



Icelandic Human Rights Centre
Icelandic Women's Rights Association

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MANNRÉTTINDASKRIFSTOFA ÍSLANDS ICELANDIC HUMAN RIGHTS CENTRE

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Icelandic Human Rights Centre

promotes human rights by collecting information on and raising awareness of human rights issues in Iceland and abroad.

ICEHR serves a monitoring role and has, since its inception, commented on dozens of bills of law and public policy and provided information to international monitoring bodies on the state of human rights in Iceland.

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KVENRÉTTINDAFÉLAG ÍSLANDS

Kvenréttindafélag Íslands
Icelandic Women's Rights Association

has fought for women's rights and gender equality since 1907. IWRA has a representative on the Gender Equality Council of Iceland and is a founding member of the Icelandic Human Rights Centre.

IWRA actively cooperates with partner organizations in the Nordic and Baltic states, and has been a member of the International Alliance of Women (IAW) since 1907.

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**Notes on the Government of Iceland's
Seventh and Eighth Report on the
Implementation of the Convention
on the Elimination of All Forms of
Discrimination Against Women**

2016

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Introduction

The government's report provides an extensive overview of national legislative and administrative measures that are significant to the implementation of the Convention.

In recent years, several important steps have been taken by the Icelandic government to address discrimination against women. The most important step was the passing of a new Act on Equal Status and Equal Rights of Women and Men (Gender Equality Act) in 2008, providing a comprehensive update of legislation dealing with gender discrimination and increasing the powers of the government monitor of gender issues, the Centre for Gender Equality. In 2009, amendments to the General Penal Code made the purchase of sexual services punishable by law, as well as the advertising of prostitution and the profiting from the prostitution of others. The selling of a person's own body remains decriminalized in Iceland. In 2010, amendments to the Restaurant, Guesthouse and Entertainment Act effectively criminalized strip clubs, when it became illegal for employers to profit from the nudity of their employees. In 2010, amendments to the Public Limited Companies Act and the Private Limited Companies Act mandated a gender quota in the boards of companies with 50 or more employees. In 2011, new gender sensitive National Curricula were written for compulsory and secondary schools. In 2012, the government introduced the Equal Pay Standard, an ISO certification system which can confirm that women and men working for the same company are paid equal wages and enjoy equal terms of employment for the same jobs or jobs of equal value. In 2015, a new State Budget Act was passed mandating that the official government budget must be gender responsive.

This report lists the concerns of the Icelandic Human Rights Centre (IHECR) and the Icelandic Women's Rights Association (IWRA) with the Icelandic government's gender equality legislation, policy and funding, as well as our recommendations.

Some of our concerns and recommendations for Icelandic action in this report, not exhaustive, include:

ICEHR and IWRA would like to express their concern that the government is in non-compliance with the Gender Equality Act. The last Government Equality Action Plan was valid until the end of 2014, and a new action plan has not been accepted, as stipulated by the Gender Equality Act.

ICEHR and IWRA express concern with lack of a current government action plan against domestic violence and sexual violence. The last valid government action plan against domestic and sexual violence expired at the end of 2011. We affirm that without an action plan spanning multiple years, efforts by the government to combat domestic and sexual violence lack both secure funding and focus.

ICEHR and IWRA recognize that in 2013, the government implemented an ambitious action plan against trafficking in human beings valid from 2013–2016. However, very little funding has been allotted to implementing this plan. We encourage the Icelandic government to adequately fund the action plan to fight human trafficking.

ICEHR and IWRA express concern with the lack of funding to Parental Leave Fund. One of the pillars of the equal status of women and men in Icelandic society is our parental leave, which is equally divided between the two parents. The length of paternity leave taken by men has dropped in recent years, since the Parental Leave Fund lowered its disbursements

ICEHR and IWRA recommend that the government continue its revision of the National Curricula of compulsory and secondary schools, and make gender studies a mandatory course at all levels.

ICEHR and IWRA encourage the Icelandic government to review the legislation on abortion. The current legislation from 1975 allows abortion, but contingent on approval by health workers. We encourage the Icelandic government to affirm women's sexual rights by guaranteeing women's right to choose, without their choice being contingent on an external permission.

ICEHR and IWRA express their concern that a bill has been submitted to the 2015–2016 parliamentary session, legalizing altruistic surrogacy. Very little in-depth and balanced discussion has taken place in Icelandic society on the ethical, legal, human rights and other implications of surrogacy. In view of this ICEHR and IWRA encourage the Icelandic government to not legalize surrogacy, whether or not for altruistic or commercial reasons.

ICEHR and IWRA are concerned that lack of financial resources is negatively impacting the government's work in guaranteeing the equal status of women and men. We would like to highlight the fact that the Centre for Gender Equality, the government institution charged with carrying out and monitoring compliance with the Gender Equality Act, has not been adequately financed in the past seven years.

