refers to the requirement regarding income and support in order to achieve family reunification, as well as the strict requirements for participation in Norwegian courses, even during parental leave.

There are still challenges to achieving equality and inclusion before full equality is achieved for minority populations.

Measures:

- The Norwegian authorities must review the requirements for being granted residence on an independent basis and the relevant provisions in immigration law to ensure that these do not have disproportionately negative consequences for minority women.
- Norway must ensure independent residence permits for women who come into the country for family reunification. The threshold for obtaining an independent residence permit is too high today.

THE CASH BENEFIT SCHEME

On 1 July 2017, the residence requirement to qualify for the right to cash benefits for families with small children came into force. This entails that a foreigner must have lived in Norway for at least five years to qualify for the right to cash benefits for families with small children. The purpose of the requirement is to get immigrants into the workforce quickly. However, the residence requirement means that minority women’s lives are regulated differently from the lives of the women in the majority population. There is a limit to how far one can go in framing such parallel sets of rules without it leading to illegal differential treatment. Research suggests that there are factors other than financial incentives that cause immigrant women to stay at home with small children rather

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4 §7, litra d of the Norwegian Nationality Act.
5 §40b of the Immigration Act
than joining the workforce. Consequently, there are no good reasons for having a residence requirement to qualify for cash benefits for families with small children.

Measures:

• It is recommended that the different requirements for housing, benefits and residence time in the Immigration Act, the Norwegian Nationality Act and the Cash Benefit Act be revised.

RACISM IN NORWAY’S PUBLIC SPHERE

For the work to strengthen the rights of immigrant women to succeed, it is imperative that the work has an anti-racism perspective. Muslim women are often portrayed as victims, as the “unequal others”, and they are often referred to as an equality problem. To alienate, stigmatise and reproduce stereotypical notions of immigrant women does not help to resolve the challenges and the violence experienced by some immigrant women, but rather on the contrary, creates more distance between immigrant groups and the majority society.

There is a need for action plans and strategies that deal with the racism in Norwegian society. Neither the action plan against negative social control from 2017 nor the Norwegian government’s integration strategy for 2019-2022 even mentions racism.

Measures:

• The efforts to improve equality among immigrant women must be understood from an intersectoral perspective and be seen in the context of the struggle against racism.

EQUALITY POLICY PRIORITIES

Gender-neutral legislation, policies and plans can lead to insufficient protection against direct and indirect discrimination of women and be an impediment to achieving genuine equality between women and men. This was pointed out by the CEDAW Committee after the Norwegian reporting and hearing in 2017.

Gender parity and discrimination can be two sides of the same coin, but it is crucial to be clear about the woman’s and gender perspective in policy making when striving for equality.

We support the Committee’s recommendation to clarify the gender perspective in legislation, reports and policy development.

Measures:

• Equality analysis is an important policy instrument for public studies and reports. There is a need for better follow up, not least through the Storting’s parliamentary budget deliberations.

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6 LDO. CERD 2018. The Ombud’s report to the UN Committee on the Elimination of Racial Discrimination.

- Mainstreaming has proven inadequate and must be followed up by creating clear lines of responsibility, and goals for how to be an effective tool for achieving equality.
- The authority to issue instructions should be strengthened to emphasise the gender equality perspective.
- The implementation of a new Gender Equality and Anti-Discrimination Act must render visible the part of the objective of the act that strengthens the position of women and promotes equality.
- The government budget must be subject to an annual analysis to identify gender-related budgetary consequences, i.e. “gender budgeting”, which will render visible and clarify what must be done to achieve genuine and full equality.

Regardless of differing opinions on the matter of the Equality and Anti-discrimination Tribunal’s expertise versus the Equality and Anti-discrimination Ombud’s responsibility, it is too early to say whether the change will have the intended effect, and how the situation will turn out relative to the Committee's recommendations. It is, however, positive that a low threshold offer of potential sanctions has been established and that, in time, sanctions will also be available for sexual harassment.

Conversely, we see that the efforts to promote equality largely imply a redistribution that undermines the resource situation of the women’s organisations, reduces women’s access to legal counsel and constrains civil society’s international efforts, e.g. by cutting out the contact conference, which was coordinated by FOKUS, in favour of a national equality conference, but without acknowledging that both conferences are needed.

Equality does not simply happen. After first withdrawing the red-green Government’s White Paper on Gender Equality, the prime minister submitted a new White Paper on Gender Equality that has been criticised for having too few initiatives and lacking the funding needed to take action.

Measures:

- There is a need to secure predictable financial parameters for women’s organisations.
- There is a need to strengthen volunteer organisations that provide work related to rights and services.
- FOKUS’ coordination of the civil society’s work must continue and be stepped up.
- LDO must be strengthened and given the parameters needed to carry out its comprehensive efforts. The work with women and equality must be strengthened further.
- The equality centres must be strengthened and ensured predictability.
- Research on women and equality must be strengthened and given broader parameters for multi-faceted research and discussions.

JOINT GENDER EQUALITY AND ANTI-DISCRIMINATION ACT

Equality analysis is important in public studies and reports, and the implementation of a new Gender Equality and Anti-Discrimination Act must render visible the part of the objective of this act that strengthens the position of women and promotes equality.
INCLUSIVE WORKING LIFE

Women work part-time, shifts/rotations and temporary jobs more often than men. In addition, many women have less say about their routine work days than men. Both individually and collectively, this puts women in a more tenuous position at work.

In relation to the provision of services in particular, there is a fear that social dumping will be a growing problem, adversely influencing wages and working conditions due to unscrupulous players and the movement of labour across frontiers.

Involuntary part-time work is a phenomenon seen in typical women's occupations, e.g. the healthcare and care sector, as well as in the cleaning industry and the hospitality industry (hotels and restaurants). It is a result of stereotypical gender roles that have led to shift work, where part-time is the norm in women's occupations, but not in men's occupations.

