

Group of Experts on Action against
Violence against Women and Domestic
Violence (GREVIO)

Vår ref.
26/624 - 1

Deres ref

Dato
06.03.2026

Input from the Norwegian Equality and Anti-Discrimination Ombud to GREVIO's monitoring procedure of the implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence in Norway, 2026

The Norwegian Equality and Anti-Discrimination Ombud (the Ombud) appreciates the opportunity offered by the Council of Europe to provide input to GREVIO and to the monitoring of the implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (the Istanbul Convention) in Norway.

The Ombud's mandate and role are stipulated under the Norwegian Anti-Discrimination Ombud Act. Our mandate includes monitoring Norway's fulfilment of its human rights obligations under three UN conventions. The Ombud has an official role in ensuring that Norway upholds its human rights obligations in line with the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW); the Convention on the Elimination of All Forms of Racial Discrimination (CERD); and the Convention on the Rights of Persons with Disabilities (CRPD). We report directly to the UN on the extent to which the Norwegian government upholds these three conventions.

The Ombud also offers free guidance to individuals, employers and organisations. Organisations and employers may also contact us for guidance on how to prevent harassment or discrimination.

Below follows the Ombud's input to GREVIO's thematic evaluation round (*Building trust by delivering support, protection and justice*). Due to capacity considerations, we have chosen to highlight the issues we have had a particular focus on since the previous reporting cycle, and where we find it especially relevant to provide supplementary information to the authorities' report.

Summary of the Ombud's main points

Several important Norwegian public reports, political strategies and action plans on violence have been released since the authorities last reported to GREVIO.¹ At the same time, the extent of violence against women and domestic violence remains high and appears to be increasing.² We are concerned that the important knowledge gained through the authorities' work is not being used to generate concrete action through the development of legislative proposals or increased allocations to essential budget areas. It is therefore our assessment that the authorities' efforts to prevent and combat violence against women in general and against domestic violence in particular are progressing too slowly, and that funding in these areas is insufficient.

For the authorities to better protect women from all forms of violence, and to better prevent, prosecute, and eliminate violence against women and domestic violence, the Ombud believes that:

- A comprehensive national effort is needed to prevent and combat domestic violence and rape against women and girls. The work of following up and implementing recommendations and measures from committees and action plans must be given high priority, and sufficient financial resources must be allocated to this work. See pages 3-7 and 11-15.
- Legislative changes that affect victims of violence must be evaluated and, if necessary, reversed or amended. Gaps in legislation that negatively affect victims of violence must be closed. See pages 7-10.
- A gender perspective must be more clearly reflected in measures implemented by the authorities and in education given to children and adolescents—both to prevent harmful gender stereotypes and to ensure that measures and education are effective. See pages 16-18.

- Equal and accessible treatment services for perpetrators and victims of gender-based violence must be ensured. See pages 18 and 25.
- Increased resources and competence-building measures must be secured for support services regarding particularly at-risk groups, including women with disabilities, LGBTQ+ persons, older women and women with ethnic and national minority backgrounds, so that current barriers to providing and receiving adequate help are removed. See pages 19–22.
- Increased resources and competence-building measures must be secured for the police and prosecuting authorities. See pages 26–27.
- Legislative amendments should be implemented to prevent forced sterilisation and abortion. See pages 22–25.
- Legislative and practice-related changes should be implemented to ensure that women who lack an independent legal residence permit receive adequate protection from domestic violence. See pages 27-28.

Article 7 – Comprehensive and coordinated policies

Since the previous reporting to GREVIO, the authorities have, among other things, published the Escalation Plan against Violence and Abuse against Children and Domestic Violence; the Action Plan against Negative Social Control and Honour-Based Violence; and appointed a committee to review legal issues related to negative social control, honour-based violence, forced marriage, female genital mutilation, psychological violence and involuntary travel abroad. Furthermore, the authorities have appointed a committee to examine issues related to the prevention of rape, support services for rape victims and prosecution of rape cases (the Rape Committee); they have established a permanent partner-homicide commission; and the Norwegian National Human Rights Institution (NIM) has been given the special mandate to monitor Norway's implementation of the Istanbul Convention.³ This represents a positive development in the field of violence prevention.

At the same time, in the Ombud's assessment there are several challenges when it comes to the authorities' efforts to ensure an effective, comprehensive, and coordinated national policy, as discussed below.

Domestic violence

The Office of the Auditor General concluded in 2022 that there are still serious shortcomings in the authorities' efforts to combat domestic violence.⁴ Among other things, there are deficiencies in the authorities' coordination of support services. In addition, there are serious shortcomings at the municipal level, where much of the

responsibility for preventing and combating domestic violence lies.⁵ Studies show that municipal services are poorly coordinated, and that collaboration between relevant actors is inadequate. Several municipalities lack action plans against domestic violence, and many struggle to provide victims with comprehensive services during the re-establishment phase.⁶ Recent research also shows challenges related to post-separation violence or continued violence/abuse after separation, where the systems intended to support a victim after leaving their abuser may instead contribute to the continuation of abuse.⁷

Prevalence studies show that a relatively large percentage of the population has been subjected to severe partner violence, and that the prevalence of severe partner violence is increasing. In the latest prevalence study, 1 in 10 women and 3 in 100 men reported having been subjected to severe physical violence by a partner. More women now report having been subjected to severe physical violence by a current or former partner than previously. The most significant change is found among young women (between the ages of 18–29 years), where the number of those reporting severe partner violence has almost doubled. Men report approximately the same levels of partner violence as before.⁸ These findings underscore the fact that domestic violence is a clear gender equality challenge, and that preventive efforts have not had the intended effect.

Although action plans have been adopted and measures presented in various reports, the Ombud – like many other actors in the field – is concerned that the action plans and proposed measures are insufficiently binding and that progress is too slow.⁹ Regarding the Escalation Plan against Violence and Abuse against Children and Domestic Violence,¹⁰ the Ombud believes, among other things, that it is necessary to shift from recommendations to legally binding obligations. As it stands, the plan still only *encourages* municipalities to establish municipal or intermunicipal action plans,¹¹ and only 68 percent of municipalities had such plans as of 2023.¹² This despite the fact that municipal action plans have been recommended by the authorities for several years, as potentially effective tools to help municipalities meet their obligations to prevent, detect and avert domestic violence, and to ensure a more comprehensive and coordinated policy. Another measure proposed in the escalation plan is that models for municipal or intermunicipal cooperation on domestic violence should be examined. As far as the Ombud is aware, this work has been started but is not yet completed. The Ombud, along with other actors, believes that – in addition to this assessment – there must

be a statutory duty for municipalities to establish an interdisciplinary and interagency cooperation model or to appoint a domestic violence coordinator to assess and handle domestic violence cases. At present, no actor — other than crisis centres — has overall responsibility for assisting victims. A municipal violence team or coordinator would improve coordination and collaboration and ensure better follow-up of victims, including during the reestablishment phase.¹³ We believe progress on this is too slow.

