

Supplementary Report to the 8th Norwegian Report to the CEDAW Committee from the Equality and Anti-Discrimination Ombud

Introduction

This is a supplementary report to Norway's 8th official report to the CEDAW Committee. In this final report the Ombud summarizes our report to the Pre-session in August 2011 and presents some additional comments.

The Ombud has identified 5 main issues regarding the Norwegian gender equality policy, which we think is relevant when assessing Norway's compliance with the CEDAW Convention. If not addressed, the policy *itself*, despite its potential, can bring about the unintended effect of sustaining and reproducing discrimination against women and girls.

The assessment is based mainly on our experience of handling discrimination cases, our experience of monitoring and providing guidance on the legal duty to promote equality, and on our participation in public policy hearings and our consultations with women's organisations and other organisations that promote the rights of women.

Norway's overall gender equality policy, which is based on a twofold strategy that combines gender mainstreaming with gender-specific actions, has succeeded to a certain extent in reducing discrimination against women and girls in some areas in Norway (as documented in Norway's 8th official report to the CEDAW Committee). The Ombud would like to commend the Government of Norway for this. However, the Ombud would also like to take this opportunity to point out that sex and gender-based discrimination against women and girls still exists in Norway, and that it appears to be particularly resilient in relation to the right to freedom from violence and in the field of employment.

1. The Root Causes of Discrimination

The State Party is failing to sufficiently address one of the root causes of discrimination by not addressing harmful gender stereotypes nurturing discrimination. A failure to address and eliminate prejudices and harmful gender stereotypes may be in breach of CEDAW's Article 5. In an action plan for Gender Equality presented in November 2011¹ the Government acknowledges the harmfulness of existing stereotypes and proposes certain measures in this regard. The Ombud commends the State Party for this. However, the Ombud will still emphasize the importance of implementing such measures and further develop this line of work in all areas.

The persistence of sex and gender-based discrimination against women and girls in various aspects of their lives stands in contradiction to the widespread notion that gender equality has been achieved in Norway. The Ombud is concerned that this may lead to an 'othering' of de facto gender inequality in that gender inequality concerns are seen to be relevant only for immigrants, and that only women from minority groups face severe discrimination. A case in point is how public discourses focus on rape committed by immigrant men and whether girls should be allowed to wear the hijab at school. Simultaneously there is little debate about peer

rape and date rape, the current media's sexualisation and objectification of young girls, and the overwhelming amount of easily accessible pornography featuring children and teenage girls.

Media

In addition to being widespread, media-driven female stereotypes have become increasingly sexualised over the last three decades. A recent dissertation on health-related quality of life and pain in children and adolescents concludes that self-perceived body image is the most powerful predictor of health-related quality of life.²

Violence

The Ombud is concerned about the general attitudes towards rape. Both rape against a defenceless person and rape in relationships are covered by the law governing rape, the penal code article 192. Studies however show that the general population do not see rape of women who have been under the influence of alcohol as 'real' rape.³ The Ombud is concerned that such attitudes can lead to increased violence. A Norwegian study among young people found a widespread acceptance of the absence of mutual consent in sexual relations among young people.⁴ The researchers conclude that boys need to be more aware of their attitudes to mutual agreement and respect in sexual relationships. The Ombud is also concerned that such attitudes can lead to fewer girls being willing to report rapes to the police. Studies also show that young girls do not define abuse committed against them as rape, even when the abusive act falls under the legal definition of rape.⁵

The Commission on Rape pointed out in their report that the preventive work on rape ought to begin much earlier than it does today. The Commission's recommendations have scarcely been followed up by the authorities.⁶ The Ombud is concerned that these attitudes of what is "real rape" and the ideal rape victim can influence legal proceedings in rape cases. Studies of Supreme Court case law concerning violations of the General Civil Penal Code Section 192 first paragraph letter (b) (rape of a defenseless person) show that the courts have very often contrasted this type of rape with what they call "traditional rape". It also appears that the absence of violence and threats almost automatically results in the courts considering defenseless rapes as belonging to the provision's "lower tier".⁷

The Ombud is concerned that these attitudes also may lead to wrongful acquittals. According to a report from the Norwegian Director General of Public Prosecutions, it is a commonly held view among jury members that rape is something that is committed by unknown persons and through the use of extensive force.⁸ Such stereotypes would, however, be difficult to expose in many rape cases since the jury does not give reasoned opinions for its decision of the question of guilt. Reference is made to the Cedaw Committee's decision in *Vertido v. Philippines* regarding stereotypes in the judiciary system.

