



**Comments submitted by Iceland  
on GREVIO's final report on the implementation  
of the Council of Europe Convention  
on preventing and combating violence  
against women and domestic violence  
(Baseline Report)**

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# **Comments on GREVIO's (final) report on the implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention)**

**Government of Iceland**  
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Comments on GREVIO's (final) report on the implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention)

November 2022

## Comments submitted by the Icelandic Government on GREVIO's (final) report on the implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention)

**Chapter 2. (Paragraph 18-21).** The Icelandic Government would like to reiterate that the entry into force of Act No 150/2020 on Equal Status and Equal Rights Irrespective of Gender, entailed the amendment that *multiple discrimination* (when an individual experiences discrimination on the basis of more than one of the reasons for discrimination listed in Acts No 150/2020 on Equal Status and Equal Rights Irrespective of Gender, 85/2018 Act on Equal Treatment outside the Labour Market or Act on Equal Treatment on the Labour Market 86/2018) is now specifically prohibited in order to promote more equality and increase the judicial protection of the most vulnerable groups of people. E. g. women with foreign origin and women with disabilities. Act No 151/2020 covers the administration of matters concerning equality across Acts No 150/2020, 85/2018 and 86/2018. It clarifies the role of the Directorate of Equality and the Equality Complaints Committee and thus ensures more complete oversight, increased efficiency and increased ability to handle multiple discrimination.

The Icelandic Government also wants to point out that the Act on Equal Treatment irrespective of Racial and Ethnic Origin was restricted to race and ethnic origin but with the 2022 legal amendments (law no. 63/2022), when more discrimination factors were added to the Act, the title was changed to *Act on Equal Treatment outside the Labour Market*. The English translation of the Act. no. 85/2018 has not yet been updated.

**Paragraph 40.** The Icelandic Government would like to reiterate that the majority of the NGO's who provide crucial services to victims of violence have secure funding. Several are on state budget, including the Women's shelter, Bjarkarhlíð Family Justice Center, Stígamót center for victims of sexual violence.

**Paragraph 44.** One of the actions of a working group on prevention and awareness raising on gender-based violence, appointed by the Minister of Justice in the beginning of 2022, is to strengthen Justice Centers for victims of violence in Iceland. An analysis is being made, by an impartial specialist, on the current situation of the services of the justice Centers. The specialist will make proposals for future arrangement and on the involvement of the Ministry of Welfare and Ministry of Justice, in the management of operation of the Justice Centers, regarding secured funding and the responsibility of the Government in their management. This will be done to prevent case-by-case involvement and to secure structural engagement. The Icelandic government is therefore aware that the involvement of NGOs on actions against gender-based violence must be formalized, and the above mentioned, analysis is a valuable part of that process.

**Paragraph 99.** The perpetrator program Heimilisfriður is currently being evaluated.

**Paragraph 125.** This, among other things, will be covered by a working group appointed by the Minister of Social Affairs and Labour Market, which has the role of making recommendations on how the legal and regulatory environment regarding services to victims of violence can be adjusted in accordance with the provisions of the Istanbul Convention.

**Paragraph 193.** The Icelandic Government does not agree with GREVIO's interpretation of art. 218. b. The article has not been viewed as only applying to former or current partners and former spouses unless they share a residence or in certain limited circumstances, as in the view of GREVIO. The article states both violence against current or former partners *or* cohabiting partner, which does not mean that both the former or current partner need to have shared a residence with the perpetrator, as GREVIO interprets the article.