The Ombud is also critical of the fact that efforts to combat negative social control and honour-related violence continue to be a left out of the overall strategy to combat domestic violence. Since the previous reporting to GREVIO, the government has launched a separate action plan against negative social control and honour-motivated violence and compiled an assessment of the legal issues relating to these topics in a separate, stand-alone report. Responsibility for these issues has been placed with the Ministry of Labour and Social Inclusion, while other efforts to combat violence in close relationships and violence against women fall primarily under the responsibility of the Ministry of Justice and Public Security. The Ombud believes that this approach may contribute to an unfortunate fragmentation, as GREVIO also concluded in its latest report to Norway in 2022.

Rape

The authorities have not succeeded in preventing or combating rape in Norway. We share the analysis put forward in the Rape Committee's report *NOU 2024: 4*, which concludes that the authorities have not succeeded in this work, and that rape is underprioritized with regard to allocation of public resources.

Prevalence studies show that levels of rape against girls and women are alarmingly high. In the most recent prevalence survey, twenty percent of Norwegian women and three percent of Norwegian men reported having been subjected to rape involving force or coercion, rape during sleep or combinations of these categories of rape.¹⁴ Rape therefore appears to be a serious and widespread problem, and a clear gender equality challenge.

As a societal and public health issue, rape is under-communicated and is given low priority in the allocation of public resources. This is consistent with criticism previously levelled at Norway by the CEDAW Committee, which has expressed

concern about the high incidence of sexual violence against women, see CEDAW Concluding observations on the tenth periodic report of Norway section 31 b).

Two major prevalence studies on violence and rape have been conducted in Norway, in 2013 and 2022. By comparing the surveys, researchers have recently concluded that there is a significant increase in reported cases of sexual violence and rape among women. The most significant change is seen among young women between the ages of 18–29 years, where the reporting of rape involving force or coercion has more than doubled. Nearly one in five women in this age group state that they have been raped with force or coercion.¹⁵

In addition to a substantial increase in reported cases of rape, The National Criminal Investigation Service (Kripos) and the Sexual Assault Centre in Oslo report noticeable changes in the cases they handle. Their casework indicates that over the past decade it has become relatively common for rapes to be filmed—either by the perpetrator or by others present during the assault—in addition to an increased use of strangulation and online sexual extortion. Another trend is that more people are present during the rape, either actively participating or observing. These factors contribute to further harm beyond the act of rape itself. Findings also show a strong correlation between rape during adolescence and self-harm or suicide attempts among young girls (13–18 years).¹⁶

The lack of political will to invest in the prevention of rape and other forms of sexual violence, spans over multiple government administrations. For example, no financial resources were allocated in the 2025 or 2026 national budgets for implementing the measures proposed by the Rape Committee. See page 10 for further details.

We therefore believe that there is significant untapped potential in the prevention of rape against girls and women, and that political prioritisation is urgent.

Technology-facilitated gender-based violence

The Ombud also finds that efforts targeting technology-facilitated violence are lacking—both as a dimension of other forms of violence and as a distinct form of violence against women and domestic violence, for instance deepfakes and sextortion. Rapid technological developments contribute to an increasing prevalence of technology-facilitated gender-based violence. This violence is continuously evolving and disproportionately affects girls and women, causing profound harm to victims. States parties have an obligation to deliver justice and protection, including

through adequate and efficient legal measures for victims of technology-facilitated gender-based violence.

Technology-facilitated violence is also a dimension of other forms of violence against girls and women. To ensure the development and implementation of measures that help prevent and combat this type of violence, long term investment in research is needed to illuminate existing challenges relating to both scope and form, while also capturing emerging trends. Further, resources must be allocated to evaluate already implemented measures to ensure effectiveness and precision.

Legislation

Regarding legislation, several changes have been made since the previous report to GREVIO. Nevertheless, we find that gaps remain which may weaken the situation of victims of violence, and that some of the changes introduced may also have negative consequences for women exposed to violence.

The Penal Code

Grooming

Section 306 of the Norwegian Penal Code regulates grooming, defined as situations where an individual has agreed to meet with a child under 16 years of age with the intention of committing a criminal offence.¹⁷

Sexual offences, including various forms of grooming, pose a serious threat to the life and safety of women and girls. Under the current Penal Code provision, criminal liability for grooming is contingent upon a physical meeting taking place. Specifically, the law requires the perpetrator to have “arrived at the meeting place or at a location from which the meeting place can be observed.” As a result, grooming that takes place exclusively in digital environments—even when it culminates in technology-facilitated sexual abuse—falls outside the scope of Section 306. Therefore, in the Ombud’s opinion, the Penal Code section 306 should be amended to also criminalise grooming on digital platforms which does not culminate in a physical meeting.

Introduction of a statutory provision on covert stalking

Stalking is currently covered by Penal Code sections 266, 266a, and 298 on reckless conduct. A prerequisite for criminal liability is that the person engaged in stalking is detected. Covert stalking is not currently punishable. However, similar to

criminalised stalking, covert stalking infringes upon women's right to privacy and constitutes a form of gender-based violence that particularly affects women.¹⁸ In 2021, the Ministry of Justice and Public Security circulated a proposal for public consultation to criminalise covert stalking. The consultation paper remains under consideration. The Ombud supported the Ministry's proposal to criminalise covert stalking and the amendments strengthening criminal law protection against intrusive photography and filming. There was broad agreement among consultation bodies to implement the proposed changes. The Ombud has raised this matter with the Ministry of Justice and Public Security several times and has called for progress, but the proposed changes have not yet been implemented.

Provisions on domestic violence (Penal Code sections 282 and 283)

The legislative committee responsible for *NOU 2024:13 Freedom and Law* assessed whether victims of honour-based violence and psychological violence have adequate legal protection in Norway.¹⁹ They concluded that the Penal Code provisions on abuse (§§ 282 and 283) meet the minimum legal requirements of Article 33 of the Istanbul Convention concerning criminalisation of psychological violence. However, they found that legal protection against psychological violence should be strengthened, as the current wording does not sufficiently clarify that abuse may occur solely through psychological acts. To ensure consistency and guarantee that cases involving psychological violence independent of physical violence can be prosecuted under the provision, the committee proposed clarifying that "other violations" include *both* physical and psychological violations. As far as the Ombud is aware, these changes have not yet been implemented.