In addition to possible wrongful acquittals, such attitudes may also in some cases result in intentional rapes being judged pursuant to other and more lenient penal provisions.⁹ In 2010

the minimum sentences for rape was increased from two to three years. The legislative intent was in part that sentences for rape of defenseless persons in particular must be increased. The Ombud believes that it is important to keep a critical eye on how the new sentencing provisions will be followed up by the courts, and especially whether the minimum sentence in itself might be an obstacle for conviction in certain cases.

A law commission has recently evaluated the use of juries in criminal proceedings in Norway and has recommended that all decisions regarding the question of guilt be supported with reasoned opinions.¹⁰ The Ombud supports the Commission on this point. In light of the obligations under Cedaw, it is important that this recommendation be followed up by the State authorities.

- *The State Party should initiate research on the root causes of violence against women and girls, including the extent to which media-driven gender stereotypes are a factor.*
- *The State Party should initiate regular reviews of rape cases. In addition to a review of the sentencing, any unintended consequences, such as the application of more lenient penal provisions and acquittals, should be focused on in particular.*
- *The Ombud believes that sexual assault as a topic should be obligatory in education, and competent teaching personell should be ensured.*
- *The State Party should follow up the Rape Committee's recommendation to raise the competence of the judiciary.*
- *The State Party should follow up the law commission's recommendation regarding the obligation of juries to give reasoned opinions in the question of guilt.*

Political power

Despite political parties having greater number of women on electoral lists, the result after the last local and regional election in 2011 is that the percent of women representation in local government is stagnant. After the election in 2011 women representation was 38% as compared to 37.5% in the election of 2007. This shows in the Ombud's opinion that the measures implemented by state authorities have been inadequate. A recent public discourse on the massive harassment of women in politics shows the need to focus on attitudes and the eradication of stereotypes and prejudices.

Working life

The Ombud refers to the CEDAW Committee's concluding comments Nos 25 and 26 on Norway's seventh periodic report, in which the committee expresses concern about the less advantageous position of women in the labour market and recommends that the State Party continue its work on problems relating, among other things, to equal pay, the use of part-time employment and a more equal division of care functions. As documented in the state's report, there are still major challenges in these areas. In the Ombud's opinion one of the root causes in this regard is stereotypical perceptions as to: a) the value of women's work versus men's work, b) what are suitable characteristics for top leaders, c) part-time work being more

acceptable in sectors dominated by women, and d) the reliability of pregnant employees.

Equal pay

There is currently a 15% pay gap between women and men. The less advantageous position of women in the labour market is largely due to structural factors. The lower status of vocations dominated by women is an important explanation. The gender pay gap has remained stable for many years despite the fact that the authorities have focused on the problem. In the Ombud's experience, the equal pay provision in the Gender Equality Act alone is not enough to close the gap between women and men's pay. Since 2006, a breach of the equal pay provision has been found in only one of the 12 cases heard by the Equality and Anti-discrimination Tribunal.

The CEDAW Committee has previously recommended using work assessment tools to facilitate comparison of the work of men and women across sectors and across types of occupation. These tools are very little used, even though they could be an important means of preventing pay being determined on the basis of stereotypical ideas about the value of women's work versus men's work. Such a tool would not least be important in the local and central government sectors, which employ very many women.

- *The State Party should consider greater use of work assessment tools*
- *The State Party should consider adopting the proposal of the Equal Pay Commission regarding the establishment of an equal pay fund in order to jumpstart and accelerate the closing of the gender pay gap*

Use of part-time

Of all women in employment, 41% work part-time, compared with 14% of all men. This difference has remained stable for the past ten years.