Lack of financing has affected work on gender equality at all levels of government and all government institutions in the past seven years. We encourage the Icelandic government to fully commit to the equality of women and men, by adequately funding all equality initiatives and legally mandated projects within government institutions.

Article 1. Discrimination

The Icelandic Constitution states that “everyone shall be equal before the law and enjoy human rights irrespective of sex, religion, opinion, national origin, race, colour, property, birth or other status.” It also sets forth that “men and women shall enjoy equal rights in all respects.”

The Gender Equality Act contains a definition of both direct and indirect gender based discrimination, gender based violence, gender-based harassment, sexual harassment, gender mainstreaming and affirmative action. Overall, the Gender Equality Act is in compliance with CEDAW’s stipulations.

The Gender Equality Act prohibits discrimination on grounds of gender, but, except for the aforementioned stipulation in the Icelandic Constitution, Iceland has no comprehensive legislation on discrimination, only a few stipulations here and there in various acts.

The CEDAW Convention has still not been implemented into domestic law. One consequence of the CEDAW Convention not being incorporated into domestic law is that the general public, parliamentarians, and even those working for institutions and companies as gender specialists, remain uninformed about Iceland’s international commitments to ensure gender equality, and public debate about gender equality legislation is affected.

ICEHR and IWRA urge the Icelandic government to incorporate the CEDAW Convention into national law, and to educate the Icelandic public on our international commitments as regards gender equality.

Article 2. Policy Measures

Legislation on Gender Equality

The Act on the Equal Status and Equal Rights of Women and Men, No. 10/2008 (Gender Equality Act), was passed by Parliament on 6 March 2008, replacing the Gender Equality Act, No. 96/2000. This legislation was a great improvement to the legislative framework on gender equality in Iceland and overall, the Gender Equality Act is in compliance with CEDAW's stipulations.

However, ICEHR and IWRA reiterate our view that gender equality measures could be strengthened further. It has also become increasingly apparent that the institution tasked with administering the Gender Equality Act, the Centre for Gender Equality, is unable to adequately fulfill many responsibilities, due to budgetary constraints, lack of staff, and inconvenient location.

Centre for Gender Equality

The Centre for Gender Equality is tasked with ensuring that public institutions, municipalities and private actors fulfill the Gender Equality Act. The Centre provides counseling on gender equality issues to the government and other actors, monitors gender equality in society, works on preventive measures and research, and acts as a watchdog, monitoring public and private actors to ensure that they comply with the Gender Equality Act.

Due to the increased responsibilities and powers of the Centre for Gender Equality following the enactment of the

Equality Act in 2008, its budget and staff (from 6 to 8) were increased. However, following the financial collapse in September 2008, its budget was cut despite drastic inflation in costs and the increased responsibilities of the Centre.

The Centre for Gender Equality has been able to supplement its funding by outside grants, often awarded to specific projects. It is unfortunate that the government institution tasked with monitoring and accomplishing the core equality work of the government should have to rely on outside competitive funds.

Despite a slight increase in government funding in the past two years, we remain concerned that the Centre is insufficiently funded to fulfill its fundamental responsibility, i.e. to ensure that all actors, be they public and private, fulfill the Gender Equality Act. The number of staff members has again been cut from 8 to 6, but the duties and responsibilities of the Centre have not been decreased correspondingly.

We are also concerned that the location of the Centre for Gender Equality hinders its effectiveness in fulfilling its responsibilities. The Centre is located in the municipality of Akureyri, a town in the north of the country, a five hour drive from the capital of Reykjavík. The Centre for Gender Equality plays a vital role in Icelandic society, both as a monitor and as a participant in public discussion about gender equality. By locating this vital institution far from the center of power in the capital, its effectiveness is diminished and its voice muffled.

ICEHR and IWRA encourage the Icelandic government to adequately fund the Centre for Gender Equality and increase accessibility to its services.

Lack of a Government Gender Equality Action Plan

We express our concern that the Icelandic government is in non-compliance with the Gender Equality Act, operating without a legally mandated action plan on gender equality.

According to Article 11 of the Gender Equality Act, the Minister of Social Affairs and Social Security shall, within one year following a general election, present to the Parliament a motion for a parliamentary resolution on a four-year Gender Equality Action Plan. The last general election in Iceland was in April 2013 and an action plan should therefore have been submitted to Parliament by April 2014. An action plan still has not been submitted and the former Gender Equality Action Plan expired in December 2014. Thus, the government has operated for at least one year without a current Gender Equality Action Plan.

ICEHR and IWRA urge the Icelandic government to pass a Gender Equality Action Plan.

Gender Equality Representatives and Gender Mainstreaming

According to Article 13 of the Gender Equality Act, each ministry shall have a gender equality representative with expert knowledge of gender equality issues. The gender equality representative shall deal with and monitor gender equality work in the policy areas of the ministry in question and its institutions, especially the work mandated by Article 17 of the Gender Equality Act, the work on gender mainstreaming in the fields administered by the ministry.

