

**Icelandic shadow
report for CEDAW**

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MANNRÉTTINDASKRIFSTOFA ÍSLANDS
ICELANDIC HUMAN RIGHTS CENTRE



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Notes on the Government of Iceland's Ninth Report on the Implementation of the Convention on the Elimination of All Forms of Discrimination Against Women

Submitted by ICEHR, IWRA, Öfgar, UN Women Iceland and OBI to CEDAW in advance of the Committee's consideration of Iceland's ninth periodic report



Icelandic Human Rights Centre
Icelandic Women's Rights Association
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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 and gender discrimination. A new Act on Equal Status and Equal Rights Irrespective of Gender, No. 150/2020 was implemented in 2020. The Act prohibits multiple discrimination and reflects recent international developments regarding equality. It has often proven to be difficult to establish discrimination solely on grounds of gender but when other discrimination grounds such as ethnicity, disability, sexual orientation, age, or religion are added to the equation, often multiple discrimination becomes apparent. The Act also requires a company or institution with an average of 25 or more employees in principle per annum to acquire equal pay certification following a certification body's audit of the company's or institution's equal pay system in which it is confirmed that the equal pay system and its implementation meet the requirements of the ÍST 85:2012 standard. The selling of a person's own body remains decriminalised in Iceland, while the purchase of one remains illegal. In 2018, amendments were made to the General Penal Code, the stipulation on rape now states that a person who has sexual intercourse or other sexual relations with a person without his or her consent shall be guilty of rape. 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, the Icelandic Women's Rights Association, UN Women Iceland, the Icelandic Disability Alliance and Öfgar - a non-profit organisation against gender-based violence (hereinafter referred to as "the coalition") 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:

- The Coalition expresses concern with the lack of funding to the 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.
- The Coalition recommends 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.
- The Coalition is 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 Directorate of Equality, the government institution charged with carrying out and monitoring compliance with equality legislation in Iceland, has not been adequately financed in the past 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.
- The coalition expresses concern regarding the justice system due to low conviction rates, how perpetrators are using the justice system against their survivors, long proceeding times, mitigated penalties and the statute of limitations.

Article 1 – Discrimination

The Act on Equal Status and Equal Rights Irrespective of Gender, No. 150/2020, contains a definition of both direct and indirect gender based discrimination, multiple discrimination, gender based violence, gender-based harassment, sexual harassment, gender mainstreaming and affirmative action. Overall, the Act is in compliance with CEDAW's stipulations.

However, the CEDAW Convention has still not been implemented into domestic law with the consequence 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.

- The coalition urges 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 Equal Status and Equal Rights Irrespective of Gender, No. 150/2020, entered into force on January 6th 2021, replacing the Act on the Equal Status and Equal Rights of Women and Men, No. 10/2008 (Gender Equality Act). This legislation includes all genders, women, men, and people with nonbinary gender registration. The Act contains a new stipulation on multiple discrimination as well as various improvements and specifications as regards other stipulations.

The Icelandic Government is currently operating under an Action Plan on Equality issues 2020-2023.

According to Article 27 of Act No. 150/2020, 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 Act, the work on gender mainstreaming in the fields administered by the ministry. However, the coalition expresses 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 is a direct result of the lack of funding for hiring full-time gender equality representatives. This means that the government has been unable to fulfil Article 17 of the Gender Equality Act, to work on gender mainstreaming in all areas of government.

- The coalition encourages the Icelandic government to adequately budget for gender equality representatives in government institutions.
- The coalition encourages the Icelandic government to work on gender mainstreaming in all areas of government.

The coalition welcomes new legislation passed in 2015, Act No. 123/2015, mandating that future government budget proposals be gender responsive, written with analysis of its effect on the equal status of women and men.