Ten per cent of women and men who work part-time do so involuntarily, according to Statistics Norway (SSB). The criteria for being defined as under-employed in SSB's official Norwegian statistics are more stringent than in EU countries. The definition used by SSB probably means that a great number of cases go unrecorded. In order to be classified as under-employed, a part-time employee must have given notice that he/she would like to work longer hours, must have requested longer hours and must be available to start working longer hours at relatively short notice.

Differences in the way work is organised in typically male and female-dominated workplaces may reflect the stereotypical view that it is less important that women work full-time than men.

- *The State Party should consider making the right to work full-time statutory. Part-time work should be an option, full-time should be a right.*

- *The State Party should also improve the statistical basis for recording involuntary part-time work and consider harmonizing the Norwegian definitions with those of the EU.*

Discrimination on the grounds of pregnancy and parental leave

Discrimination on grounds of pregnancy or parental leave is strictly forbidden under the Gender Equality Act. In 2010, a prohibition on asking questions about pregnancy and family planning was incorporated into the Gender Equality Act. The Ombud is satisfied that this legal loophole has been removed. Despite good legal protection, cases concerning discrimination on the grounds of pregnancy/parental leave account for a considerable proportion of work-related complaints received by the Ombud. In the Ombud's experience, some employers seem to believe it is reasonable to give negative weight to the perceived practical and financial consequences of (expected) absence resulting from pregnancy/parental leave. This is why the Ombud believes that attitude-changing measures and increased awareness of the prohibition on discrimination are required. The Ombud commends the Government for proposing an amendment to the Equality Act specifying the rights of employees coming back to work from parental leave.

- *The State Party should continue to focus on measures designed to change attitudes and increase awareness about the unlawfulness of discrimination on grounds of pregnancy.*

2. The lack of an intersectional perspective may fail to adequately address the specific needs of women and girls

The State Party often uses a one-dimensional approach to equality, thus failing to meet the specific needs of women facing multiple and intersectional discrimination. The Ombud is concerned that certain gender equality measures do not benefit women who experience intersectional discrimination. That is to say, the very tools for the implementation of the gender equality policy could indirectly result in inequality between groups of women.

Work

Women with non-western immigrant background have a lower rate of participation in employment than ethnic Norwegian women.¹¹ A recent survey of service providers at the Norwegian Labour and Welfare Service revealed that more than 60 % of them were of the opinion that ethnic minority women received a poorer quality of service regarding work-training courses than ethnic minority men.¹²

In addition, disabled women have a lower rate of participation in employment, despite the fact that a large percent of them express the wish for employment.¹³

Violence

The service provided for women experiencing violence is not always designed to take into account the different needs of the various groups of women. Statistics from Norwegian crisis

centers show that women from ethnic minority backgrounds live at crisis centers for longer periods than ethnic Norwegian women.¹⁴ Women with ethnic minority backgrounds receive little practical help in finding housing, and have often problems in trying to find housing on their own.¹⁵ This is unfortunate in relation to their resettlement and integration. Some victims of trafficking have lived several years at crisis centers because of the lack of alternative housing.¹⁶ These shelters are meant for battered women to be used in an acute phase and research has shown that they are not suitable for longer stays.¹⁷

The Ombud is also concerned that victims of violence have difficulties accessing the services to which they are entitled because of a lack of coordination of public services. Surveys show that, to a greater extent than ethnic Norwegian women, women from ethnic minority backgrounds need practical assistance and referral to other parts of the public services.¹⁸ Despite legal provisions on the coordination of services, there is still a wide gap between the formal and the actual rights of victims of violence.¹⁹

Many of Norway's shelters for battered women are still not adapted to the needs of women with disabilities.²⁰ There are also few services available for women with drug abuse problems and mental health-related problems. The ordinary shelter services are unsuitable for women with drug abuse problems and mental health-related problems and it has been recommended that at least one separate emergency service for women with drug problems ought to be established in each region.²¹

Concerning sexually abused women with disabilities, there are weaknesses in the current reporting routines. Service providers who suspect that persons with intellectual disabilities are being sexually abused often do not report their suspicions.²² In addition, reports of sexual abuse of persons with intellectual disabilities are sometimes given low priority and receive little attention from the police.²³

- *The State Party should ensure that all equality measurers are designed and practiced in a manner that addresses relevant intersectional perspectives.*

3. The Dual Gender Equality Strategy

Norway has a dual strategy of combining gender specific actions and gender mainstreaming. The Ombud will emphasize two weaknesses in this strategy: 1) lack of implementation and 2) lack of specific gender equality measures.