The scope of Penal Code §§ 282 and 283 currently does not include relationships in which the involved parties are not living together or are married. The Ombud believes it is crucial that the law also covers relationships where the partners live separate from each other in order to address partner violence among adolescents, a phenomenon that recent research indicates is on the rise.²⁰ This amendment has not yet been implemented.

The rape provision in Penal Code section 291

In spring 2025, the Parliament (Stortinget) voted to amend the Penal Code so that section 291 now explicitly states that sex without consent is rape. The new wording states: "Anyone who engages in sexual intercourse with a person who has not

consented to it, either in word or conduct, shall be punished with imprisonment for up to 6 years.” The law has been in force since 1 July 2025.

The Ombud welcomes the amendment to section 291 and considers the change to bring Norwegian law more in line with Norway’s international obligations, including under the Istanbul Convention. The introduction of a “yes means yes” model as the first paragraph of the rape provision requires the implementation of measures relating to attitudes, education and competence across the entire criminal justice chain to ensure that the amendment has the intended effect.

So far as the Ombud is aware, no criminal cases under the new section 291 have yet been heard in court. This means that the consent requirement has not yet been applied in practice. The Ombud is concerned both that few rape cases are investigated and adjudicated, and that relevant services lack sufficient competence to apply the new consent-based provision. We are also concerned that few resources have been allocated to awareness raising campaigns, education, and competence building about the legal changes among the public, support services, and actors in the criminal justice chain. This may hinder the desired effect of the legislative amendment.

The Victim Compensation Act

Several amendments to the Victim Compensation Act, which entered into force on 1 January 2023, weaken legal protection and the right to compensation for women subjected to violence. The Ombud is particularly critical of the introduction of a requirement that applications for victim compensation must be submitted within one year of the final prosecutorial decision, final judgment, or binding settlement. We are further critical of the introduction of an absolute requirement that the case must have been reported to the police, and that the alleged perpetrator must be considered a party to the case.

That certain criminal acts no longer give entitlement to compensation—such as serious stalking, threats, and repeated breaches of restraining orders—is also a serious weakening of the law. In addition, stricter limitations have been introduced regarding which cases entitle victims to have their legal costs covered. The CEDAW Committee has expressed concern about these legislative changes.²¹ The amendments are under evaluation.²² The Ombud supports this evaluation and believes that the aforementioned changes should be reversed.

The Act relating to Children and Parents (the Children Act)

The new Children Act was adopted in 2025 despite strong protests from civil society, crisis centres, judges, and researchers in the field. The law is scheduled to enter into force in 2027.

The Ombud finds that the proposal for a new Children Act lacks a thorough assessment of the implications for victims of violence. The proposed main rule that all parents must have shared parental authority after separation represents a fundamental change to the legal framework. The Ombud is critical of the fact that apparently there has been no or little assessment with regard to how this amendment may affect victims of violence, and we are concerned that the situation of victims of violence has not been adequately considered in the drafting process. Furthermore, we are concerned that there apparently has been no assessment regarding whether the Act could include new provisions to protect victims of violence, for example, through the establishment of mechanisms to protect the victimised parent during the practical implementation of visitation with a violent parent.²³

The Legal Aid Act

Although the income thresholds for means-tested free legal aid have been increased, only a limited portion of the population is eligible for legal aid. The Act does not cover cases involving sexual harassment, serious stalking, or economic violence. Nor does it directly cover applications for independent residence permits under sections 53 (1) (b) and 53 (2) of the Act relating to the admission of foreign nationals into the realm and their stay here (Immigration Act).

Recommendations

- The work of following up and implementing recommendations and measures from committees and action plans must be prioritised.
- Authorities must ensure comprehensive support services in municipalities, such as implementing a legal duty to establish interdisciplinary, interagency cooperation /domestic-violence coordinators in municipalities, as well as the legal duty for municipalities to develop action plans against domestic violence.
- A comprehensive initiative must be launched to prevent rape of women and girls. This includes extensive, long-term awareness-raising campaigns,

strengthened sexuality education, and competence-building across all relevant services.

- To ensure adequate legal protection for victims of technology-facilitated violence, the state must develop and implement strategies for systematically assessing existing legislation, including its applicability and effectiveness in addressing all forms of such violence.
- Resources must be secured for long-term research on the nature and scope of technology-facilitated violence against women and girls, as well as emerging trends in this form of violence.
- Regarding grooming, the requirement of a physical meeting, or presence at a location from which the meeting place can be observed, must be removed from Penal Code section 306. Grooming that results in technology-facilitated sexual violence should also be explicitly criminalised as grooming in the Penal Code.
- The state must adopt a penal provision against covert stalking, in line with the 2021 consultation proposal, as soon as possible.
- The personal scope of the Penal Code's provisions on violence and abuse in close relationships (§§ 282 and 283) must include relationships in which the involved parties are not living together or married, and it must be clarified in the Penal Code that psychological violence alone is also punishable.
- An evaluation should be conducted with regard to how the new consent law functions in practice.
- The amendments to the Victim Compensation Act must be evaluated and reversed to ensure that victims have access to compensation, in accordance with requirements under the Istanbul Convention Article 30.
- The new Children Act should be evaluated as soon as possible, in light of the authorities' obligation to protect women and children from violence.
- The income threshold for means-tested free legal aid must be increased. In addition, the legal aid scheme must cover cases involving gender-based violence, including both digital and physical sexual violence, and various forms of violence in close relationships; cases involving sexual harassment; serious stalking; and economic violence. Legal aid should also be offered in cases involving applications for independent residence permits under sections 53 (1) (b) and 53 (2) of the Immigration Act, ensuring free legal aid regardless of income or assets.

Article 8 – Financial resources

Financing measures to prevent and combat violence against women and violence in close relationships

As mentioned, the Ombud is concerned that the important knowledge generated in Norwegian public reports and government strategies is not translated into concrete action—neither in legislative amendments nor through increased allocations to essential budget areas.

Financing new policies in the field of violence

The Rape Committee

The analysis presented by the Rape Committee in *NOU 2024: 4 – Rape: An Unresolved Societal Problem*²⁴ shows that the current situation is very serious: Norway has not succeeded in preventing or combating rape, and rape is underprioritized in the allocation of public resources. The Committee proposed 30 measures for the government to follow up, grouped under comprehensive and coordinated policy, prevention, support services, prosecution, and research. The Ombud has emphasised that this report should not serve merely as background knowledge, but as a basis for concrete measures and adequate resources to address this major gender-equality and societal challenge. However, we cannot see that the follow-up of the Committee's report has been prioritised in the 2025 or 2026 national budgets, nor that funding has been set aside for implementing the proposed measures.