The Directorate of Equality

The Directorate of Equality oversees the implementation of the Act No. 150/2020, Act No. 85/2018, and Act No. 86/2018. The Directorate also handles administration of all matters concerning equality covered by the Act on the Administration of Matters concerning Equality, no. 151/2020. The Directorate provides counselling on equality issues to the government and other actors, monitors 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 aforementioned Acts. Even though the legislation from 2020 has greatly added to the Centre's workload and responsibilities, there has been little or no increase in budget. The coalition therefore fears that the Centre cannot adequately fulfil all of its responsibilities, due to

budgetary constraints and lack of staff. Albeit that the Directorate has been able to supplement its funding by outside grants, they often are awarded to specific projects. It is inadequate that the government institution tasked with monitoring and accomplishing the core equality work of the government should have to rely on outside competitive funds.

- The coalition is concerned that the Directorate is insufficiently funded to meet its fundamental responsibility, that is to monitor the implementation of the three Acts and encourages the Icelandic government to adequately fund the Directorate of Equality.

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 (ECoHR), which contains a general prohibition of discrimination. Iceland has also signed but not yet ratified the Optional Protocol of the International Covenant on Economic, Social and Cultural Rights (CESCR).

- The coalition urges the Icelandic government to ratify Protocol 12 and the Optional Protocol of the CESCR 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 (NHRI) in Iceland so its role has been assumed by the Icelandic Human Rights Centre, an independent non-governmental institution, albeit mostly funded by the state. The Icelandic government has expressed their intention to establish a NHRI and have started their work on a green book giving an overview of the status of human rights in Iceland. They have also stated that a bill on the establishment of a NHRI will be presented before parliament in 2023.

- The coalition urges the Icelandic government to carry out their intent to establish a NHRI and to make use of the Icelandic Human Rights Centre's experience, network and expertise.

- The coalition encourages the Icelandic government to ensure that the process is open, transparent, and done in consultation with organisations working on human rights of various groups.

Article 4 – Special Measures

Although Act No. 150/2020 on Equal Status and Equal Rights Irrespective of Gender provides for equality between women, men and people with a gender neutral registration, its provisions, which state that the ratio of women to men shall be about equal at any given time and aim to equalise the opportunities these two groups have for participation in society remain unchanged from the previous gender equality legislation. An amendment was made to the act on the article on participation in committees, councils and boards in the public sector in connection with the rights of people with neutral gender registration.

- The coalition urges the Icelandic government to continue to pave the way for women and people with neutral gender registration towards positions of influence.

Article 5 – Structural Changes, Sex Role Stereotyping and Prejudice

The coalition welcomes 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 those which deal with intersectionality of gender discrimination.

Act No. 150/2020 on Equal Status and Equal Rights Irrespective of Gender provides a consultation forum on gender equality issues that shall be held at least once a year. The forum shall be formed with representatives from the labour market, the academic community and organisations working on gender equality in accordance with the Act. One forum has been held

so far, on June 1st 2021. According to the summary of the first meeting, the main conclusions regarded equality knowledge, especially in the public administration. Knowledge of the issue must be present in order to be incorporated in the best way possible. The importance of ongoing gender equality education in the labour market, staff in general and managers, were also concluded.

- The coalition encourages the Icelandic government to use all the information gathered from the forums into full effective measures.

The coalition further raises concern that politicians who have publically maintained harmful rhetoric, both publicly and in private, against gender equality, and spoken about women in a degrading fashion face no consequences.

- The coalition encourages the Icelandic government to put in place measures that tackle harmful rhetoric in an appropriate manner.

Article 6 - Exploitation of and Trafficking in Women

The coalition celebrates that in 2018, Iceland became the 30th State to ratify the Istanbul Convention. However, there's still work to be done, as outlined below.

Prostitution, Strip Clubs and Trafficking

Still today the defendants in Iceland, fined or sentenced for purchase of prostitution, remain anonymous. The coalition expresses concern that granting anonymity to people who purchase prostitution will render the preventive effect of the legislation ineffective.

The number of cases investigated by the police has varied greatly between years. There is need for more funding and police reinforcement to promote the investigation and prosecution of prostitution and sex trafficking cases.