The administrative structure for the implementation of the gender equality policy is too weak

A Government-appointed commission on equality (The Equality Commission) recently concluded that public authorities at all levels still fail to sufficiently mainstream gender equality as a matter of routine in their work as employers, service providers, appropriators of funds, policy-makers and as enactors of rules, regulations and ordinance. The promotion of gender equality is often given low priority, and the efforts taken lack a systematic approach

and continuity.²⁴ The different governments have done little to strengthen the administration's capacity to promote gender equality.²⁵ The Ombud questions whether gender expertise within the executive branch of the Government is sufficiently empowered.²⁶ The Ombud notes that the Ministry of Foreign Affairs is the only Ministry that can point to positive results from its dual strategy for promoting gender equality.²⁷ (The Ombud is therefore concerned that this Ministry now has decided to fully rely on the gender mainstreaming strategy, by closing down those entities especially designed for ensuring gender expertise.)

Moreover, the Equality Commission concluded that the administrative structure today is too weak to realize the ambitions of Norwegian gender equality politics. No system is set up to ensure that the ministries and their underlying government agencies follow up their legal duty to promote equality. A survey of county governors (fylkesmenn) and local and regional government authorities revealed that also these levels of government have not followed up satisfactorily their positive duty promote equality. In light of this the Equality Commission proposed that the legal duty to promote equality be amended by specifying in greater detail the obligations of the duty. Furthermore, the commission proposed a new structure to ensure the implementation of equality work.

From 2007 to 2009, the Ombud carried out reviews and monitoring of 86 local authorities' compliance with their reporting obligations under the positive duty – in their capacity as public employers. The Ombud's impression is that, in general, the promotion of gender equality has low priority in local government. Although this finding was specifically related to government authorities' promotion of equality in their capacity as public employers, there is little to indicate that this situation is any different as regards their promotion of gender equality in their role as service providers, policy makers etc. The Ombud believes this obligation has a clear potential to become an effective policy instrument in combating and preventing structural discrimination. The obligation can provide a framework for handling other mainstreaming measures, for example gender impact assessments, and gender budgeting.

However, as pointed out by the Ombud in its pre-session report in August 2011, a greater specification of the content of the positive duty to promote gender equality is necessary in order to increase its effectiveness. This is also a conclusion made by the Equality Commission. Furthermore, it is the Ombud's opinion that the lack of a duty to report on the compliance of the positive duty for government authorities in their role as exercisers of authority should be remedied.

- *The State Party should specify in greater detail the public authorities' duty to promote gender equality, both as an employer and as exerciser of authority. In addition, a reporting obligation for government authorities as exerciser of authority should be established.*
- *The specification of the public authorities' duty to promote equality should include:*

- 1) *addressing harmful gender stereotypes*
 - 2) *addressing violence against women*
 - 3) *a specific reference to intersectional and multiple discrimination in the positive duty to promote equality*
- *The State Party should establish a functional and well resourced apparatus for implementing and monitoring the State Party's gender equality strategy, including the duty to promote gender equality.*

Poor follow-up of the requirement of gender impact assessments

There exists no systematic training in the use of gender impact assessments to promote equality. Nor does there exist any documentation of the degree in which gender impact assessments are actually being carried out²⁸. The Ombud has on several occasions pointed out the lack of gender impact assessments, even when gender perspectives are clearly relevant. For example, in conjunction with the public consultations about a new pension system, proposed changes in law combining work with care, the official report on research in Norway, and in the proposed comprehensive legislation against discrimination.²⁹ Furthermore, the Ombud has observed that the impact of policy reforms on immigrant women, poor women, older women, women of different faiths, lesbians, women with disabilities, is seldom or never assessed.