The consent-based provision

The Ombud believes that the introduction of a consent-based rape provision requires the implementation of measures related to attitudes, education, and competence—both among the general public and within essential services. No resources have been earmarked in recent budgets for awareness campaigns or strengthened initiatives in schools or other educational settings.

The police have received increased funding in recent budgets, but there has been no earmarking for work on sexual violence, technology-facilitated violence, or domestic violence. We cannot see that the introduction of the consent-based provision has had any budgetary consequences.

Sexuality education

For years, the Ombud, civil society, and various expert committees have argued that a national initiative is needed to strengthen sexuality education.²⁵ However, no earmarked resources have been allocated to ensure such a national effort.

The Escalation Plan against Violence and Abuse against Children and Domestic Violence (2024–2028)

The Escalation Plan (2024–2028) includes more than 122 concrete measures across several areas of focus.²⁶ The Ombud is concerned that the plan lacks a binding and detailed financing plan to ensure swift implementation of adopted measures. It is difficult to track the measures in the national budgets, and the Ombud has not been able to identify any actual financial scaling-up related to this plan in the 2026 national budget.

Financing of voluntary and non-profit organisations

The Ombud believes that voluntary and non-profit organisations that contribute to prevention, aftercare, and support for victims of violence must be ensured increased and predictable funding through the state budget.

Hence, it is concerning that several organisations have lost earmarked budget allocations in recent years. Increasingly, grant schemes for civil society are being merged into larger and more general funding schemes. These structural changes have created a situation where organisations and services have to compete for the same grants, requiring them to spend significant time and resources on application and reporting processes. When grant schemes become large and general, it also becomes more difficult to identify and hold authorities accountable for cuts to specific services.

For several years now, the government has proposed cuts to the grant scheme for special legal aid measures. If implemented, these cuts would, among other things, affect organisations like *Legal Counselling for Women (JURK)*, which provides free legal assistance to women exposed to violence and works politically to advance women's rights, including within the field of violence. The proposed cut to JURK was not implemented in the 2026 budget, as it was reversed during budget negotiations. However, the grant was not adjusted for inflation, which in practice amounts to a cut. In the 2026 budget, the Crisis Centre Secretariat also lost its earmarked funding and must now apply through a larger grant scheme for measures against violence and

abuse. For organisations supporting migrant women and girls, the MiRA Centre²⁷ lost its earmarked allocation in 2026.²⁸

Financing of crisis centre services

Crisis centre services for victims of violence are currently neither equal in quality nor easily accessible for all users.

In a survey conducted by the Centre for Equality KUN (2019), only half of crisis centres reported having sufficient resources to run and manage their services. One quarter reported having “somewhat sufficient” resources. Recently, crisis centres reported being forced to turn away victims due to capacity issues.²⁹ Statistics Norway also shows considerable variation in municipal spending on crisis centres, from NOK 43 to NOK 256 per resident in 2022.³⁰ In many cases, crisis centre services are being cut to the bone, staffing is reduced, and in the worst cases, centres are being closed or facing closure. In a geographically elongated country like Norway, this is serious, as it may result in extremely long travel distances for some residents to their nearest crisis centre.³¹ Research shows that longer travel distances reduce the likelihood that victims seek help.³² Crisis centres also report insufficient staffing, and several centres lack 24-hour coverage.³³

Studies further show that some crisis centre services remain inaccessible for certain user groups, including LGBTQ+ persons, elderly victims, victims with active substance use, persons with disabilities, and victims with a Sámi background. Research also shows that many municipalities struggle with follow-up of victims during the reestablishment phase, which is a responsibility shared between the municipalities and crisis centres.³⁴

The CEDAW Committee noted in its 2023 concluding observations to Norway that there are disparities in crisis centre services across the country, resulting in unequal access to protection. The Committee recommended that authorities ensure increased resources for crisis centres, see CEDAW Concluding observations on the tenth periodic report of Norway section 31 e).

Today, authorities have delegated the responsibility for financing and organising crisis centre services to the municipalities—even though municipal budgets nationwide are under significant pressure. As illustrated above, spending varies significantly across municipalities, and several crisis centres experience insufficient

funding. Therefore, to ensure adequate funding on the state level, the Ombud believes that the authorities should consider changing the financing model. Crisis centres face significant costs associated with ensuring universal design. Moreover, many centres need to upgrade their facilities in order to offer suitable separate units for men and men with children, for users with active substance use, and for users with severe cognitive or mental health challenges who cannot reside in communal settings. Currently, some centres turn away users who need separate units.

In the 2026 fiscal budget, NOK 20.74 million was set aside to continue a grant scheme established in 2025 for an upgrading of crisis centre buildings. However, in the previous year, applications submitted for building upgrades totalled 64.7 million, while only NOK 20 million was awarded. Therefore, the Ombud believes that the allocated funds are insufficient.

Recommendations

- Ensure the allocation of funds and resources to implement the measures proposed by the Rape Committee and the Escalation Plan against Violence and Abuse against Children and Domestic Violence.
- Ensure strengthened and comprehensive sexuality education by allocating resources for an actual investment throughout the entire education system.
- Implement measures relating to attitudes, education, and competence—both in the general population and in essential services—to increase awareness and understanding of the new consent-based law.
- Authorities must take on a more proactive approach in their support of civil society by ensuring the introduction of a multi-year, earmarked operating grant for organisations working to prevent and combat violence.
- Ensure increased funding for crisis centres so that crisis centre services become robust and equal nationwide, and accessible to all user groups.
- Allocate sufficient funding in the state budget to ensure that crisis centre buildings are upgraded in accordance with universal design requirements, and to ensure that centres have separate units for residents who cannot live communally.

Article 12 and 14 – General obligations and education

Gender stereotypes

Domestic violence and rape have a profound impact on the lives and health of girls and women in Norway, and they affect girls' and women's ability to participate in society. As outlined above, women and girls are subjected to significantly higher levels of severe domestic violence and rape than men. The prevalence is also increasing among women, while remaining low among men in recent years.