In 2019 the government implemented an ambitious action plan to fight human trafficking. Part of that plan was to create a response team for survivors of sex trafficking. Bjarkarhlíð opened a response team for survivors of sex trafficking that has been up and running since July 1st 2020. In 2020 and 2021, the team handled 15 cases, 9 on trafficking for labour (1 both trafficking for labour and sex trafficking), 4 on sex trafficking cases and 2 on smuggling of persons. The team was established through an agreement with the Ministry for Social Affairs. It should ensure a quick reaction to reports of sex trafficking, that the cases are handled correctly from the beginning and adequate assistance for the survivors. In spite of the positive actions in this field, there is still a lack of holistic approach and efficient system. Survivors need more resources, including resources outside of Reykjavík and the Greater Metropolitan Area, increased knowledge of sex trafficking for people involved in such cases and the public. Research into the status of foreign women in the labour market and the scope of labour and sex trafficking is needed. Further, there is still lack of resources for women who want to leave prostitution or sex trafficking and for women in prostitution who are in need of help and support. There are reception centres for all survivors of violence to use, but the only resource which has a special group for women in prostitution is Stígamót, a center for survivors of sexual violence.

According to Eurostat, the statistical office of the European Union, there has been increase in money spent buying prostitution in Iceland in the years 2016-2019, which is concerning. In 2019, Kveikur (an award-winning investigative news program airing on RUV), covered prostitution and came to the conclusion that it's as easy to buy prostitution as it is buying take away food in Iceland.

- The coalition encourage the Icelandic government to increase funding to the police to investigate cases of prostitution and human trafficking, 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.

- The coalition encourages the Icelandic government to increase funding to combat trafficking and to make sure that women survivors of trafficking receive help and justice.

Violence Against Women

The General Penal Code penalizes all forms of violence against women but lately survivors of gender based violence have brought attention to the injustice they face in the justice system, for example by pointing out a low conviction rate, how perpetrators are able to use the system against survivors by pressing counter charges, for defamation of character, and how long the proceedings are taking. Results from “Áfallasaga kvenna”, a scientific study commissioned by the University of Iceland, where 32,811 Icelandic women participated, showed that 40% of all women in Iceland are survivors of physical and/or sexual abuse. One fourth of the participants were survivors of rape or attempted rape.

In 2021, a Parliamentary bill was passed on changes to the General Penal Code regarding digital sexual violence (before known as non-consensual pornography or “revenge porn”). The legislative framework is in place but needs to be applied more frequently.

- The coalition recommends improvements towards prevention and education regarding digital sexual violence as well as support for survivors of abuse.

The statute of limitations for sexual offences varies. For rape and some other sexual offences, there is no statute of limitations if the survivor is under 18 years of age. For other offences, the statute period does not start until the survivor reaches 18 years of age. If the survivor is over 18 years old, the statute period starts as soon as the crime is committed.

- The reporting group encourages the government to revoke all statute of limitations in sexual offence cases.

The Court of Appeal in Iceland, mitigated penalty in 26% of sexual abuse cases in the years 2018 - 2020. The Court of Appeal accepted sentences made by the District Court in 45% of cases in

these years. It's a cause for concern that The Court of Appeal mitigates sentences more often in sexual abuse cases than in any other criminal cases.

Stígamót – A Center for Survivors of Sexual Violence have challenged the Minister of Justice to consider the making of survivors of abuse party to their cases instead of being witnesses. In their statement, which was also signed by 12 other organisations, to the Minister of Justice, they explain the importance of survivors of abuse getting the same access as the defendant to data to defend their case. In March 2022, the Minister of Justice was handed over 12.000 signatures from people challenging him to improve the legal status of survivors of abuse.

Findings from a report published in 2013 (the most recent overview) showed that only 17% of rape cases ended with prosecution and only 13% in conviction. Cases were dropped due to passing of statute of limitations, witnesses were not called in for questioning, evidence such as injuries, certificates from psychologists, phone video recordings, even crime scene evidence were given little merit etc. Recent changes in the General Penal Code, namely the change of the legal definition of rape to a consent-based one, do not seem to be reflected in judgements in rape cases, as older criteria are still being used.