The trend towards equal wages is moving too slowly, preventing change in a gender-divided labour market.

Educational and occupational choices are not influenced exclusively by gender, but to a great extent by social class and parents' status. Social inequality and social capital cannot be reduced to gender alone.

Norway has implemented a pension reform that is designed to keep people in the workforce for longer. The equality-related consequences of this comprehensive and complex reform need to be studied.

An unequal parental benefit scheme under the National Insurance Act limits many women's career opportunities, as well as men's opportunities to care for children. Today, the so-called activity requirement deprives 6 000 fathers a year from taking advantage of their accrued right to a paternity leave/their share of parental benefits, because the mother did not work prior to giving birth and has to start working after giving birth in order for the father to be able to take paternity leave. Many recently arrived immigrant women have not had the opportunity to work before giving birth, even though the father has earned wages. The ESA has ordered Norway to eliminate this so-called "activity requirement", and this must be followed up. The Norwegian scheme inhibits gender equality in the home and discriminates against fathers.

Measures:

• Efforts to promote full-time work among women should be studied in greater detail. The State must undertake an obligation to evaluate the effects of the amendments to the Working Environment Act.
• The term "voluntary" used in connection with "part-time work" should be discussed in connection with the proposal for an employer's duty to carry out an annual survey of employees' wishes to work more hours and their chances of doing so, if this is to be followed up.
• The effects of the demands that health enterprises develop a culture of full-time employment must be gauged and published.
• The term "considerable disadvantage" should be discussed in the context of full-time/part-time work. Today, the term has been watered down and is perceived by many as an acceptable, almost "general disadvantage".
• HSE training must be improved so that it can detect the challenges inherent in female-dominated occupations.
• Occupational injury legislation should be reviewed with a view to including injuries caused by stress and strain in typical female-dominated occupations.
• The pension reform should be evaluated from a gender perspective to determine what outcomes the reform may have for women.
• Equal remuneration for work of equal value (ILO) must be promoted even more.
• The correlation between the gender-divided labour market and the wage gap must be challenged. It is difficult to recruit males to female-dominated occupations when the wage gap (for work of equal value – seen across undertakings, sectors and salary scale areas) continues to exist.
• The correlation between an active, equal family policy and structural obstacles to women's full participation in working life must be identified and explained in reports. It must be emphasised that under the new ministerial structure, where responsibility for equality policy has been moved to the Ministry of Culture, there is no longer any one ministry that has equality as part of its name.
• Violence and harassment in the exercise of the provision of services must be discussed as genuine problems, especially in many types of first-line services in the service industry and public services.

Immigrant women's participation in education and working life
To achieve financial independence and have a chance to become integrated into society, women from ethnic minority backgrounds must be allowed access to the labour market. However, there are too few offers and schemes that succeed in doing this, and many women experience discrimination at work.

According to the Act on an introductory programme and Norwegian language instruction for newly arrived immigrants (the Introduction Act), the Act relating to Social Services, the regulations governing labour market measures and through the programme “Job Opportunity”, recently arrived and long-term refugee and immigrant women can get job training and language courses. However, there is significant disparity in the priorities of different municipalities and urban districts, leading to offers being good in some places, but bad in others.

Further, the instruction offered is rarely adapted to the individual woman's needs. Research indicates that only half of the women who participate in the introduction scheme become employed or enrol in educational courses after completing the programme, and goal achievement among women is far lower than among men. One reason for this may be that under the new ministerial structure, where responsibility for equality policy has been moved to the Ministry of Culture, there is no longer any one ministry that has equality as part of its name.

Several women have stated that under the current system, they move from 'one trainee position to the next', without getting any offers of employment. There are certain requirements that apply to employers that accept individuals for job training, but in far too many cases, women get very few genuine job offers after completing their practical training period. The requirements that apply to the organisation/company that accepts individuals for job training are, as of today, that they must be registered in the employers' register, and that contact with the employer and the follow up of the trainee shall be logged. Discrepancies or suspicions that the trainee is being taken advantage of are
to be reported. Trainee schemes are a good incentive for getting work experience and building a network in the labour market.

Further, it is a serious problem that the women who have participated in the introduction programme fail to attain the goal of being self-reliant and are therefore dependent upon public assistance or other benefits such as money allocated for special programmes. These benefits do not accrue rights such as pensions, sickness benefits, parental benefits or the like. Women are also particularly vulnerable if they are not engaged in any activity, e.g. Norwegian language instruction, in connection with giving birth and the post-natal period. The lack of financial independence that this system helps to maintain can put women in a highly vulnerable situation, especially if they are exposed to violence or social control.

Finally, women from ethnic minority backgrounds experience discrimination in working life, especially in connection with job seeking. Women who wear shawls/hijabs report that they encounter obstacles in the job-seeking process, because employers prefer not to hire women who wear shawls, etc. and several have experienced not being called in for interviews because their names do not sound like Norwegian names.

Many women experience the trainee scheme as a gross form of exploitation.

Measures:

- Clear guidelines must be drawn up for municipalities and urban districts about how job training and language-learning programmes should be carried out.
- It is decisive that responsibility be moved from the individual woman, to state and private players that have the authority and expertise to get more people into the workforce.
- Employers must be required to ensure that trainees are not used as free labour, without any plans to hire them.
- To boost employment among the women, it is decisive that measures be implemented to prevent discrimination of immigrant women in working life.

DISABLED WOMEN

Norway does not have sufficient statistics on disabled women due to lack of research on multiple discrimination. A gender perspective is rarely included in research on persons with impairments and gender studies seldom focus on women with impairments. Even though the gender equality policy is claimed to be multidimensional, there is no initiatives or targeted measures that includes disability. There are no studies on discrimination against disabled girls/women compared to discrimination against disabled boys/men.