The CEDAW Committee has criticised Norway for lacking a gender perspective when addressing these challenges. The Committee has expressed concern that gender neutral policies may hinder efforts to protect women from discrimination and to achieve substantive equality.³⁵

Research shows an increase in sexual violence, particularly among adolescents. Girls and women are especially vulnerable to sexual violence, and such violence is predominantly perpetrated by boys and men.³⁶

This development has prompted the Ombud to raise concerns that technological developments and our use of technology reinforce harmful gender stereotypes. For example, such stereotypes are widely disseminated through the vast volume of violent pornography available online, as well as through the growing production of pornographic deepfakes. As with pornography more broadly, the content of violent pornography and pornographic deepfakes is highly gendered.³⁷ Despite the harm caused by sexual violence and the underlying notions of women's subordination to men, violent pornography remains easily accessible to children and adolescents.

Vocational teacher education

The Ministry of Education and Research is currently developing a new overarching framework plan for vocational teacher education. A proposal for a new framework plan will be submitted for public consultation. So far, competence related to violence and abuse has not been incorporated into the plan.

In the ombud's opinion, the absence of competence goals on violence and abuse in the overarching framework plan increases the risk that future teachers will lack essential knowledge about violence and abuse, and about their role and responsibility in safeguarding children's right to protection.

Furthermore, the Ombud is concerned that if this topic is not included in the overarching section, there may be significant variation in how teacher education programs ensure that future teachers and early childhood educators develop sufficient competence and skills to actively promote a safe and supportive learning environment. This also includes the practical capacity to work preventively and to respond appropriately to suspicions of violence and sexual abuse.

In cooperation with other stakeholders, the Ombud is advocating for the inclusion of competence on violence and abuse in the ministry's proposal for a new overarching framework plan for vocational teacher education.

Sexuality education

Current sexuality education in schools appears fragmented, inconsistent, and inadequate. Surveys conducted by a Norwegian centre specializing in sexual and reproductive health and rights Sex and Society (*Sex og samfunn*)³⁸ show that many pupils experience sexuality education as insufficient. In an extensive survey from 2022 based on responses from approximately 10,000 students, around half of the respondents stated that the quality of the sexuality education was substandard.³⁹ *The Women's Health Committee (NOU 2023: 5)*, *the Rape Committee (NOU 2024: 4)* and *the White Paper on Sexual Harassment, Meld. St. 7 (2024–2025)* all conclude that a national boost to sexuality education is needed. Findings indicate that only a limited proportion of students perceive the current teaching as adequate. The same survey also indicates high demand for more and better sexuality education. Approximately seven out of ten students wanted more teaching, especially on topics such as boundaries, emotions, and relationships. Together, the findings point to a clear need for development both in scope and content, emphasising the importance of a more comprehensive and knowledge-based approach in schools.

In some parts of the country, such as Oslo, parts of sexuality education are provided by private organisations like *Sex and Society*. While the quality of their program is high, the organisation is small, with limited staff and financial resources, and it lacks the capacity to reach the entire country. The Ombud also believes that, as a matter of principle, the state should carry the primary responsibility for sexuality education—either by increasing support to organisations working in the field, or by assuming greater responsibility through the regular school system.

The Ombud finds that a great deal of expertise on sexuality education exists in Norway. The problem is the current fragmentation of responsibility across different professions and agencies, making it difficult to establish a unified plan to improve sexuality education.

Sexuality education must encompass a wide range of topics such as puberty, positive sexuality, menstruation, and sexually transmitted infections, rape and sexual abuse. It is highly problematic if today's children and adolescents do not receive thorough education on these essential topics, especially in light of the mass exposure to content from large technology platforms that spread (mis)information about sex, bodies, and emotions, and given that (violent) pornography with highly problematic content is only a click away.

Recommendation

- It is essential that domestic violence and rape are described as gender-based violence that disproportionately affects girls and women. The gender perspective must be reflected in the measures implemented by the authorities, especially in the prevention of domestic violence and rape.
- A comprehensive plan with concrete measures must be developed to improve sexuality education for all students in Norway, and resources must be allocated to develop necessary guidelines, learning objectives, and curricula.
- Ensure that sexuality education consistently reflects that technology-facilitated violence is a gendered phenomenon that disproportionately affects girls and women.
- To combat harmful gender stereotypes, a minimum standard for sexuality education should be established, including teaching about technology-facilitated violence against women and girls.
- Include competence on violence and abuse in the overarching framework plan for vocational teacher education.

Article 16 – Preventive intervention and treatment programmes

Treatment services for perpetrators of violence

There are significant regional disparities in treatment services for perpetrators of domestic violence. The organisation *Alternative to Violence (ATV)* is among the few actors offering specialised treatment for perpetrators. However, only municipalities with agreements with an ATV office have access to these services. In addition to

ATV, some other organisations provide specialised treatment, but prevalence studies show that such services are only available in certain areas of the country. Specialist health services also report that they are unable to provide adequate treatment to perpetrators of domestic violence.⁴⁰

The Ombud therefore believes that treatment services for perpetrators of domestic violence must be strengthened. No comprehensive evaluation of treatment services for perpetrators has been conducted, even though GREVIO recommended such an evaluation in its 2022 report to Norway.

Recommendations

- An evaluation should be conducted of existing treatment services for perpetrators of domestic violence, how these interact and function, and what challenges and gaps exist.
- Equal access to treatment services for perpetrators of violence across the country must be ensured.

Article 20 – General support services

Measures to ensure equal services for women victims of gender-based violence and prevent intersectional discrimination

Women experience intersecting and overlapping forms of discrimination, including on the basis of ethnicity, disability, sexual orientation, gender identity, and/or religion. These factors may reinforce each other negatively. This also means that gender-based violence may affect women differently and to varying degrees. The CEDAW Committee has emphasised that states have an obligation to develop and implement specific legal and policy measures to protect women subjected to intersectional discrimination.⁴¹

Women with ethnic minority backgrounds

We know that a majority of crisis centre users are women with ethnic minority backgrounds. Furthermore, the Partner Homicide Committee's report shows that a significant number of both victims and perpetrators had an immigrant background.⁴² Persons with ethnic minority backgrounds may also be particularly vulnerable when seeking help after experiencing violence. This can be due to the victim's limited language skills or lacks knowledge of, or trust in, support services. Research also shows that public services often fail to use qualified interpreters,⁴³ that support

services lack resources in languages other than Norwegian and English, and that cultural competence in services is insufficient.⁴⁴

Women with disabilities

Women with disabilities are more often exposed to sexual abuse and domestic violence than the general population. They are also particularly vulnerable to abuse from persons they depend on or have close relationships with, such as healthcare workers or other caregivers.⁴⁵ This increases the need for knowledge among service providers about risk factors, as well as implementation of appropriate protection measures for this group.