- *The State Party should establish some mechanisms for training and monitoring the use of gender impact assessments. Furthermore, public authorities should publish the impact assessments that have been carried out.*

Poor implementation of gender budgeting

Although all Ministries are required by the Master Budget Document to incorporate gender and a gender perspective wherever this is found *relevant* and appropriate in the budget propositions,³⁰ the Ministries are performing poorly. An evaluation of gender budgeting revealed that there are great differences among the various Ministries. Also at local and regional levels, the Ombud knows of only sporadic efforts to carry out gender analyses of the budgets of local authorities.³¹

- *The State Party should establish some mechanisms for training local, regional and state authorities in the use of gender budgeting. Furthermore, the State Party should carry out a new evaluation after some period of time*

Gender blind actions failing to meet the needs of women and girls

The Act relating to crisis centers (the Crisis Centre Act), which entered into force in 2010, is intended to provide shelter for battered persons subjected to domestic violence (i.e. for both men and women). The Act transfers responsibility for the administration of the crisis centres to local authorities. Section 2 of the Crisis Centre Act prescribes that crisis centre services shall be offered to men and women separately, but does not specify this in more detail. Hence, it is up to the municipalities, depending on their financial situation and at their own

discretion, to decide how to organise the provision of such accommodation for women and men. This has resulted in some crisis centres having accommodation for women and men at the same address. The Ombud is also aware that at least one crisis centre had a shared common room for men and women in 2010. This gender-blind practice does not take into consideration the specific needs of battered women and does not recognise that men and women may be subject to different forms of domestic violence and hence be affected very differently by this and other forms of gender-based violence.

In addition, gender blindness can have detrimental consequences for women and girls seen in an intersectional perspective. For instance, if the shelters begin to receive men and women together, women and girls from immigrant backgrounds (a large group of current users of shelters) may feel that they, for religious and cultural reasons, can no longer come to the shelters (note). The Ombud takes a critical view of such co-location of crisis centre services.

The State Party should adopt a regulation that obligates local authorities to provide physically and geographically separate shelters for women and men. Furthermore, this requirement should be monitored in order to ensure compliance with the CEDAW.

4. Civil Society Participation

The State Party is failing to ensure women's non-governmental organisations' participation in the implementation of gender equality policies. During the last two decades, there has been a movement away from state-feminism in Norway that was characterized by a dynamic relationship between the state and civil society. The Ombud is therefore seriously concerned by the present situation that is characterized by a more top-down development of gender equality policies, on the one hand, and a marginalization of the women's movement, on the other.³²

The report of the Equality Commission confirms these concerns, and points out the absence of regular meetings between the authorities and gender equality organisations. The Commission also points out that the amount of economic resources allocated to gender equality organisations are significantly lower than resources allocated to organisations working with the grounds disability and ethnicity.

The Ombud questions whether these trends are in line with the CEDAW Convention.³³ A top-down development of gender equality policies may result in poorly informed gender equality measures that are not anchored in women's lived realities, thereby diminishing their chances for success. We are especially concerned about the lack of a real inclusion of the voices of vulnerable groups of women in the design, implementation and evaluation of policies. In addition, it is important that the gender knowledge needed for mainstreaming in practice is also developed in interaction with gender expertise *outside* of the administration such as NGOs, research milieus, the national apparatus for gender equality and other relevant actors.

- *The State Party should further develop its regular dialogue mechanisms with civil society and research milieus, and allocate resources to ensure that women’s organizations are able to play an active role in developing, implementing and monitoring gender equality policies.*

5. The Legal Protection against Discrimination

In addition to the proposed legislative changes in section 3 regarding the positive duty to promote equality, the Ombud has identified some weaknesses that need to be addressed in order to provide a better protection against discrimination and promotion of gender equality.

Lack of an explicit prohibition of multiple or intersectional discrimination

A weakness in today’s legislation is that it contains no separate provisions on multiple or intersectional discrimination addressing intersecting forms of discrimination and its compounded negative impact on women. An explicit prohibition would remove any doubts about the legal basis for considering several grounds together in enforcement. At the same time, a specific provision would send a strong message that multiple and intersectional discrimination requires targeted measures.