Funding was allocated to fulfill the requirements of the Gender Equality Act that the ministries appoint gender equality representatives, but, following the financial collapse of September 2008, this funding was cut and ministries were required to find funding for the position of the gender equality representatives in other areas. This lack of funding has resulted in the fact that only one of the ministries currently has a gender equality representative working full-time. Specialists already working at other ministries have been appointed to a part-time position as gender equality representatives, this duty added to their other responsibilities.

We express our concern that the gender equality representatives of the Icelandic ministries do not work on gender mainstreaming in the fields administered by their respective ministries. This lack of action on gender mainstreaming is a direct result of the lack of funding for hiring full-time gender equality representatives. This lack of funding means that the government has been unable to fulfill Article 17 of the Gender Equality Act, to work on gender mainstreaming in all areas of government.

ICEHR and IWRA encourage the Icelandic government to adequately budget for gender equality representatives in government institutions.

ICEHR and IWRA encourage the Icelandic government to work on gender mainstreaming in all areas of government.

Gender Responsive Budgeting

ICEHR and IWRA welcome new legislation passed in 2015, mandating that future government budget proposals be gender responsive, written with analysis of its effect on the equal status of women and men.

ICEHR and IWRA are hopeful that this new legislation will strengthen gender equality in Icelandic society in the future.

Article 3. Guarantee of Basic Human Rights and Fundamental Freedoms

Iceland has signed but not yet ratified Protocol 12 to the European Convention on Human Rights and Fundamental Freedoms, which contains a general prohibition of discrimination.

ICEHR and IWRA urge the Icelandic government to ratify the Protocol and incorporate it into national law as a means to strengthen the limited anti-discrimination legislation in force in the country.

There is no national human rights institution in Iceland. In the absence of a national human rights institution, its role has been assumed by ICEHR, an independent non-governmental institution, albeit mostly funded by the state.

ICEHR and IWRA urge the Icelandic government to establish a national human rights institution, to operate in compliance with the UN Paris Principles.

Article 4. Special Measures

Gender Quotas in Government Boards

According to Article 15 of the Gender Equality Act, government committees which consist of three or more members, both state and municipal, have a set quota of 40% of either gender.

When the law entered into force in 2008, 43% of government committees were in compliance with this article as opposed to 76% in 2014. We are concerned that 24% of governmental committees remain in non-compliance with the article mandating gender quotas.

We are also concerned that at least one governmental committee feels that it does not need not comply with the Gender Equality Act. In September 2010, a government committee was appointed and tasked with evaluating the qualifications of applicants to the Supreme Court. The members of the committee are appointed by the Supreme Court, the Parliament, the Judicial Council and the Icelandic Bar Association, and all four actors appointed men to the committee. When asked to justify these appointments in 2010, the Supreme Court, Judicial Council and the Icelandic Bar Association claimed that they did not need to follow the Gender Equality Act, that legislation relevant to the court system superseded legislation on gender equality.

ICEHR and IWRA are concerned with the non-compliance of government committees to the act on gender quotas, and point out that this non-compliance may affect the work of these committees. In 2015, only 1 woman served on the Supreme Court

out of 11 justices. We point out that in September 2015, the all-male committee tasked with evaluating the qualifications of Supreme Court justices recommended a man for a new position to the Supreme Court.

ICEHR and IWRA affirm that no actors, whether governmental or private, are exempt from the Gender Equality Act.

Gender Quotas in Boards of Corporations

In 2010, amendments to the Public Limited Companies Act and the Private Limited Companies Act mandated that boards for companies with 50 employees or more have a set quota of 40% of either gender.

We welcome this legislation, but express concern that the gender quota law only applies to companies with 50 employees or more, an especially high number considering the average size of an Icelandic company. In 2014, 296 companies had 50 or more employees, while 26,505 companies had less than 50 employees.

According to article 18 of the Gender Equality Act, companies and institutions with 25 employees or more are required to adopt gender equality plans or mainstream gender equality into their personnel policy.

ICEHR and IWRA encourage the Icelandic government to amend the legislation on gender quotas in the boards of corporations, so that it applies to companies with 25 employees or more.

Article 5. Structural Changes, Sex Role Stereotyping and Prejudice

ICEHR and IWRA welcome the increased discussion about feminism and the increased awareness of the importance of gender equality in Icelandic society.

In the past decade, there has been a great increase in the number of NGOs which focus on gender equality, especially NGOs which deal with the intersectionality of gender discrimination. Women of Multicultural Ethnicity Network – W.O.M.E.N. in Iceland was founded in 2003, Trans Iceland in 2007, the first slutwalk took place in Reykjavík in 2011, Rótin – Association of Women with Addictions was founded in 2013, Intersex Iceland in 2014, and Tabú – Network for Women with Disabilities in 2014. This past decade has also seen an explosion of the formation of traditional feminist groups. The Feminist Association of Iceland was founded in 2003, the Feminist Association of the University of Iceland in 2007, the Feminist Association of the Vestfjords in 2013, and the Feminist Association of the University of Reykjavík in 2015.