However, reports show a lack of competence, limited understanding, and low awareness of violence against persons with disabilities in support services.⁴⁶ Research also indicates that crisis centres lack sufficient competence regarding the needs of persons with cognitive and mental disabilities. Additionally, many crisis centres are physically inaccessible, making them unsuitable for persons with impairments.

LGBTQ+ persons

Research indicates that LGBTQ+ persons—and persons who challenge gender stereotypes or socially accepted gender roles—may be somewhat more exposed to domestic violence than the general population. LGBTQ+ persons with minority backgrounds may be particularly vulnerable, partly because support services often lack sufficient competence in this field.⁴⁷

LGBTQ+ persons also face significantly higher levels of hate speech than the general population, particularly transgender and non-binary persons, as well as LGBTQ+ persons with ethnic minority backgrounds. Many report being met with inadequate competence in public services.⁴⁸ Such negative experiences can increase insecurity when accessing help as victims of violence.

There is also a lack of research and statistical information regarding the prevalence of different forms of violence among LGBTQ+ persons. For example, no Norwegian studies compare rates of domestic violence within LGBTQ+ and heterosexual populations, respectively.⁴⁹ This lack of knowledge limits the ability to design targeted measures. Crisis centre services also vary significantly in their degree of adaptation to LGBTQ+ persons.

Older women

A national prevalence study shows that violence against older persons is a serious societal and public-health problem. The study also found that few older victims had been in contact with support services.⁵⁰ Regarding older women with ethnic minority backgrounds, recent research shows they face multiple obstacles when seeking help. These may include language obstacles, digital competency requirements, and a lack of universal design.⁵¹

Sámi women

Prevalence of violence and abuse in Sámi communities is high—and higher than in the majority population. Historical Norwegian assimilation policies have contributed to mistrust of public authorities among many Sámi persons.⁵² Sámi persons also report experiencing discrimination and marginalisation in their encounters with public services, which in turn may discourage reporting violence to the police or support services.

Additionally, it can be difficult to seek local support services in small communities because it can easily become known in the community. To secure adequate assistance to victims of violence within the Sami community, culturally and linguistically competent support services are crucial.

Although measures have been implemented to improve support for Sámi victims, the only Sámi crisis and incest centre was closed in 2019. A satellite solution is planned in the region (Karasjok), with specialized expertise in Sami language and culture, but as far as the Ombud is aware, this is not yet operational.

The Norwegian *Domestic Violence Helpline* currently offers services in Norwegian and English. To our knowledge, no anonymous helpline exists where users can communicate in Sámi. The Ombud has previously recommended that the Ministry of Justice and Public Security consider establishing an anonymous helpline by, with and for the Sami population, for instance linked to the existing helpline and where the staff has competency in Sami language and culture. This could lower the threshold for Sami victims of violence to ask for help. As far as we know, this has not been implemented.

Support for incarcerated women with experiences of violence and abuse

Research shows that the proportion of incarcerated women with experiences of violence and abuse is high. For example, six out of ten incarcerated women report having been raped as adults.⁵³ In the report *Hidden Within the Prison – Women Prisoners with Health Needs*, a clinical psychologist stated she was not aware of any female patient in the prison who had not experienced abuse.⁵⁴

According to the Mandela Rules (Rules 7 and 25),⁵⁵ authorities must ensure that such women receive legal and psychological assistance.

During a supervisory visit in November 2025 to Bredtveit Prison (Ullersmo section), one of Norway's two high-security women's prisons, the Ombud found that neither the prison nor its health services screen for experiences of violence, abuse, or trauma.

Forced sterilisation

Under the Sterilisation Act, a guardian may apply for sterilisation on behalf of a person with a severe mental disorder or intellectual disability who "does not have the ability to take a position on the procedure," and when recovery or significant improvement cannot be expected.⁵⁶ The Ombud is concerned that the structure of the law creates a risk that women with disabilities may be subjected to forced sterilisation.

The Directorate of Health has stated that sterilisation should not be performed using coercion, but has also noted that it can be extremely difficult for persons lacking decision-making capacity to express whether they consent to the procedure.⁵⁷

In autumn 2025, a supervisory report revealed that women with intellectual disabilities undergoing dental treatment at a regional hospital (Sørlandet Hospital) were placed under anaesthesia and fitted with intrauterine devices (IUDs) without assessing their decision-making capacity.⁵⁸ One of the key findings was that "consent from a guardian or relative is used as consent to healthcare. No decision-making capacity assessments were found in the reviewed medical records."⁵⁹

Both the Ministry of Justice and the Directorate of Health have since recommended revising the Sterilisation Act, but no changes have yet been made.⁶⁰

In 2019 and 2023, the CRPD and CEDAW Committees respectively, have expressed concern that women in Norway are subjected to involuntary medical procedures, including sterilisation. The CEDAW Committee recommended that Norway prohibit sterilisation without free and informed consent.⁶¹ The CRPD Committee recommended that Norway introduce measures to protect women's right to informed consent and ensure access to supported decision-making.⁶² GREVIO, in 2022, also criticised Norway for lacking a clear criminal provision against forced sterilisation and recommended that authorities criminalise sterilisation without free and informed consent.⁶³ The Ombud shares their concern and agrees with the recommendations.

Besides statistics on the number of sterilisation applications involving persons with intellectual disabilities there is, to our knowledge, no survey or research examining how such persons' consent has been evaluated, nor their experiences. Based on the weaknesses described above, the Ombud believes the Sterilisation Act poses a risk of discrimination and may result in serious, irreversible violations of women's bodily integrity. In our assessment, we have also taken into account the recommendations to Norway from GREVIO, the CRPD Committee, and the CEDAW Committee. We therefore recommend that the legal authorisation for sterilisation must be removed and replaced with supported decision-making frameworks.⁶⁴ A criminal provision against forced sterilisation must also be introduced.

Forced abortion

Norway implemented a new Abortion Act on 1 June 2025. Although the law clarifies that abortion must not be carried out using coercion, section 9 still allows a guardian to apply for abortion on behalf of a woman with an intellectual disability and/or severe mental disorder. In the Ombud's opinion, this section poses a risk, in that an abortion may take place without the woman's free and informed consent, which the CEDAW Committee, the CRPD Committee, and GREVIO have also expressed concern about. GREVIO has further pointed out that it is problematic that Norway does not have legal provisions explicitly prohibiting forced abortions. Furthermore, the Norwegian authorities have reported to GREVIO that the police also lack practical tools or guidelines for handling cases of forced abortion.