The coalition raises concern that the Icelandic legal system is failing survivors of sexual abuse who press charges. This can be seen statistically when numbers of visits from survivors of abuse from Stígamót, Bjarkarhlíð and the Rape Crisis Centre in Landspítalinn are compared to the numbers of cases reported to the police and cases handled by the prosecution. In 2020, they reported a total of 1256 new visits, while only near 100 cases of rape were reported to the police in the capital area and the State persecutor reported 325 cases of sexual violence handled by the prosecution in the same year. Since the annual report from the National Commissioner of Police for the year 2020 hasn't been published yet we are only comparing numbers of visits by survivors of abuse and reported cases of rape in Reykjavík, the capital city, not throughout the country.

- The coalition welcomes the special task force on prevention and awareness raising against sexual violence and gender based violence that has been put together and urges the Icelandic government to take radical action.

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 2019, women made up 28% of the police force. 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.

Further, there was a case in 2018 where a trans woman reported a case where she faced discrimination while entering a night club and was barred from entry. The police was dismissive of her case and it took her three years to get it to court, where it's currently being processed. She, and the national queer organisation have accused the police of being transphobic in its action against her.

- The coalition encourages the Icelandic government to commission a new report on the Icelandic police force, in regards to treatment of women within the force, with possible solutions to rectify the situation.
- The coalition expresses its concern at the high number of dismissals of charges of rape and other sexual violence by the State Prosecutor and the low number of convictions in cases of rape and other sexual violence
- The coalition urges the Icelandic government to make an investigation into the police to see if transphobia is present, and if so, take action against it.

In March 2021, a group of nine women filed a complaint against the Icelandic State before the European Court of Human Rights for violation of their right to a fair trial. The women reported rapes, domestic violence and sexual harassment to the police, but all cases were dropped by

the prosecution authorities. The ECHR has requested for the Icelandic state to answer why four of the women's cases were dropped and whether that was in accordance with the European Convention on Human Rights. According to the plaintiffs there was evidence in all of the cases which should have led to them going to trial. The Icelandic state had until fall 2021 to answer the Court's questions.

- The coalition recommends that the government ensures adequate funding to the investigation and prosecution of sexual offences and domestic violence cases as well as to the training of police, prosecutors and judges on the legislative intent as regards penal stipulations on sexual offences and violence in abusive relationships, in particular as regards the Penal Code stipulation on rape which is based on voluntary consent.
- The coalition encourages the Minister of Justice to take recommendations, made by various organisations, on making survivors of abuse party to their cases instead of being witnesses, into consideration. The coalition reminds the Government of the importance of ensuring that cases of abuse should not be handled by people who have a relation to the survivor of abuse or the defendant. There should also be established special supervision for when police officers are charged with sexual abuse, for example could the prosecution be in charge of the investigation.

Violence Against Women with Disabilities

A report issued in August 2020 by the National Commissioner of the Icelandic Police states that people with disabilities are much more likely to be subject to violence than people who are not living with disabilities and that convictions in cases of violence and abuse of people with disabilities are far less likely compared to cases of non-disabled survivors. A bill on amendments to the Act on Criminal Procedures, i.a. aimed at improving the status of survivors with disabilities in the criminal justice system, has been presented to parliament. However, more effort and education are needed.

- The coalition recommends for the government to establish education programs for the police, prosecutors and judges on methods for questioning survivors with disabilities and other measures necessary to ensure as fair and thorough procedure as possible.

Violence Against Immigrant Women

In 2018 women of foreign origin in Iceland gave a statement which included stories of violence, harassment and injustice. The stories reported prejudice, discrimination, systematic degradation, seclusion, manipulation and abuse of the worst kind. Women reported feeling abandoned and isolated. They demanded to be included when plans of action are being made in order to wipe out sexual discrimination, abuse and harassment and within these plans of action there should be specific actions for women of foreign origin.