The awakening of feminist sensibilities has been apparent within the compulsory and secondary school system. Students of many Icelandic secondary schools have also formed their own feminist clubs in the past few years. The first secondary school feminist club was founded in 2012, and now students have formed feminist clubs in at least 12 of the 33 secondary schools in the country. In 2014, these students founded their own Federation

of High School Feminist Clubs. To date, students at at least one compulsory school have formed their own feminist club.

National school curricula are gender sensitive and equality has been one of the six pillars of compulsory and secondary education since 2011. Classes in gender studies and feminism have been offered in the majority of secondary schools in the country.

ICEHR and IWRA encourage the Icelandic government to finance the organizations of the women's movement at least on a par with other organizations in civil society so that feminism has an impact and true gender equality is attained in society.

ICEHR and IWRA encourage the Icelandic government to ensure higher participation of women's organizations, as dialogue partners, as critical reviewers and as actors of change in developing a transparent policy on gender equality, a long-term engagement in sustainable development both at national and global levels.

ICEHR and IWRA encourage the Icelandic government, in accordance with CEDAW and the Beijing Platform for Action, to give women's organizations and civil society networks economic and social opportunities to participate in policy formulations at local, national and international level.

ICEHR and IWRA encourage the Icelandic government to explore making gender studies a required subject, taught both at compulsory and secondary level.

Article 6. Exploitation of and Trafficking in Women

Prostitution, Strip Clubs and Trafficking

In 2009, changes to the General Penal Code made the purchase of sexual services punishable by law, as well as the advertising of prostitution and the profiting from the prostitution of others. The selling of a person's own body remains decriminalized in Iceland. In 2010, amendments to the Restaurant, Guesthouse and Entertainment Act effectively criminalized strip clubs, when it became illegal for employers to profit from the nudity of their employees. These changes enabled authorities to close strip clubs that had been linked with prostitution and human trafficking.

ICEHR and IWRA welcome these changes to the Icelandic legislation, but are concerned that the implementation of these laws remains uneven and ineffectual.

The first prosecutions based on the changes to the General Penal Code which criminalized the purchase of prostitution took place in 2011. The courts in Iceland decided that defendants, fined or sentenced for the purchase of prostitution, remain anonymous and their cases are not published on the internet as other rulings and judgements by municipal courts and the Supreme Court. We express concern that by granting anonymity to sex buyers, the stipulation banning the purchase of sexual services is rendered ineffective; at least it cannot be regarded to have any preventive effect.

Since the purchase of prostitution was made illegal, the number of cases investigated by the police has varied greatly between years. These shifts in cases each year can be traced to the fact that cases of prostitution are investigated at the instigation of the police, and, therefore, only if there is willingness within the police.

There is severe lack of resources for women who want to escape prostitution. Between 2012 and 2014, Kristínarhús, a shelter for trafficked women and women trying to leave prostitution was opened. It closed after only two years, partly due to lack of funding.

A report issued by the National Commissioner of the Icelandic Police in 2015 states that there are indications that prostitution in Iceland is increasing, especially in Reykjavík and the greater metropolitan area.

We remain concerned that the law banning employers from profiting from the nudity of their employees is not being actively enforced by the authorities. In 2013, independent reporting by the Icelandic news media revealed that despite the ban of strip clubs, several clubs in Reykjavík continued to demand the nudity of their employees, claiming that they were not employees, rather “independent contractors”. The police only investigated some of these so-called “champagne clubs”, one of which was (and is) located only 110 meters from Parliament, following intense media attention.

A report issued by the National Commissioner of the Icelandic Police in 2015 states that at least five “champagne clubs” operate in Reykjavík and the greater metropolitan area. The majority of the women working at these clubs are foreign, and it is unknown whether or not they were trafficked to the country. The report states that there are indications that cases of trafficking might be connected to these clubs.

We encourage the Icelandic police to actively investigate Icelandic clubs and restaurants to see if they are illegally profiting from the nudity of their employees, and to actively monitor the health and well-being of the women who work there, as well as investigate whether these women are victims of trafficking.

We recognize that in 2013, the government implemented an ambitious action plan to fight human trafficking between 2013–2016. However, very little funding was allocated to implementing this plan. The only action effectively put into place has been the education on trafficking for police, social services, health care, labor unions, NGOs and others. Over 30 courses have been held and more than a thousand members of staff of the aforementioned organizations have been educated.

ICEHR and IWRA encourage the Icelandic government to increase funding to the police to investigate cases of prostitution, and we encourage the National Commissioner of the Icelandic Police to make sure that prostitution is actively investigated in all police districts in the country.

ICEHR and IWRA encourage the Icelandic government to increase funding to combat trafficking and to make sure that women victims of trafficking receive help and justice.