Women with impairments are more often exposed to violence than men with impairments.

More women with impairments work part-time (53.3 percent) than men (27.6 percent).

Forced interventions like abortion and sterilization against disabled women, if a guardian demands it, is permitted, see art. 17. It is not known how many are subjected to this. Pursuant to the Abortion Act, the guardian can put forward a request for an abortion if the woman has a “serious mental illness” or intellectual impairment.
Measures:

- Disabled women must be included in policies and efforts that specifically target women or aim to empower women.
- Issues relating to disabled women in particular must be given special attention in research and statistics
- Abolish legislation that allow forced interventions, like abortion or sterilization of disabled women and girls.

POVERTY, PROTECTION AND SOCIAL SERVICES

Women in prison

Paragraph 46 in the CEDAW Committee's conclusive observations about Norway states:

- The Committee is worried that prison conditions for women in prison are still not good enough, and that they have far worse prison conditions than men.
- Women must more often serve their time far away from their family, they are frequently exposed to sexual harassment in prison, they have less access to outdoor areas than men, and the drug rehabilitation programmes and work training programmes are not good enough.
- The Norwegian authorities must step up their efforts to improve prison conditions for women and bring them into line with the so-called Bangkok regulations.

Multiple factors contribute to women serving time under less favourable conditions than men, simply because they are women. This is partly because, at any given time, women are a minority that makes up roughly 6% of the prison population. Women in prison frequently experience being low priority due to a lack of resources, and some are marginalised due to their language background, functional abilities, etc.

Women have special health-related needs that differ from those of men. Roughly 50% of the women in prison have been abused at some time in their lives. This means that some women need trauma treatment, while others will have a pressing need for medical assistance from a female therapist. Even if the prison doctor is a man, under the current regulations, inmates are not allowed to change physicians. This may mean that women who have health-related needs, fail to seek help.

Measures:

- Inmates who need and want trauma treatment must be given an offer of help.
- All inmates must have right to decide whether they want to be treated by a female or a male therapist. Inmates should also be allowed to choose whether they want a female or male liaison/contact officer.

Inmates who need and want trauma treatment must be given an offer of help, and all inmates must have the right to decide whether they want to be treated by a female or a male therapist. Inmates should also be allowed to choose whether they want a female or male liaison/contact officer.
Since there are fewer women's prisons, women are frequently incarcerated far away from their hometowns. This also means that many find it challenging to maintain contact with family and friends, i.e. people who may be important for inmates' transition back to society after release.

Measures:

- Travel support for visitors should be possible for women who are serving time far from home. Travel support must also include expenses for travel companions for small children.
- For women who cannot receive visitors, e.g. due to illness or because their family lives in another country, there should be compensation measures. The Norwegian Correctional Service should ensure that these women are granted extended telephone time and access to Skype.

There are too few minimum-security facilities where women can serve time. This year, two minimum security prisons with places for women were shut down. This means that the rights of some women according to the principle of not serving time in a prison with a higher security level than necessary are sometimes set aside.

Women find themselves locked in their cells on weekends due to understaffing and when something unforeseen happens in the prison. In mixed-gender prison facilities, women state that it is the women's ward that is consistently locked down first when multiple officers are called to another ward, since the lock-down will affect fewer prisoners all in all. Female inmates thereby experience being routinely subject to isolation, with the adverse consequences that has for the individual, despite this not being related to their own actions. Another form of actual isolation can occur if an inmate does not speak the same language as any of the other inmates. In such cases, it will be difficult for the person in question to establish meaningful social contact with other inmates.

Measures:

- Understaffing should not be a reason for lockdowns.
- Prisons should be required to report all isolation and long-term lockdowns of inmates.
- For women who, due to linguistic and cultural barriers, face challenges in relation to having meaningful social contact with other inmates, the Norwegian Correctional Service should institute compensatory measures.
- Efforts should be made to determine whether inmates with a common language background can serve time in the same prison.

Prison duties for women who are serving time are sometimes not relevant and/or are gender stereotyped. In mixed-gender prisons, women do not have the same opportunities as men to participate in group instruction and activities with male inmates due to the safety risk that the others represent for them.

Women should be guaranteed relevant, qualifying educational or work programmes while serving time, on an equal footing with men. Duties offered to women should not exclusively be gender stereotyped. In mixed-gender prisons, women should be guaranteed access to existing educational and work programmes on an equal footing with men. In the event that consideration for the women's safety in prison means that they cannot participate in joint activities with men, the prison must institute compensatory measures to ensure that women do not get a less worthwhile offer simply because they are women.
MEASURES AIMED AT THE HEALTH OF GIRLS AND WOMEN

Abortion
In 2013, the Abortion Act came under attack from the current government, which proposed a bill allowing general practitioners an opportunity to reserve themselves against providing referrals for abortions. After massive protests from civil society, the bill was not adopted. In autumn 2018, the current government again proposed amending the Abortion Act, this time by deleting §2c of the Act, which says that after the 12th week of pregnancy has elapsed, the pregnancy may be terminated when "there is a major risk that the child may suffer from a serious disease". After vehement protests, the proposal for this amendment was also withdrawn. In 2019, the government adopted the first tightening of the Abortion Act since it was adopted in 1975. In 2016, it was clarified by the Department of Legal Affairs at the Ministry of Health and Care Services that foetal reduction of one or more foetuses in multiple pregnancies was covered under the current Abortion Act regarding elective termination of pregnancy up to the end of the 12th week of pregnancy. The new bill eliminates the principle of a woman's right to elective abortion up to the 12th week of pregnancy, and women who petition for foetal reduction must appear before a board regardless of how advanced their pregnancy is. This bill was adopted in the face of massive resistance from almost the entire healthcare community.