Few studies have been done detailing violence faced by immigrant women in Iceland. A report commissioned by the Ministry of Social Affairs in 2019 showed that immigrant women are not aware of the resources they are entitled to, for example regarding sexual violence. It also reports that numbers from the police indicate a higher rate of violence against immigrant women. The lack of information and research on violence against immigrant women raises a concern.

The same report showed that women of foreign origin in Iceland experience powerlessness by the lack of safety net in Icelandic society and emphasises the need for explaining and highlighting the hidden power situations which reproduce values and norms that can contribute to more gender-based violence in the workplace and in the privacy of their homes.

In a research on bullying and harassment in the workplace by The Social Science Research Institute the results indicated that personnel with foreign citizenship are less likely to report sexual harassment in the workplace than personnel with Icelandic citizenship.

The number of immigrant women seeking help from The Women's Shelter is rising. New data

shows that women of foreign origin seek help more often and stay longer in the shelter on average than Icelandic women. In 2020, 64% of the women who stayed at the shelter were immigrant women, while in 2014 they made up 32% of residents. This disparity can probably be traced to the fact that immigrant women do not have the same family safety net as native Icelandic women.

- The coalition encourages the Icelandic government to instigate research into violence faced by immigrant women in Iceland and to look into the safety of immigrant women in workplaces.
- The coalition urges the Icelandic government ensure that future action plans against domestic and sexual violence, are sensitive to the needs and well-being of immigrant women and that NGOs providing counselling for survivors of sexual violence, located outside of Reykjavík, receive adequate funding to carry out their operations as well as the ones operating in the greater metropolitan area.
- The coalition encourages the Icelandic government to adequately fund the Multicultural and Information Centre and increase accessibility to its services.
- The coalition urges the Icelandic government to ensure better access to information for immigrant women and to expand the response team services for survivors of sex trafficking outside of Reykjavík and the greater metropolitan area.

Article 7 – Political and Public Life

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

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. According to Article 28 of the Act on Equal Status and Equal Rights Irrespective of Gender when appointing in committees, councils and boards on behalf of the state and municipalities, special measures shall be taken to ensure that the ratio of women to men shall be as equal as possible and not less than 40% in the case of more than three representatives. This also applies to the boards of public limited companies and companies in which the state or municipality is the main owner. However, the ratio of women on the boards of large companies, with three directors, was 34.8% for public limited companies in 2021 and 29.3% for private limited companies. This is stated in new statistics from Statistics Iceland. The ratio of women on the boards of large companies, with over 50 employees, with four or more directors, was 41.5% in the case of public limited companies in 2021 and 38.3% in private limited companies.

At the end of 2021, just over a quarter of the directors of companies that pay salaries and are registered in the Register of Limited Liability Companies were women, or 27%. The proportion of women in the position of managing director has risen slightly between years, but the proportion of women in the position of chairman of the board was 24.7% at the end of 2021. In a survey conducted in 2020 amongst 186 female leaders in the Icelandic business community, it became apparent that a radical change was needed. Majority didn't feel as the regulation from 2010 had made a significant difference.

- The coalition encourages the Icelandic government to make gender quotas mandatory within political parties.
- The coalition encourages the Icelandic government to explore ways to increase the number of women on the boards of companies with 25 employees or more, and women in leadership roles in the private sector.

Article 8 – International Representation

Although systematic efforts have been made to equalise the gender ratio in the Icelandic foreign service women are still highly underrepresented in the Icelandic Foreign Service. In May 2022, 19 men (68%) served as ambassadors abroad and 9 women (32%). In the last CEDAW report the gender ratio was 69/31 so the ratio hasn't improved at all. For the first time Iceland has a female Prime minister and a female minister of foreign affairs. There is a unique opportunity to make a great change towards more equality in the Icelandic foreign service. It is very important that women have a seat at the table in international representation so their voices will be heard on international matters.

- The coalition reiterates the importance of increasing the number of women in the Icelandic Foreign Service.