Violence Against Women

The General Penal Code penalizes all forms of violence against women. The Code recognizes marital rape and female genital mutilation as a crime, as well as sexual harassment and other forms of sexual violence. There is no gender specific stipulation in the General Penal Code on domestic violence, but

according to Article 70 Paragraph 3, it leads to a more severe penalty if an offence is committed against a man, woman or child in a close relationship to the perpetrator, the offence, due to this relationship, being considered particularly heinous.

However, amendments need to be made to the General Penal Code on stipulations regarding harassment, to ensure effective redress against cyber-related crimes, such as internet stalking and non-consensual pornography (“revenge porn”). ICEHR and IWRA recommend that the Parliament addresses online harassment and online violence against women.

ICEHR and IWRA express concern with lack of a current government action plan against domestic violence and sexual violence. In 2006, the government published an action plan against domestic violence and sexual violence, an action plan valid up to the end of 2011. Since that action plan expired, no other action plan has been proposed. We affirm that without an action plan spanning multiple years, efforts by the government to combat domestic and sexual violence lack both secure funding and focus.

We express our concern with the high number of dismissals of charges of rape and sexual violence by the State Prosecutor and with the low number of convictions in cases of rape and sexual violence. In 2013, EDDA – Center of Excellence and the Ministry of the Interior released a report mapping out how rape cases, reported to the police in 2008–2009, fared in the judicial system. Of the 189 cases of sexual violence reported to the police in those two years, 88 were referred to the State Prosecutor, who issued 31 charges against individuals, of which 23 were convicted. These low figures are even more striking when compared with numbers from the Rape Crisis Centre in Landspítalinn which reported 248 visits of victims of sexual violence during that time period, and numbers from Stígamót – Education and Counseling Center for

Survivors of Sexual Abuse and Violence where individuals sought counseling for the during that same period regarding 463 new cases.

We welcome the increased enforcement of changes to the General Penal Code made in 2011, whereby the police is authorized to file for a restraining order against perpetrators of domestic violence, on behalf of their victims. Cases on restraining orders filed by the police have drastically increased in recent years. In 2011, only 2 cases of restraining orders filed by the police came before the Supreme Court, 3 cases in 2012, 7 cases in 2013, 8 cases in 2014, and 26 cases in 2015.

We welcome the efforts of the Commissioner of the Reykjavík Metropolitan Police to train officers in dealing with domestic violence in recent months and recognize the benefits of the new intersectional approach to domestic violence launched in 2015 (imported from the Suðurnes Police district where the Commissioner served before), an approach which relies on cooperation between the police, social services, child services and health services. The Reykjavík Metropolitan Police also instituted changes in its organization in 2015, whereby more emphasis is placed on human trafficking and sexual violence.

We express our hope that recent changes in the approach of the Reykjavík Metropolitan Police to sexual violence and domestic violence complaints and cases, a model now in place in the Metropolitan and Suðurnes police districts, signals a change in the approach of other police districts to gender based violence.

We also express hope that the emphasis placed on gender based violence in the past year heralds a change within the police in dealing with gender issues both externally and internally. Women are underrepresented in the Icelandic police force, and the number of women police officers who have been sexually harassed is high. The most recent gender figures released by the

National Commissioner reveal that in February 2014, women made up less than 13% of the police force. Out of 682 police officers, 87 were women. According to a report commissioned by the National Commissioner of the Icelandic Police in 2013, 31% of women police officers have been sexually harassed while working. The harassers were colleagues, superior officers and members outside the police force.

ICEHR and IWRA urge the Icelandic government to issue an action plan against domestic violence and sexual violence.

ICEHR and IWRA encourage the Icelandic government to amend the General Penal Code to adequately address online harassment and online violence against women.

ICEHR and IWRA encourage the Icelandic government to review the status of women and men within the police force, to see what action can be taken to increase the number of women serving within the police and guaranteeing the safety of women police officers.

Violence Against Women with Disabilities

We celebrate the activism of Tabú – the informal space for self-identified disabled women activists, a group which has led the way in the past two years in pointing out the intersectional issues of women’s rights and the rights of people with disabilities. We also recognize Stígamót – Education and Counseling Center for Survivors of Sexual Abuse and Violence, which began offering counseling specifically tailored to disabled survivors of sexual abuse and violence in 2013.

While NGOs and activists have been in the forefront of driving the public discussion about violence against disabled women, government response has been lacking. In 2013, the Ministry of Welfare released a report detailing the various representations and instances of violence against disabled women in Icelandic society. Little action has been taken by the state following the publication of this report.

No current action plan dealing with violence against women with disabilities exists. This lack of a coordinated action plan and procedures complicates the way various caregivers and institutions deal with cases of violence and hinders their successful prosecution.

ICEHR and IWRA urge the Icelandic government to issue an action plan against domestic violence and sexual violence, a plan which is sensitive to the needs and well being of women with disabilities.

Violence Against Immigrant Women

Few studies have been done detailing violence faced by immigrant women in Iceland.