The right to abortion is one of the most fundamental health-related rights for women and ensures women the right to decide over their own bodies. The fact that this right is repeatedly on the negotiating table and being used by the current government in a political power play, is a frightening development and a challenge to continued equality. A large majority of the consultative bodies also oppose the proposed amendment.

- It is important not to curtail women's right to self-determined termination of pregnancy as that right has been practised and legitimised for more than 40 years in Norway.
- It gives cause for concern when we see a global tendency towards such restrictions at the national and international levels alike.
- In addition to protecting women's rights in this field here in this country, Norway should escalate its development cooperation funding for reproductive health.

Contraception
The right to free contraception has been extended and now applies to the age 16-23 demographic. Being able to take precautions against unwanted pregnancy is a human right also for young girls under the age of 16.

Measures:

- Free contraception must also be provided for those under 16 years of age.

Pregnancy, delivery and the post-natal period
A particularly vulnerable period in women's lives is the time during pregnancy, delivery and the post-natal period. During this period, there is a great risk of developing depression, psychoses, and other mental illnesses.

In Norway, all pregnant women are entitled to pre-natal check-ups. They are given advice and guidance about their pregnancies, and about giving birth and the upcoming post-natal period. Follow
up by a midwife during the pregnancy is supposed to be a genuine alternative for all pregnant women, but, regrettably, this is not entirely possible today.

Fewer than 300 midwives are employed in the municipal pre-natal care system, which is intended to provide care for more than 60 000 pregnant women each year. With so few positions per municipality, it is not likely that pregnant women will be followed up by midwives equally all over in Norway.

Higher ages for first-time mothers, elevated BMIs among pregnant women and a higher proportion of pregnant women with serious underlying conditions entail formidable health challenges for women before/during and, not least, after giving birth. These factors call for greater efforts on the part of the primary and specialist health services.

The number of maternity units in Norway has been reduced by half over the past 40 years. Today, Norway has fewer maternity units than the number recommended by the WHO relative to the population. The reduction in the number of maternity units has led to a growing number of women living more than an hour away from a maternity unit. This has caused deterioration in the health of mothers and children in Norway. Further closures and the centralisation of health services are planned and will have consequences on maternal health. This, along with mandatory reductions in how long women are allowed to stay in a maternity unit have been met with large-scale protests all across the country. The number of municipalities requiring travel time of more than two hours has increased from five per cent in 2012, to 18 per cent.

The large maternity wards lack the staffing needed to provide one-to-one care, with the consequences that can entail.

A united specialist community is now deeply concerned that post-natal care is deteriorating. Post-natal care has been used as a balancing item on the national budget, despite increased births involving surgery, higher maternal ages, a higher proportion of serious underlying conditions, and a higher proportion of women who experience complications after giving birth. As a step in the Interaction Reform, the time spent in the hospital after giving birth has been reduced, and mother and child are often released before breastfeeding has been established.

In January 2014, new national specialist guidelines for post-natal care were published, recommending a home visit to all newborns by a nurse. This is not being followed up due to a lack of resources.

Measures:

- The midwife service is under pressure. More midwives must be trained, and the municipalities must ensure there is adequate assistance from midwives during transportation to maternity units, as required by law.
- All municipalities should be required to ensure early home visits by a midwife, in addition to home visits by a nurse.
- More midwives are needed in the Municipal Health Service, as only half of Norwegian municipalities have midwives.
- More nurses must be hired at public health centres and school health services.

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9 https://www.vg.no/spesial/2019/fodselsrigget/
Women's health in a life-cycle perspective

There are still large gaps in research on women's diseases, diseases that affect women to a greater extent than men, and on how diseases and symptoms present differently in men and women. Women are more susceptible to chronic pain and have a higher risk of being disabled. There is still a lack of research on the causes of this and on what factors play a part.

Measures:

- Funding must be made available for more research on women's health in a life-cycle perspective.

Sex education at school

Sex education is sought after by pupils. Teachers are asking for more knowledge and expertise. This should have been emphasised more clearly in Norway's report. Sex education is an initiative that has preventative and favourable effects on many of the other measures outlined under health, equality and non-discrimination.

"Sustainability", "Democracy and citizenship" and "Public health and coping with life" are to be interdisciplinary topics at school, all of which have elements to which sex education is relevant. The general part of the curriculum also sets out guidelines for sex education that are intended to represent a positive approach to the body, relationships, setting boundaries, gender and understanding. Sexual harassment (#metoo) could be included here and having a critical attitude to norms is important.

Sex education is well-anchored in teaching plans and the health strategy entitled "Talk about it"\(^{10}\), but this is not reflected in the ranking of financial priorities.

The draft report Beijing + 25 has devoted a relatively great deal of space to Official Norwegian Report (NOU) 2019:3 New odds – better learning. The Stoltenberg Committee's most important task was to gather a balanced knowledge base on why boys get poorer grades than girls through their 13-year educational trajectory, and to find measures to remedy this situation. Beijing + 25 is subtitled the situation of girls and women in Norway. A minority proposal regarding flexible school starts has been put forward and is generally intended to be relevant for boys born late in the year.

Measures:

- Gender-based harassment and bullying must be included. There is a need for research in this area, as well as for dialogue between school and home, and for its inclusion in teaching plans.
- Sex education should be integrated into individual subjects by adding special knowledge goals.
- There is a need for funding to improve sex education throughout the country and in different languages, and to respond to prevailing policies and meet needs expressed by pupils and teachers.