Article 10 - Education

Since 2011, equality has been one of the six pillars of educational approaches in the Icelandic school system. However, when school schedules are viewed, there aren't any clear signs of this. We emphasise the necessity of teaching gender studies in schools.

Equal representation of women and men in textbooks are concerning. In spite of awareness raising in the last years and a report published in 2011, which showed a severe underrepresentation of women in history books written for Icelandic compulsory schools, studies on this topic have been lacking.

In 2020 the Minister of Education and Culture established a working group on the improvement of sex education in primary- and secondary schools. The report was published by the group in 2021 and addresses the ideology of sexual health and comprehensive sex education, legal obligations and statutes, as well as the national curriculum guide for primary- and secondary schools.

- The coalition encourages the Icelandic government to take the report under advisement with an emphasis on making gender studies and sex education a compulsory subject
- The coalition urges the Icelandic government to 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.
- The coalition recommends 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 all genders.

Article 11 – Employment

The adjusted gender pay gap in Iceland in 2020 was 4.1%.

- The coalition encourages the Icelandic government to continue its work to eradicate the gender pay gap.

The Equal Pay Standard

The coalition welcomes 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.

- The coalition encourages the Icelandic government to continue its work to fully implement the Equal Pay Standard and to introduce the standard to the international community .

Immigrant Women in the Labour Market

A risk assessment report on organised crime, issued by the National Commissioner of the Icelandic Police in 2019 states that it has received reports about the trafficking of workers in the labour market. From 2015 until March 16, 2019, 35 cases regarding trafficking for labour were investigated and possible survivors were 48. However, no further studies of trafficking of immigrant workers in Iceland have been published, nor a gender analysis of these cases.

- The coalition encourages 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 6 months are allotted to each parent, but six weeks may be transferred from one parent to the other. One parent may take 4 months of additional leave to care for their child until the child reaches 8 years of age. Since 2007, around 90% of Icelandic fathers have taken paternity leave, following the birth of their children.

The Parental Leave Fund pays 80% of their general income to parents on parental leave.

We express our concern that parents are only guaranteed 12 months of parental leave, and children are only guaranteed daycare from the age of 2, although this varies between municipalities. The care of children in the gap between the expiration of parental leave and the start of daycare is often assumed by mothers, requiring that women either start working part-time or withdraw completely from the labour market. This childcare gap thus adversely affects the status of women in the labour market and in society.

- The coalition encourages the Icelandic government to adequately fund the Parental Leave Fund.
- The coalition encourages the Icelandic government to bridge the gap between paternal leave and guaranteed childcare.

Article 12 - Health

Since Act No. 35/2019 on Sterilisation Procedures entered into force, reproductive rights of women have expanded. Sterilisation procedures are only permitted if requested by individuals over the age of 18 and are only permitted for individuals under 18 when it can be assumed that being fertile will have serious effects on the life or health of the individual in question and this assumption is backed up by the attestations of two doctors and the consent of a specially appointed legal guardian.

Minority groups, such as disabled women (especially those with learning disabilities, mental health issues and psychosocial disabilities, and substance use disorder) find it hard to seek general health service. They experience prejudice and in some cases humiliation. It seems there is a lack of reasonable accommodations, both regarding information and in the physical environment.

- The coalition encourages the Icelandic government to take action so all women feel safe and are able to seek the health care they need.

The Icelandic government ratified the Convention on the Rights of Persons with Disabilities (CRPD) on 23. of September 2016 but has not yet ratified the Optional Protocol with the CRPD.

- The coalition urges the Icelandic government to ratify the Optional Protocol with the CRPD and incorporate it into national law as a means to strengthen the limited anti-discrimination legislation in force in the country.

The rights of trans women, men and nonbinary people was strengthened by the Act No. 2019/80 on Gendered Autonomy. This Act ensures the right to define one's own gender and

that it is legally recognized. Furthermore, the Act protects one's right to physical integrity and autonomy over changes of sex characteristics.

However, trans-related health services have been a neglected field within the Icelandic health care system. There is a long wait for gender reassignment surgery, which can sometimes take up to a few years. Furthermore, there are indications that the information flow to trans people within the system is lacking.