Authorities have also reported to GREVIO that the police lack practical tools or guidelines for handling cases involving forced abortion.

During the legislative process in 2024, the Ombud requested statistics from the Abortion Registry concerning abortions involving women with disabilities. Data from the Norwegian Institute of Public Health showed that between 2013 and 2023, the County Governor approved 60 cases under section 9 (b) of the old Abortion Act and 151 cases under section 9 (c)—a total of 211 cases. These statistics were not publicly available. The Norwegian Parliament has since ordered the government to publish statistics on the use of section 9 under the new Act,⁶ but, to our knowledge, no such statistics have been published.

The Ombud is concerned about the absence of public data relating to these cases, as well as the lack of investigations into the women's circumstances and whether their rights to autonomy and due process were safeguarded.

Another concern with the new Abortion Act is that the County Governor no longer receives information about assessments of a disabled woman's decision-making capacity. This responsibility now lies with healthcare professionals, who must assess whether the conditions for abortion are met. While the intention may be good, this creates a risk that decision-making capacity assessments will not be conducted thoroughly and that these assessments are not subject to review. In light of the Sørlandet Hospital case concerning the lack of assessments of decision-making competence when inserting an IUD under anaesthesia, the Ombud is concerned that assessments and decisions regarding abortion involving women with disabilities are not documented or reviewed sufficiently with regard to their legal safeguards. Hence, it is the Ombud's opinion that the Abortion Act poses a risk of discrimination by enabling forced abortions for women with disabilities. In our assessment, we have also taken into account the recommendations to Norway from GREVIO, the CRPD Committee, and the CEDAW Committee. The legal provision allowing guardians to apply for an abortion on behalf of women with disabilities must be removed and replaced with supported decision-making structures.⁶⁵ A criminal provision against forced abortion must also be introduced. Furthermore, public statistics under section 9 must be made public and previous cases must be reviewed. Assessments and decisions concerning abortion in cases involving women who lack decision-making capacity, must also be documented and subject to review.

Recommendations

- Increased resources and competence-building efforts must be secured for support services assisting particularly vulnerable groups, including women with disabilities, LGBTQ+ persons, older women, and women with ethnic or national minority backgrounds.
- Funding should be allocated to strengthen research on particularly vulnerable groups, including groups with legal protection against discrimination, such as LGBTQ+ persons.
- Health services in women's prisons must screen for experiences of violence and abuse and actively offer both psychological and legal support.
- To prevent forced sterilisation, authorities must revise and remove legal authorisations allowing irreversible procedures to be performed on persons lacking or having reduced decision-making capacity and replace these authorizations with replaced with supported decision-making systems.
- Authorities must investigate how the legal safeguards of persons sterilised under section 4 of the Sterilisation Act have been upheld.
- Legal provisions enabling forced abortion due to disability must be removed and replaced with supported decision-making frameworks.
- Authorities must investigate how the procedural rights of persons subjected to abortion under section 9 of the Abortion Act are safeguarded.

Article 25 – Support services for victims of sexual violence

Mental health services for victims of violence and abuse

Rates of mental health challenges are higher among victims of sexual abuse and domestic violence.⁶⁶ Access to treatment for the psychological harms caused by violence and rape may be crucial in reducing long-term effects for individuals and society.

The Rape Committee notes that many victims who approach their general practitioner and request referral to specialist health services have their requests denied. Those who are accepted often face long waiting lists. Despite sexual assault centres being required to ensure psychosocial follow-up, the Committee found significant variation in follow-up practices among the centres.⁶⁷

Recommendation

- Victims of violence and abuse must have access to prompt mental health services, regardless of where they live.

Article 49 and 50 – Immediate response, prevention, and protection

Investigation and prosecution in cases of rape and domestic violence

Rape

There are challenges with regard to the police and prosecution authorities' handling of sexual violence and rape. In the most recent prevalence study on domestic violence and rape, 82 percent of victims who experienced rape involving force/coercion, intoxication rape, or technology-facilitated sexual violence reported that the police were unaware of the incident. Of the cases known to police, only 43 percent were investigated, and of these, only 41 percent proceeded to trial. This means that among cases reported to the police, fewer than one in four resulted in prosecution and conviction. Among the total of 630 respondents who reported rape, intoxication rape, and/or technology-facilitated violence, only 4 percent said their case went to court and resulted in conviction.⁶⁸

Statistics from the Director of Public Prosecutions and the Rape Committee also show low clearance rates in rape cases and an increase in acquittals. This is partly due to insufficient resources within the police. Cases are also handled by officers and prosecutors lacking specialised competence. The specialist unit for sexual violence at the National Criminal Investigation Service (Kripos), was closed in 2019. As mentioned above, no resources have been allocated following the introduction of the consent-based law to ensure competence-building across the criminal-justice chain such as investigators, prosecutors, lawyers, judges, healthcare personnel, and others in contact with rape survivors. This may negatively affect victims who report such crimes.

Domestic violence

There are also major challenges in the police and prosecution authorities' handling of domestic violence. Case-processing times are long, and the rate of dismissed cases are increasing. In 2021, 86 percent of prosecuted cases of domestic violence were dropped.⁶⁹ Few victims of severe physical violence choose to report, and

among those who do, few see their case processed.⁷⁰ Again, insufficient resources is a key obstacle.

Research further shows that the police do not sufficiently use the SARA (Spousal Assault Risk Assessment Guide) or PATRIARK (risk assessment for honour-based violence) tools, largely due to resource and time constraints in police districts. Research and civil society also indicate that restraining orders/contact bans are not adequately enforced.⁷¹

Applications for independent residence permits

Under Section 53 (1) b of the Immigration Act, a person residing in Norway on the basis of family reunification who is subjected to abuse in the relationship has, upon application, the right to residence on an independent basis. This provision is in line with obligations under Article 59 of the Istanbul Convention. The Norwegian Directorate of Immigration (UDI) processes these applications.

In a report from autumn 2025, the Ombud examined whether the provision and its application, in individual cases, provide sufficient protection for women who experience domestic violence when they come to Norway through family reunification. In this connection, we requested access to all applications for residence on an independent basis due to abuse in the relationship that were denied by UDI in 2022 and 2023. In particular, we wished to examine whether the threshold for what is considered abuse within the meaning of the Immigration Act is set too high in these refusals, both in light of the legislature's intention behind the provision and our human rights obligations.