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\(^{10}\) https://www.regjeringen.no/contentassets/284e09615fd04338a817e1160f4b10a7/strategi_seksuell_helse.pdf
Immigrant women's access to medical assistance and information on sexual and reproductive health and rights (SRHR)

The Action Plan Against Rape from 2019 states that many women from minority backgrounds do not take advantage of the support system, owing not least to little awareness of the support system, poor language skills and fear of reprisals from family or networks if one seeks help.¹¹ As from 1 January 2018, health legislation was amended so that it now states expressly that health care personnel has a responsibility to fight and prevent violence and sexual assaults. However, there is little focus on enhancing their expertise in the field of cultural sensitivity. This can impede the services in preventing, detecting and averting violence and abuse in the immigrant population.

Women from minority backgrounds are in a vulnerable position when it comes to accessing necessary information related to their sexual and reproductive health and rights. There are also studies that indicate that women from minority backgrounds have a greater risk of unwanted pregnancies and less knowledge about contraception than the majority population.¹² Norway features good health services, and there are several providers, including public, private and volunteer players

Measures:

* It is necessary to improve skills in the support system relating to the prevention of violence and sexual assaults.
* We must strive to make clearer guidelines on how women from minority backgrounds should be made familiar with their rights, e.g. whether this should be the responsibility of the public health service or other public services.

VIOLENCE, STIGMA AND VIOLENCE AGAINST WOMEN

The United Nations Commission on the Status of Women has criticised Norway severely for the scope of violence against women. Norway has been a clear, important voice for fighting sexualised violence at the international level. The government must follow this up at the national level. Few cases of abuse are reported, and even fewer result in convictions; Norway has also been criticised for excessive processing times. Violence and cases of abuse must be given priority by the police, investigations must be better, and processing time must be reduced.

Norway has previously been criticised for having overly gender-neutral legislation. This applies to violence against women in particular. Men are also affected by domestic violence, but it is still women who are susceptible to the most serious, systematic violence. This fact must be reflected in the legislation.

The Action Plan against Domestic Violence was implemented in 2017. There is a need for a new action plan to prevent, identify and follow up domestic violence.

Genital mutilation is considered violence against women and must be discussed as such. The authorities’ efforts to prevent and identify genital mutilation must be strengthened. In addition, it is

assumed that 17 000 women who live in Norway are already circumcised. The physical and mental health services offered to these women are not good enough. There is a need for more expertise on the part of health workers who deal with the women and who ensure that there is an infrastructure in the public health service that safeguards their needs.

The focus on online violence and abuse must be strengthened. These days, more girls are being exploited and exposed to sexualised violence, online harassment and hatred. Digital violence is considered to be just as serious as physical violence.

Norway has ratified the Istanbul Convention, which includes a requirement to carry out a national attitude-shaping campaign against violence and abuse.

Many also experience the public health service as inaccessible because of linguistic or cultural barriers. Violence is a serious equality problem that also has a heavy impact on those who are already vulnerable, or who come from backgrounds of violence. Genuine equality means that people experience health services that are equal, along with cultural and linguistic expertise in both the public health service and the justice system, and that targeted information is provided to vulnerable groups of women.

Sexual abuse is more than rape. Sexual abuse is a type of violence that affects women in particular; one in three women experiences sexual abuse at some time in her life. Early processing of the abuse can nonetheless help reduce the scope and duration of post-incident trauma for the individual. The follow up of sexual abuse is not currently sufficient.

The new Action Plan against Rape is vague and lacks substance. Rape is a crime that inflicts formidable physical and mental injuries on the person in question, but the problem is not adequately reflected in the Norwegian Government’s ranking of priorities as regards the prosecution of abuse, the post-incident follow up of victims and preventative efforts. Although the Action Plan outlines a comprehensive social issue and public health problem that affects women in particular, it has not been followed up in a satisfactory manner. None of the measures are accompanied by funding or pledges: "The measures in the action plan are to be covered under current budgetary parameters and will be implemented when financially feasible."

An exceptional number of women are exposed to gender-based violence. To counteract this, the police are allowed to help by providing protective measures. A violent assailant is often subject to bans on contact and restraining orders. Experience has nonetheless shown that restraining orders are violated – often repeatedly. A recent report indicates that enforcement of breaches of restraining orders is not good enough, and that restraining orders may therefore offer a false sense of security for women exposed to violence and threats. The police can also equip the person threatened with violence with a domestic violence alarm. Such a domestic violence alarm can be triggered by the person in question to call for help from the police. However, owing to long response time on the part of the police, and the short span of time from when the victim lays eyes on an assailant until a situation evolves, such domestic violence alarms have proven to provide a false sense of security for victims of violence. This is especially true in parts of the country that are far from the closest police station.

13 [https://blogg.hioa.no/voldsprogrammet/2019/02/05/ny-rapport-evaluering-av-besoksforbud/?fbclid=IwAR0ECY8aZ64LJue1ep8PKyLDdqQUA28UL_-ohg4vWlxud38ZRGXK4mWEro](https://blogg.hioa.no/voldsprogrammet/2019/02/05/ny-rapport-evaluering-av-besoksforbud/?fbclid=IwAR0ECY8aZ64LJue1ep8PKyLDdqQUA28UL_-ohg4vWlxud38ZRGXK4mWEro)
Protective measures: secret address code 6 and secret address code 7. In Norway, 850 women and children live at secret addresses. The measure places the burden on the person exposed to the threat and her children, and places constraints on the freedom of those involved. A fourth protective measure is a reverse domestic violence alarm. This type of protective measure requires a court order. Reverse domestic violence alarms entail electronic monitoring based on a GPS that transmits signals to the police if the perpetrator moves into a protection zone. A protection zone must be large enough so that the police can send a warning to the victim and respond before the assailant makes a move, then the police can make an arrest, if necessary. However, figures from 2018 indicate that only 4 individuals were ordered to wear a reverse domestic violence alarm, and that only 16 individuals have been ordered to wear one since they were introduced in 2013. Compared with the number women and children who live at secret addresses, this number is small. Experience has shown that among those who have been ordered to wear reverse domestic violence alarms, not one breach has been registered, nor even a single episode of violence, not a single threat nor a single attempt to find the abused. Consequently, we know that this initiative works as intended and that it means that it is the perpetrators of the violence or threat who must bear the responsibility/burden for their actions, so that women exposed to violence and threats can be spared.