- The coalition urges the Icelandic government to speed up the wait for gender reassignment surgeries and to ensure adequate information flow to trans and nonbinary people.

Article 13 - Economic and Social Benefits

Pension Rights

According to a study from 2021, women in Iceland receive on average 13,2% less pension than men. A variety of reasons can be behind this, such as women taking longer parental leave, leaving the job market younger, or more women having part time jobs, due to child caring duties. This is of concern to the coalition. While a married couple can divide their pension among the two of them, this reinforces the idea that a woman has to be married in order to receive the same benefits as men.

- The coalition encourages the Icelandic government to come up with solutions to rectify this gap.

Women in Filmmaking and the Music Industry

From the year 2010, the number of Icelandic movies directed by women has been slowly falling. It currently stands at 6%. The data comes from Statistics Iceland, who calculated that between 2010 and 2017, 6 out of every 65 Icelandic movies were directed by women.

The status of women in the Icelandic music industry leaves much to be desired. Women are only paid 19,44% 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 still played less in public than music composed and written by men.

While the coalition celebrates that the information on the Artist Salary Fund and Rannís websites now includes gendered data, and that the Icelandic government is reviewing this data, it worries that adequate action is not being taken.

- The coalition encourages 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.

Discrepancies Between Men's and Women's Sports

When it comes to sports we are still seeing gender discrimination with far more men chairpersons of sportclubs than women, with pay gaps from the national teams down to most sport clubs in Iceland and with less safety and motivation for women. We are seeing cases of women's teams getting significantly lower income while operating with a profit while men's teams get higher income while operating with a loss. The annual report from KSÍ for the year 2021 shows differences in salary and contractors payments, where the women's national team got 57.191.429 ISK and the men's national team got 121.512.117 ISK.

We need to make sure women are safe playing sports. In 2021 survivors of abuse and people fighting gender-based violence in Iceland opened up about the silencing and cover-ups of abuse made by the Icelandic Football Association (KSÍ). The KSÍ president and 15 board members resigned following the claims. Aþena, a basketball club founded on the principle of empowering young people, especially young women and immigrant youth in Iceland, gave a statement in 2021 saying the Icelandic Basketball Association (KKÍ) was silencing sexual violence. They demanded actions from them because of unacceptable situations and claimed that girls are not safe within the community due to unresolved issues and inactions regarding sexual violence.

- The coalition urges the Icelandic government to make sure playing sport is as safe and motivating for women as it is for men.
- The coalition encourages actions to bridge the pay gap in sports.
- The coalition recommends looking into gender equality regarding sport clubs management where far more men are chairpersons than women.

Article 14 – Rural Women

Although a shelter for victims of domestic violence in Akureyri has opened, it is still not sufficient. Now there are two shelters, one in Reykjavík and one in Akureyri. And also Bjarkarhlíð, Bjarmahlíð and Sigurhæðir – one stop shops in Reykjavík, Akureyri and the South of Iceland. Women living in rural areas of Iceland still need to seek assistance outside of their region. There are still only two hospitals in Iceland (in Akureyri and Reykjavík) that provide specialized receptions and services to victims of sexual violence. There is still great need of improvement in that area – so all victims of sexual violence in Iceland can have medical examinations and help, regardless of their home address. Thanks to NGOs in Iceland, victims of sexual violence have access to counselling. Stígamót provides services for individuals with

monthly visits to the township of Ísafjörður, and individual counselling through telephone, Skype conversations and live chat online. Waiting lists for psychologists are very long in the public-run- system and the government doesn't subsidise the cost of seeking emotional help at private-run-psychologists, although it has entered national law – so it can be very expensive for victims of violence to seek help and recovery. Especially in the rural areas of Iceland where there are very few options for emotional support – if any.

- The Coalition emphasizes the great importance of support for all victims of domestic violence and victims of sexual violence in Iceland and encourage the Icelandic government to guarantee equal access to support and services around the country to all victims of domestic and/or sexual violence.