One study commissioned by the Ministry of Social Affairs in 2010, interviewed representatives from eleven NGOs which offer assistance to women victims of domestic abuse. The consensus by respondents was that immigrant women often lack knowledge about resources available and avoid seeking help for abuse for fear of deportation. Respondents emphasized the lack of financial resources to offer the services of interpreters and lack of services outside of the Reykjavík metropolitan area.

The number of immigrant women seeking help from the Women's Refuge in Reykjavík has been rising. In 2009, 25% of the women who stayed at the shelter were immigrant women, but in 2014 they made up 32% of residents. In 2014, women from 35 countries stayed at the Women's Refuge, a higher ratio of immigrant women than in society. This disparity can probably be traced to the fact that immigrant women do not have the same family safety net as native Icelandic women.

A study commissioned by the Women's Refuge in 2009 found that there was a disparity in the experience of immigrant women coming from countries inside the European Economic Area (EEA) and women coming from countries outside the EEA who have not obtained a permanent residence permit or become Icelandic citizens. The situation of women from countries within EEA is easier, since residence and work permits of women from outside the EEA are in some cases dependent on their partner.

We express our concern that the Multicultural and Information Centre, the government institution which guards the interests of immigrants in Iceland, is located far from the capital, in the town of Ísafjörður, in the northwest of Iceland. This important institution needs to be located close to other key institutions in the country, in the capital of Reykjavík where the majority of the population resides.

ICEHR and IWRA encourage the Icelandic government to instigate research into violence faced by immigrant women in Iceland.

ICEHR and IWRA urge the Icelandic government to issue an action plan against domestic violence and sexual violence, a plan which is sensitive to the needs and well being of immigrant women.

ICEHR and IWRA encourage the Icelandic government to adequately fund the Multicultural and Information Centre and increase accessibility to its services.

ICEHR and IWRA encourage the Icelandic government to change Icelandic legislation so that work and residence permits are not dependent on the status of partners. We consider this legislative change as necessary to ratify the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention).

Lack of Services for Victims of Sexual and Domestic Violence Outside of Reykjavík and the Greater Metropolitan Area

There is only one shelter for victims of domestic violence in Iceland, located in Reykjavík. The Women's Refuge is a non-profit organization founded by the women's movement in 1982. The Women's Refuge is financed by donations from the public and financing by the state and municipal authorities. Victims of domestic violence who live outside of Reykjavík and the greater metropolitan area can seek shelter there, but it may cause them considerable inconvenience.

There are only two hospitals in the country which offer specialized receptions and services to victims of sexual violence, Landspítalinn in Fossvogur, Reykjavík and Akureyri Hospital in Akureyri. We express concern that specialized services for victims of sexual violence is lacking outside those two areas. We suggest that such receptions and services should be offered by every clinic and health center run by the state.

Counseling for victims of sexual violence is offered by four NGOs in the country, Stígamót and Drekaslóð in Reykjavík, Aflið in Akureyri and Sólstaðir in Ísafjörður. Stígamót also provides service for individuals outside of Reykjavík, with biweekly visits of counselors to the townships of Egilsstaðir and Patreksfjörður, as well as visits to townships who request their services. Stígamót also counsels individuals living outside of the greater metropolitan area by telephone, Skype and on-line conversations. However, we express concern about the lack of resources for victims of sexual violence outside of Reykjavík who seek counseling and recommend that the two NGOs located outside of Reykjavík, receive adequate funding to carry out their operations as well as the ones operating in the greater metropolitan area. We finally suggest that the clinics and health care centers run by the state countrywide should offer counseling for victims of sexual violence.

ICEHR and IWRA encourage the Icelandic government to ensure equal access to counseling and services to victims of domestic and sexual violence, for example by making such services accessible at all health care centers.

ICEHR and IWRA encourage the Icelandic government to actively and adequately support NGOs providing counseling for victims of sexual violence.

Istanbul Convention

Iceland has signed but not yet ratified the Istanbul Convention.

ICEHR and IWRA urge the Icelandic government to ratify the Istanbul Convention and incorporate it into national law as a means to strengthen legislation against violence against women and domestic violence.

Article 7. Political and Public Life

Iceland has managed to reach gender parity in elections without the use of gender quotas. Gender quotas are utilized by some parties, but not all, and are not mandated by legislation.

We express our concern with the severe lack of women in the Supreme Court. Out of 9 justices, only 1 woman serves as justice at the Supreme Court in January 2016.

We express our concern with the severe lack of women serving as police officers. In February 2014, women made up less than 13% of the police force. Out of 682 police officers, 87 were women. The ratio of women to men in positions of authority was even lower. Out of 44 superintendents, only 1 was a woman, and out of 160 inspectors, only 8 were women.

We welcome the introduction of gender quotas on corporate boards, but reiterate our position that gender quotas should apply to boards of companies with 25 employees or more, rather than companies with 50 employees or more, as is currently mandated.