It is imperative to put into place technology that is good enough to make reverse domestic violence alarms a reliable alternative to regular domestic violence alarms. Further, initiatives should be taken to compensate for the fact that women who live far from the nearest police station have less protection against violence. More frequent use of reverse domestic violence alarms may be such a compensating initiative in such cases.

This are huge gaps between the financial resources available to the various crisis centres in Norway because their funding is based on municipal finances and each municipality’s ranking of priorities determines the allocations to local crisis centres.

The Sámi Crisis and Incest Centre in Karasjok was the only one in Norway that provided services devoted to the Sámi population in particular. The Crisis Centre was closed down last year due to poor municipal finances. The closure means that closest crisis centres for women who live in Karasjok are in Hammerfest or Alta, each of which is a 4-hour drive by car. The closest sexual assault referral centre is also in Hammerfest. Experience indicates that proximity to services at a crisis centre can be absolutely decisive for whether in individual manages to get out of a violent relationship and a life-threatening situation. It is not acceptable that the quality of and access to services for women who are victims of violence in Norway depend on where in the country the women live.

The risk that a disabled girl/woman is subjected to violence by close family is four times greater than for others. Media reports have shown that violence and abuse takes place in shared housing and institutions without being alerted or reported to the police. Disability puts people at risk of being deemed untrustworthy. Research and case law suggests that perpetrators have received lenient punishments in cases involving the sexual abuse of disabled women. In cases where the victims are women with cognitive or psychosocial impairments, the courts, instead of applying the section on sexual assault, have chosen to pass a judgment in accordance with a special provision that shall give these women special protection against sexual exploitation, but the sentence is much lower.

15 https://www.vg.no/nyheter/meninger/i/4q3Rn6/tannloes-handlingsplan-mot-voldtek
The Penal Code has been amended to ensure correct application of the law, but it is not known whether this has led to any changes in practice. The CEDAW Committee has expressed concern about this and recommends evaluating the application of law in sexual assault cases.

Measures:
- In this context, Norway must fulfil its obligations under the requirements in the Istanbul Convention.
- There is a need to preserve and strengthen the specialised low-threshold services by supplementing existing cutting-edge expertise on sexual abuse.
- The Action Plan against Rape must address the challenges facing Norwegian society in a satisfactory manner.
- Reverse domestic violence alarms must be used more frequently than is the case today.
- More domestic violence alarms should also be used to compensate for the fact that women who live far from the nearest police station have less protection against violence.
- The country's crisis centres must be strengthened.
- A good offer of services must be provided to the Sámi population, and it should take into account Sámi language and culture.
- Increase the competence within the legal system regarding to the exposure of disabled people to violence and sexual abuse.

VIOLENCE AND HARASSMENT OF WOMEN AT WORK

Growing pressures at work are often at the expense of the working environment. Violence and threats are a serious working environment problem for those who work for the welfare state. It is also a major challenge in respect of women's policy, since the occupations most exposed to violence and threats are largely female dominated.

Staff who work in welfare services are in a particularly vulnerable position when it comes to having an unsafe working environment. Figures from Stami indicate that 40% of the employees in welfare services have experienced violence and threats. This burden causes those who work in welfare services to be unhappy with their jobs. They become afflicted with physical and mental problems, and many consider changing jobs.

Having good insight into and understanding work routines is necessary and, not least, decisive in order to achieve good results and prevent violence and threats in the workplace. For that reason, correct and relevant knowledge about the working environment and health must be used as the basis for preventative efforts.

As many employees are exposed to violence and threats today as 10 years ago. Consequently, this issue must continue to be high on the political agenda. A good, safe working environment helps get more people into the workforce, ensures that more people remain in the workforce for longer, and helps maintain the quality of services.

Measures:
- The Norwegian Labour Inspection Authority's efforts to counteract violence and threats will continue and be stepped up.
Employers will comply with requirements in the regulations that accompany the Working Environment Act as regards violence and threats and will spend the resources required to accomplish this.

Educational programmes will put issues related to counteracting violence and threats to employees on syllabi.

Norway must ratify the ILO Convention against violence and harassment of women at work.

HUMAN TRAFFICKING

The UN Women's Convention, the UN's Convention on the Rights of the Child, the European Convention on Human Rights, the Council of Europe Convention on Action against Trafficking in Human Beings, and the Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children (the Palermo Protocol) provide guidelines for Norway's efforts to combat human trafficking, minimise the demand for female prostitutes, and place constraints on the sex industry.

Since its first Action Plan against Human Trafficking in 2003, Norway has implemented initiatives to fight human trafficking. The ban on human trafficking was introduced into the penal code that same year to make it easier to prosecute offenders. Despite this, victims of human trafficking in Norway fail to get full access to their rights, and women and children are the most seriously affected. Meanwhile, many societies experience crisis and conflict; they are often characterised by lawlessness and a generally higher level of violence, affecting women and men alike, but women and children are especially subject to abuse. Formidable streams of refugees, domestic and cross-border alike, create new arenas for human trafficking involving women and young girls for the purpose of prostitution. In Norway, the Act prohibiting the buying of sexual services is an important policy instrument for the Norwegian government's efforts to combat human trafficking. The Act entered into effect in 2009, criminalising individuals who buy sex, but not those who sell sex. The Norwegian government’s evaluation report five years after the Act was implemented indicated that the Act is an important instrument for counteracting and fighting prostitution and human trafficking for the purpose of sexual exploitation. One important reason for legislation prohibiting the buying of sexual services is to give a strong signal that society does not accept that women’s bodies are for sale. At present, other sex industry activities are allowed, e.g. strip clubs, pornography and websites. These are arenas that recruit to prostitution at the national and international levels alike.