- *The State Party should adopt an explicit prohibition against intersectional and multiple discrimination.*

The lack of power to order financial compensation

The procedure in discrimination cases before the Ombud and the Tribunal is simple and free of charge and the parties can submit and argue their case themselves without a lawyer being required. However, the Tribunal lacks the power to order financial compensation. At the same time, however, it is these institutions that decide the overwhelming majority of discrimination cases, not the courts. Between 1985 and 2008, a total of 28 cases on gender-based discrimination were adjudicated in court (out of 45 discrimination cases in total). However, high lawyers’ fees are a deterrent for most claimants, and this is coupled with the risk of losing a discrimination case in court with the result that the losing party must cover the opposing party’s legal costs. The Ombud’s own analysis of complaint cases shows that the parties often arrive at an amicable solution after the Ombud has considered the case. In our opinion, the availability of meaningful remedies under the present system relies too much on the willingness of the parties to find a satisfactory settlement, disregarding the fact that the aggrieved woman may find herself in a weaker bargaining position than the employer and/or lack the necessary resources to obtain full satisfaction.³⁴

- *The Equality and Anti-Discrimination Tribunal should be able to award financial compensation in discrimination cases.*

The enforcement system is unsatisfactory in sexual harassment cases

It follows from the Gender Equality Act section 8 (a) that sexual harassment is prohibited, and that only the courts shall enforce this prohibition. The Ombud questions whether the

current system is good enough, as the risk involved in bringing a lawsuit is high. Almost no cases are brought before the courts. The Equality Commission has proposed that the Ombud and the Tribunal be able to enforce the provision against sexual harassment.

- *The state party should assess a low-threshold system for the enforcement of cases involving sexual harassment.*

¹ Likestilling 2014. Regjeringens handlingsplan for likestilling mellom kjønnene.

² Kristin Haraldsen. Health-related quality of life and pain in children and adolescents, the Norwegian KIDSCREEN study. Dissertation PhD. University of Bergen. 2011.

³ "Hvem bryr seg? En rapport om menns holdninger til vold mot kvinner". Amnesty International Norge og REFORM – ressurscenter for menn (2007). The investigation showed amongst other things that 30 percent of the men who were asked believe that if the woman was under the influence, it is she who bears the whole or part of the responsibility for the attack

⁴ Svein Mossige, Grete Dyb (eds.) NOVA- Norwegian Social Research. 2009, "Experiences of violence and sexual abuse among youth in Oslo"

⁵ Stefansen K. and Smette "Det var ikke en voldtekt, mer et overgrep..." Kvinners fortolkning av seksuelle overgrepssopplevelser. ("It was not a rape, but an attack..." Women's translation of their experience of sexual abuse.) I Tidsskrift for Samfunns forskning, no 1 2006 (p. 33–56).

⁶ <http://www.regjeringen.no/nb/dep/jd/aktuelt/nyheter/2011/har-fulgt-opp-voldtektstiltak-.html?id=661882>

⁷ Ertzeid, A.M. "Straffeloven § 192 om voldtekt – et supplement til pensum i spesiell strafferett". ("Criminal Act § 192 on rape – a supplement to the curriculum in special criminal law"). Jussens Venner 06/2006 (s. 337-370). Ballangrud, A.J. En analyse av straffeloven §§ 192 og 193 og den tilhørende rettspraksis. (An analyses of Criminal Act §§ 192 and 193 and the corresponding jurisprudence). Kvinnerettslig skriftserie 71/2007

⁸ The Director General of Public Prosecutions' report no 1 2007 "A study of the quality of indictment decisions in rape cases that resulted in acquittal etc."

⁹ For example, gross negligent rape instead of intentional rape, or the exploitation of an intellectually disabled person (penal code section 193) instead of rape. The cases in Rt. 2006 p 471, LA 2006-91599, LG 2007-80440, are examples of cases where the jury answered 'no' to the question of rape with intent and 'yes' to the question of grossly negligent rape. See also Ballangrud 2007, regarding cases on penal code section 193. The issue regarding section 193 is also raised in Proposition no 22 to the Odelsting (2008-2009), and in the Government's proposed new civil penal code, it is explicitly stated that the exploitation provision shall not be used if the conditions for the rape provision are met. The Ombud greatly appreciates the legislator's willingness to do something about this problem. It is important to ensure that the courts comply with this.