ICEHR and IWRA encourage the Icelandic government to explore ways to increase the number of women on the Supreme Court, to increase the number of women in the police force, and to increase the number of women on the boards of companies with 25 employees or more.

Article 8. International Representation

Women are still underrepresented in the Icelandic Foreign Service. In January 2016, 29 men served as ambassadors abroad and 13 women, a gender ratio of 69/31.

ICEHR and IWRA encourage the Icelandic government to increase the number of women serving in the Icelandic Foreign Service.

Article 10. Education

In 2007, a teacher at Borgarholtsskóli, a secondary school in Iceland, began offering students an optional course in gender studies. Since then, she has trained 60 teachers to teach gender studies at the secondary school level, in classes organized by the Union of Icelandic Teachers, and offered short training sessions to hundreds of teachers at the compulsory school level. This training has given teachers the inspiration and tools necessary to organize their own gender studies courses and integrate gender studies into the teaching of other subjects. Since 2007, optional courses in gender studies have been offered in 23 out of 33 secondary schools in Iceland, at the instigation of teachers.

Since 2011, equality has been one of the six pillars of educational approaches in the Icelandic school system. In 2011, new National Curricula were instituted for schools on the compulsory and secondary level in Iceland. The six pillars of education are: literacy; sustainability; democracy; equality; health and welfare; and creativity.

In 2011, the Centre for Gender Equality issued a report showing a severe underrepresentation of women in history books written for Icelandic compulsory schools. In the 11 history books taught to children aged 10 to 12, only 1-20% of historical individuals named in the text were women. The report highlighted that the gender ratio was worst in the most recent books published, the series *Sögueyján*, or *History Island*, two books detailing the history of Iceland between 870 and 1900. In those books, women were only 1% of named figures in Icelandic history.

ICEHR and IWRA recommend that the Icelandic government make gender studies mandatory at the compulsory and secondary school level. It is through education that sustainable social change and gender equality can be put into effect.

ICEHR and IWRA recommend that the Icelandic government review textbooks taught at the compulsory and secondary school level, and make sure that these books offer an equal representation of women and men.

Article 11. Employment

The adjusted gender pay gap in Iceland in 2008–2013 was 7.6%.

ICEHR and IWRA encourage the Icelandic government to continue its work to eradicate the gender pay gap.

The Equal Pay Standard

ICEHR and IWRA welcome the work that the Icelandic government has done in developing the standard ÍST 85:2012 – Equal Pay Management System, an ISO certification system, written in cooperation with the Icelandic Confederation of Labour and Federation of Icelandic Industries, which can confirm that women and men working for the same company are paid equal wages and enjoy equal terms of employment for the same jobs or jobs of equal value.

ICEHR and IWRA encourage the Icelandic government to continue its work to fully implement the Equal Pay Standard and to introduce the standard to the international community.

Gender Equality Policies

As discussed above, the Gender Equality Act requires that institutions or companies employing 25 or more employees prepare equal rights plans on wages and general employment terms or provide in particular for equality between women and men in their employment policies.

It is the responsibility of the Centre for Gender Equality to make sure that companies are in compliance with these requirements, and they may impose a daily fine on non-compliant companies. It is of concern that a lack of staff and adequate funding for the Centre for Gender Equality has impeded this monitoring role.

ICEHR and IWRA encourage the Icelandic government to adequately fund the Centre for Gender Equality.

Immigrant Women in the Labor Market

A report issued by the National Commissioner of the Icelandic Police in 2015 states that it has received reports about the trafficking of workers in the labor market. However, no further studies of trafficking of immigrant workers in Iceland have been published, nor a gender analysis of these cases.

ICEHR and IWRA encourage the Icelandic government to instigate research into the status of immigrant women in the labor market, and the scope of human trafficking in Iceland.

Parental Leave

Icelandic parental leave is structured in such a way that 3 months are allotted to each parent and non-transferable, and 3 months are considered joint parental leave, to be divided as the parents see fit. By dedicating 3 months to the second parent, i.e. fathers in heterosexual relationships, and by making those three months non-transferable, Iceland has ensured that the great majority of Icelandic men take paternity leave. Since 2007, around 90% of Icelandic fathers have taken paternity leave, following the birth of their children.

In 2004, a ceiling was instituted for the amount of disbursements paid by the Parental Leave Fund. In 2004, the ceiling was high enough to affect only a fraction of the fathers, but in 2010 the ceiling was lowered so that just under half of all fathers were affected. The result of these lower disbursements from the Parental Leave Fund is that the number of parental leave days taken by fathers has plummeted. In 2008, men took on average 103 days in paternity leave. In 2012, the average paternity leave was 79 days, or a month shorter.

We express our concern with the lack of guaranteed childcare for children aged 9 months to 2 years. Parents are only guaranteed 9 months of parental leave, and children are only guaranteed daycare from the age of 2. The care of children in the gap between the expiration of parental leave and start of daycare is often assumed by mothers, requiring that women either start working part-time or withdraw completely from the labor market. This childcare gap thus adversely affects the status of women in the labor market and in society.