In 2015, the Government ramped up the work of the police in this area. With more generous budgets, the police have now introduced concerted efforts all over the country to establish special units with cutting edge expertise to take part in the struggle against human trafficking. However, there is still a need for comprehensive efforts to help women out of prostitution. The police have established a practice whereby women without residence permits or valid identity papers are deported from the country without investigating compliance with the routines for identifying victims of human trafficking. This is of great concern. Women who are victims of human trafficking and prostitution must be given better protection, and get better access to public assistance, medical help and legal counsel. Women who are identified as victims of human trafficking must not be deported without any guarantee for their safety. Access to help and protection in the long term is, in reality, severely limited, since it is in actual practice linked to the victims of human trafficking testifying against the kingpins in court cases. Inasmuch as the police dismiss most cases related to the penalty provision, very few cases ever get as far as the courtroom, meaning the victims do not get a chance to testify, so they do not get an opportunity to fulfil the conditions for a residence permit, despite their own willingness and efforts to do so.
Thus far, access to protection has been severely limited, so it is positive that the Ministry of Justice has now proposed amendments to the regulations to the Immigration Act regarding residence permits on humanitarian grounds for victims of human trafficking.

There is a need for a long-term strategy to get women away from human trafficking. Priority must therefore be given to ensuring victims of human trafficking access to medical assistance, skills development initiatives and work experience. The immigration authorities' regulations must be reviewed so that all victims of human trafficking are granted work permits.

MEASURES:

- The qualifications for permanent residence permits must be expanded so that more victims of human trafficking are guaranteed protection, regardless of whether the police file criminal charges against the kingpins. Clear criteria must be established, specifying factors other than prosecution as qualifications for establishing residence.
- The re-trafficking of women and children must be prevented. Women identified as victims of human trafficking and their children must not be deported unless there is a guarantee for their safety and assurances that they will be protected in the country that accepts them. The police must not deport women without determining whether they are victims of human trafficking.
- Funding must be earmarked so that victims of human trafficking receive access to skills development initiatives, work experience and employment. All victims of human trafficking must be granted a work permit.
- Access must be granted to adequate physical and mental medical assistance.
- Greater focus must be directed at Norwegian legislation and on men's purchases of women. Buyers are at the core of the sex industry, and human trafficking and pimps are the channels that supply women to buyers.
- It has been 10 years since the Act prohibiting the buying of sexual services was introduced. After five years, an evaluation found that young urban men had changed their attitudes to the purchase of women, that is, changed their attitude to prostitution. A new survey should be commissioned to assess men's attitude to the Act, and to gauge the Act’s impact on the market in Norway.

CHILD MARRIAGE

Nearly 650 million women who are alive today were married before the age of 18, and more than 12 million girls are child brides each year. Child marriage is currently one of the greatest obstacles to education and equality for girls – and to development in poor countries. This is a violation of children's rights, and while it is particularly prevalent in Asia and Africa, it is found in all regions.

Poverty, cultural and religious traditions and a lack of knowledge and legislation, are key structural causes underlying such practices.

The consequences of child marriage are disastrous: It deprives girls of their childhood and education, it entails serious health risks, a risk of violence and abuse, and giving birth before a girl's body is mature entails a risk of sustaining an obstetric fistula.

MEASURES:

- Recognise young girls as active participants, and not as passive recipients, in being aware of their rights to refuse child marriage.
• Ramp up health, education and social protection to improve services for young girls.
• Strengthen access to good education for girls at every level, provide support for schooling and encourage young married girls to go back to school to complete their educations.
• Ensure that girls who have dropped out of school get opportunities for alternative training and a chance to earn their own income, including access to ICT and digital services.

VIOLENCE AGAINST WOMEN FROM ETHNIC MINORITY BACKGROUNDS

Domestic violence
Many women from minority backgrounds are particularly vulnerable if they are exposed to domestic violence, especially if they have a weak social network and tenuous ties to Norwegian society.

Some instruction is provided to recently arrived immigrants on the subject of violence and rape through the introduction programme. However, this instruction is not good enough. For example, not everyone is aware of the fact that abuse and rape in wedlock are punishable offences in Norway. Individuals from minority backgrounds are also less likely than others to seek help from the support system after a rape, and few report these crimes, which may be due to a lack of language skills and inadequate knowledge about where to get help. In addition, crisis centres in Norway report that women from minority backgrounds find it difficult to define sexual violence in wedlock as rape.

Meanwhile, there are a number of private organisations and initiatives, which, in different ways, strive to strengthen the legal status of immigrant women. Efforts should be made to pave the way for the Norwegian Labour and Welfare Administration (NAV) to collaborate more closely with these groups in order for organisers with linguistic and cultural expertise to give the women custom-designed instruction - preferably in their first languages and adapted to their cultures.

There is considerable variation from one Norwegian municipality to the next in respect of the offers of help available to women who are victims of violence. This refers to the availability of crisis centres per se, but also to the services the municipalities can offer as regards providing information, advice and support for women exposed to domestic violence. Many women who are victims of violence are never identified by the support system, and those who seek help are often sent from agency to agency.