¹⁰ NOU 2011:13 Når sant skal skrives.

¹¹ <http://www.ssb.no/emner/06/01/innvregsys/tab-2011-06-28-01.html>

¹² Djuve og Tronstad 2011, Innvandrere i praksis

¹³ <http://www.ssb.no/emner/06/01/akutu/>

¹⁴ Reports from the crisis centres, Sentio Reaserch Norge, 2010. While ethnic Norwegian women spent 24 days on average at crisis centres in 2010, 30 days was the average length of stay for ethnic minority women (without reference to people trafficking victims).

¹⁵ Consultation with womens' shelter, see also Wenche Jonassen og Elin Skogøy "Et hjem for oss, et hjem for deg". En studie i endring i brukersammensetning og bruk av krisesentrene. Rapport 1/2010 NKVTS.

¹⁶ Dyrliid, L. og Berg, B (2008). Menneskehandelens ofre – Fra utnyttning til myndiggjøring. Evaluering av ROSA-prosjektet. Trondheim: NTNU Samfunnsforskning NTNU. According to the statistics from the crisis centres, the average length of stay for these women was 110 days according to the statistics from 2010 (Reports from the crisis centres, Sentio Research Norge 2010).

¹⁷ Jonassen og Skogøy 2010 s. 125 og Dyrliid og Berg 2008. Se også Brunovskis, Skilbrei og Tveit: Pusterom eller ny start? Evaluering av refleksjonsperioden for ofre for menneskehandel. Fafo-rapport 2010.

¹⁸ Nilsen og Prøis Ormset, Oslo Crisis Centre 2002. "Fra krisesenter til eget lokalmiljø".

¹⁹ Consultation with Oslo womens' shelter. The Ombud has also handled a case that confirms that lack of service coordination is still a fact.

²⁰ In 2010, 27 of a total of 50 crisis centres were equipped for use by persons with disabilities. Statistics from the crisis centres, Sentio Reaserch Norge 2010. Sju prosent av beboerne hadde nedsatt funksjonsevne i 2010.

²¹ The Committee on Violence against Women recommended in its White paper/report NOU 2003:31

²² Local government authorities had failed to notify the police about sexual abuse in 7 out of 15 cases reviewed by the newspaper *Dagbladet* in autumn 2010, despite having been notified or otherwise having grounds for suspecting such abuse.

²³ Handegård og Olsen: (Vanskelig å snakke om? Arbeidsmiljø og rettssikkerhet for utviklingshemmede i

skjermede virksomheter. 2009) (Difficult to talk about? Working environment and legal protection for persons with intellectual disabilities in enterprises for the vocationally disabled.

²⁴ NOU 2011:18, The Ombud's reviews and monitoring of 86 local authorities' compliance with their reporting obligations under the positive duty, the Mapping of local and regional Authorities by the The Center for Equality 2011.

²⁵ NOU 2011:18, 21

²⁶ General Recommendation No. 28 of the CEDAW Committee, § 28.

²⁷ Difi 2009

²⁸ NOU 2011:18 p 99

²⁹ NOU 2004:1 <http://www.ldo.no/no/Aktuelt/Nyheter/Arkiv/2008/Pensjonsreformen-vil-ramme-kvinner/>, 09/496-3-KOF, NOU 2011: 6 Et åpnere forskningssystem.

³⁰ Rundskriv R-3/2006, Hovedbudsjettsskriv for 2007

³¹ Local and regional authorities should implement the Government's policy of gender budgeting and commitments under the CEDAW Convention. Gender budgeting is also a central principle for local authorities who have signed the European Charter for Equality between Women and Men in Local Life.

http://www.ccre.org/docs/charte_egalite_no.pdf, and Norway's 8th report.

³² Hege Skjeie, Beatrice Halsaa, Anja Bredal. "The development of gender equality policy". 2010

³³ General Recommendation No. 28 of the CEDAW Committee, § 27.

³⁴ NOU 2011: 18