ICEHR and IWRA encourage the Icelandic government to adequately fund the Parental Leave Fund, raise the maximum disbursements and lengthen the parental leave.

ICEHR and IWRA encourage the Icelandic government to bridge the gap between paternal leave and guaranteed childcare.

Article 12. Health

The reproductive rights of women are not guaranteed in Iceland.

Abortion was legalized in Iceland in 1975, but with strict regulation. Women may not freely choose to have an abortion, rather they must apply for permission from health workers and, in some cases, social workers. Women who seek this permission are also required to undergo counseling on the risks of the abortion procedure and social assistance available to parents, and to receive education on matters related to contraceptives. Oral narratives by women who have undergone this counseling and education indicate that these sessions are not neutral and in some cases humiliating for them.

ICEHR and IWRA encourage the Icelandic government to ensure women's sexual rights and women's autonomy of their bodies, by guaranteeing women's right to choose whether or not they carry children to term.

Article 13. Economic and Social Benefits

Women in Film Making

In June 2015, the New York artist collective Guerrilla Girls publicly criticized Iceland's National Film Centre for its low funding of women's films, that in 2000–2012, only 13% of the films funded by the Icelandic Film Centre were made by women.

These stark numbers, highlighted by the Guerrilla Girls, have already had an impact on the way the Icelandic public discusses film making and the role of government in funding film making, and on discussions taking place on the governmental level. The government is legally required to host a Gender Equality Forum every two years, informing the public about the status of gender equality in Iceland. At the Forum in November 2015, one of the main speakers was the director of the Swedish Film Institute, who has corrected the gender imbalance of the Institute, so women now receive half of its funding.

We express our hope that the Icelandic Film Centre learns from the active example of the Swedish Film Institute, and guarantee that its funding, ultimately paid by the Icelandic people, is equally divided between women and men.

ICEHR and IWRA encourage the Icelandic government to review regulations for government funding bodies for culture, and explore options to make sure that public funds for culture are equally divided between women and men.

Women in the Music Industry

The status of women in the Icelandic music industry is leaves much to be desired. Women are only paid 10% of all fees collected by STEF – the Performing Rights Society of Iceland, the non-profit collective rights management society that administers Icelandic copyright for music creators and publishers whose music is performed in public. Women are paid less for their music, because music composed and written by women is played less in public than music composed and written by men.

A 2013 study on the status of women in the popular music industry in Iceland points out that men make up the majority of the boards of associations and regulatory bodies created by the music industry and artists. Men also make up the majority of the organizers of Icelandic music festivals. All the record labels in Iceland are run by men. Men also make up the majority of radio producers and writers in all Icelandic radio stations, except one. The study also analyzes nominations to the Icelandic Music Awards, where women are mostly ignored. In 2012, no woman was nominated to the Icelandic Music Awards in fields related to pop music and rock music, except for the field of best female performer.

In 2013, Icelandic women musicians formed their own association, KÍTÓN, to serve the interests of women musicians in Iceland and lobby for greater representation.

ICEHR and IWRA encourage the Icelandic government to review regulations for government funding bodies for culture, and explore options to make sure that public funds for culture are equally divided between women and men.

Article 14. Rural Women

ICEHR and IWRA reiterate their concern that support and services to victims of domestic violence and victims of sexual violence is lacking outside Reykjavík and the greater metropolitan area, as discussed above.

There is only one shelter for victims of domestic violence in Iceland, located in Reykjavík.

There are only two hospitals in the country which offer specialized receptions and services to victims of sexual violence, Landspítalinn in Fossvogur, Reykjavík and Akureyri Hospital in Akureyri.

Counseling for victims of sexual violence is offered by four NGOs in the country, Stígamót and Dreka slóð in Reykjavík, Aflið in Akureyri and Sólstafir in Ísafjörður. Stígamót provides services for individuals outside of Reykjavík, with biweekly visits of counselors to the townships of Egilsstaðir and Patreksfjörður, visits to townships who request their services, and individual counseling through telephone, Skype conversations and live chat online.

ICEHR and IWRA encourage the Icelandic government guarantee victims of domestic and sexual violence equal access to support and services.

Article 16. Personal and Family Rights

Altruistic Surrogacy

ICEHR and IWRA express concern with the current attempts of the Icelandic government to legalize surrogacy.

In the fall of 2015, a bill came up before Parliament which would, if passed, legalize altruistic surrogacy in Iceland. Both ICEHR and IWRA issued opinions against the bill and sent to Parliament. The Parliament received 17 opinions on the bill, written by institutions, NGOs and individuals, 12 opposed, 2 for, and 3 neutral.

Very little in-depth and balanced discussion has taken place in Icelandic society on the ethical, legal, human rights and other implications of surrogacy. In view of this, ICEHR and IWRA encourage the Icelandic government to not legalize surrogacy, whether or not for altruistic or commercial reasons.