Measures:

• Efforts must be made to pave the way so that recently arrived minority women are assimilated and can build up a network outside of their family, which may have some positive ramifications in terms of domestic violence.
• Information must be provided to recently arrived immigrants, men and women alike, about what violence is.
• For that reason, better cooperation between different agencies is required, including NAV, the child welfare authorities, health care institutions and the police, so that women who fall victim to violence can be identified early and be given the help they need. It is imperative that those who work in the support system be trained in cultural sensitivity because that will help them identify the immigrant women who experience domestic violence.
Permanent residence on independent grounds for women with temporary residence permits

Many women are granted temporary residence in Norway in connection with family reunification. To qualify for permanent residence, the woman must have had a residence permit that entails the right to permanent residence for the preceding three years. If the woman is subjected to violence/abused by her husband or in-laws, she can get temporary residence on independent grounds before that time.\textsuperscript{16} The Norwegian Directorate of Immigration (UDI) is restrictive when it interprets the concept of abuse, so that violence that would probably would have been illegal under the penal code often does not qualify as abuse under the Immigration Act. This makes it a gamble for the victim of violence to break relations with the violent reference person, and to apply for residence on an independent basis. If UDI finds that the woman has \textit{not} been subjected to "sufficient violence", she may risk being deported. The women who are granted temporary residence in connection with family reunification often do not dare to apply for an independent residence permit if they have been victims of violence, for fear that they will be deported. This keeps the woman trapped in a violent relationship.

Measures:

- The residence requirement for a permanent residence permit should be reduced from three years to one year. Further, it is recommended that the threshold for being granted residence on independent grounds be reduced.
- The requirement that one must have moved away from the reference person before applying for residence on independent grounds should be lifted.

Participation in the public space and in decision-making processes

Diversity in the public space, in decision-making processes and in media helps strengthen democracy. Young women from minority backgrounds need role models with whom they can identify. Nevertheless, minority women are not well represented in Norway's public sphere. It is necessary to strive to ensure that minority women are recruited to participate in political decision-making processes, in the media and in the public sphere otherwise, so that minority women and girls have good role models to pattern themselves after and identify with, and so that the public sphere better reflects the general public.

Measures:

- Minority women must be recruited to participate in political decision-making processes, in the media and in the public sphere otherwise.

A PEACEFUL AND INCLUSIVE SOCIETY

Norway has a clear and important role to play in strengthening human rights activists. Norway was a prime mover behind the resolution that the UN General Assembly adopted in 2013, and Norway has provided important support afterwards. Female human rights activists are working under growing

\textsuperscript{16} cf. the Act concerning the entry of foreign nationals into the kingdom and their presence in the realm (The Immigration Act) §53.
pressure in many parts of the world, and increasingly falling victim to violence, abuse and murder. This should be rendered more visible.

Norway will intensify its efforts to work for and beside female human rights activists. The Action Plan entitled ‘Freedom, Empowerment and Opportunities’ is mentioned as part of the sub-chapter ‘Measures for Women, Peace and Security’. It can stand alone since it has five target areas that go far beyond women, peace and security.

Measures:

- The 5 areas in the Action Plan and the measures under each of them must be rendered visible.
- Budget chapters in the Norwegian National budget are not possible to “read” to get any detail on how priorities are being followed up or if there is any strategic thinking on annual use of committed funding for international development connected to gender equality and women’s empowerment. Lack of transparency and possibility to trace.
- The importance of sexual and reproductive health and rights globally, which measures Norway contributes to and their priorities in Norwegian foreign and development policy, must be rendered visible.
- Funding and inclusion of gender equality and women’s empowerment in international development funding targeting private sector, business development, tax systems in developing countries and also the energy sector has very low visibility and inclusion. At the same time, that is where large amounts of funding is being targeted.
- It should be highlighted that the Norwegian authorities consider it important to work with and through religious players to create positive change and equality.
- The importance of working together with a wide range of civil society organisations should be underscored at the national and international levels alike.
- In the context of Norwegian development cooperation policy, civil society must be given the latitude needed to operate as an influential force in respect of the country's authorities, leading to positive change and more equality.
- In 2016, at the same time as we got the new Action Plan – Freedom, Empowerment and Opportunities, Norway's support for women's rights and equality was reduced. This is in stark contrast to what the Action Plan says about intensifying efforts. In connection with the national budget, the impression is given that efforts are growing, but in some cases, this is merely a question of budgetary items being moved to new chapters and then being relaunched under the heading of the "women's billion". This is not generally fresh new funding, but rather existing funding that is being repurposed.
- A large part of Norwegian development funding goes into big funds, without that necessarily ensuring the best results or effects. From the perspective of gender equality, it must be seen as a redistribution that reflects a mindset intended to give women themselves a greater say and more control over which funding is best for engendering the desired change and greater equality.
- The Norwegian efforts to promote equality focus far too little on so-called "root causes", such as masculinity, and cultural and traditional reasons. Links must be established to proprietary resources and fresh funding. Such efforts must not be paid for from funds that are already devoted to women and equality, since they are already inadequate.
- The LIKE programme, which was launched along with the Action Plan entitled Freedom, Empowerment and Opportunities, has been an internal programme in the ministry for efforts aimed at selected countries. Civil society is not included in any way, neither on the part of
Norway nor in the countries the Norwegian authorities have selected. LIKE must be built out to include civil society from both sides and include possibilities for participation and cooperation.

THE GENDER EQUALITY PERSPECTIVE IN INITIATIVES AIMED AT CLIMATE AND THE ENVIRONMENT

The gender equality perspective is lacking in Norwegian climate and environmental policy, and it is also not a visible part of either the Norwegian or the international debate and implementation of policy. Efforts are fragmented and small-scale and related *inter alia* to minor international projects associated with female small farmers and food safety. Girls and women are impacted by climate changes more severely than men and boys. This is not reflected clearly enough in initiatives that should be part of Norwegian policies and, not least, be part of the development of policy initiatives. This must also be associated more directly with humanitarian efforts and be part of the framework parameters and reporting mechanisms. Moreover, it must be seen in the light of sexual and reproductive health and rights, female human rights activists, violence against girls and women, and economic development and rights, to mention just a few areas.