Our assessment is that we cannot conclude that there is a gap between the wording of the legal provision and the requirements arising from Article 59 of the Istanbul Convention. Nevertheless, we believe that the cases reveal weaknesses in the wording of the law that may have negative consequences for women subjected to violence. Among other things, we believe that the concept of abuse should be defined more clearly in the law in order to ensure more consistent practice and to ensure that the threshold for granting residence in practice does not become too high.

With regard to the practice of the immigration authorities, we find that in several cases the threshold for what is considered abuse under Section 53 (1) b of the

Immigration Act appears to be too high in light of human rights requirements and the legislature's intention. This applies in particular to applicants who have experienced sexual violence, various forms of control, isolation, technology-facilitated violence, and economic violence, as well as applicants who have experienced one or a few incidents of physical violence (primarily strangulation) in combination with other forms of violence. We are also concerned about whether UDI sufficiently takes into account situations in which the applicant has been subjected to multiple forms of violence simultaneously, and whether it sufficiently considers the power imbalance in the relationship and the applicant's vulnerable life situation as a newly arrived immigrant.

At the same time, we find that several of the cases appear to be insufficiently investigated and that the reasoning in UDI's decisions is often inadequate. This makes it difficult to determine how serious the violence actually was and whether UDI has assessed the incidents in the manner required by law. We also believe that the requirement that the abuse must have resulted in a reduced quality of life should be removed. Our review of practice shows that this requirement is difficult to assess and apply, which contributes to reduced predictability for those affected. It may also lead to the threshold becoming higher than intended.

If the threshold for what is considered abuse under Section 53 (1) b of the Immigration Act is in practice too high, this may mean that women of foreign origin without an independent residence permit are not sufficiently protected against domestic violence. It may also mean that these women in reality receive weaker protection against domestic violence than other residents.⁷²

Civil society organizations also report that the possibility of applying for residence on an independent basis is not widely known. Furthermore, they experience that women refrain from reporting violence out of fear of losing their residence permit.⁷³

Recommendations

- Reinstate The National Criminal Investigation Service specialist unit on rape.
- Reinstate specialised investigation and prosecution units for sexual offences in every police district.
- Ensure sufficient resources in the police to strengthen the investigative capacity for rape, domestic violence, and digital violence.

- Ensure sufficient resources so that police districts can meet their obligations to conduct risk assessments using SARA and PATRIARK.
- Increase the use of restraining orders and ensure that violations result in real consequences.
- Allocate resources for competence-building in the prosecution of domestic violence and sexual violence, especially with regard to the new consent-based law.
- Lower the threshold applied by The Norwegian Directorate of Immigration (UDI) in assessments under section 53 (1) (b) of the Immigration Act.
- Amend the wording of the Immigration Act section 53 (1) (b) to explicitly include psychological and sexual violence, with detailed guidance provided in regulations. Remove the requirement that abuse must have reduced the applicant's quality of life.
- Ensure that all persons arriving in Norway on the basis of family immigration have both the right and the obligation to receive training under section 8 of the Integration Act, including education about their rights as victims of violence and their rights under section 53 (1) of the Immigration Act.

Kind regards,

May Schwartz

deputy director general

Ingeborg Aa. Fjeldstad

senior adviser

The document is electronically approved and valid without a signature.

Reference list

[1] Among the documents published are:

– Escalation Plan against Violence and Abuse against Children and Domestic Violence (2024–2028): <https://www.regjeringen.no/no/dokumenter/prop.-36-s-20232024/id3018905/?ch=2>

– *Sjef i eget liv* – Strengthened Efforts against Negative Social Control and Honour-Based Violence (2025–2028): <https://www.regjeringen.no/no/dokumenter/handlingsplan-mot-negativ-sosial->

kontroll-og-aresmotivert-vold-sjef-i-eget-liv-styrket-innsats-mot-negativ-sosial-
kontroll-og-aresmotivert-vold-2025-2028/id3100799/?ch=1

– NOU 2024: 13 *Law and Freedom* – Negative Social Control, Honour-Based Violence, Forced Marriage, Female Genital Mutilation, Psychological Violence and Involuntary Stays Abroad – Legal Issues and Proposed Legislative Amendments: <https://www.regjeringen.no/no/dokumenter/nou-2024-13/id3046261/>
– Rape Committee: <https://www.regjeringen.no/no/dokumenter/nou-2024-4/id3028553/>

[2] NKVTS (2025): <https://link.springer.com/article/10.1186/s12889-025-22763-8>

[3] References identical to [1].

[4] Office of the Auditor General (2022), p. 8:
<https://www.riksrevisjonen.no/globalassets/rapporter/no-2021-2022/myndighetenes-innsats-mot-vold-i-naere-relasjoner2.pdf>

[5] Office of the Auditor General (2022), p. 10;
<https://www.riksrevisjonen.no/globalassets/rapporter/no-2021-2022/myndighetenes-innsats-mot-vold-i-naere-relasjoner2.pdf>
NKVTS (2021), p. 4
<https://ldo.no/content/uploads/2024/06/Kommunenes-helhetlige-arbeid-med-vold-mot-kvinner-og-vold-i-naere-relasjoner-2021.pdf>

[6] NKVTS (2021), p. 4; <https://ldo.no/content/uploads/2024/06/Kommunenes-helhetlige-arbeid-med-vold-mot-kvinner-og-vold-i-naere-relasjoner-2021.pdf> NKVTS (2024): <https://www.nkvts.no/rapport/krisesentre-som-arena-for-stotte-oppfolging-og-bevisstgjoring/>

[7] Margunn Bjørnholt (2024): <https://www.scup.com/doi/10.18261/tfv.27.1.1>

[8] NKVTS (2025): <https://link.springer.com/article/10.1186/s12889-025-22763-8>
“The proportion of women reporting physical partner violence almost doubled in 2022 compared with 2013 among the youngest age group (from 4.4% to 7.8%).”

[9] See various consultation responses:
<https://www.stortinget.no/no/Hva-skjer-pa-Stortinget/Horing/horing/?h=10005013>

Civil society shadow report (2025):

<https://foreninger.uio.no/jurk/publikasjoner/l%20skyggerapporter%20til%20istanbulkonvensjonen/usivilsamfunnets-skyggerapport-til-istanbulkonvensjonen-2025---rapport-1.pdf>

[10] Escalation Plan (2024–2028):

<https://www.regjeringen.no/no/dokumenter/prop.-36-s-20232024/id3018905>

[11] In 2024, the Parliament (Stortinget) asked the government to consider making municipal action plans mandatory. No such law has been introduced yet.

[12] Civil Society Shadow Report (2025), p. 13:

<https://foreninger.uio.no/jurk/publikasjoner/l%20skyggerapporter%20til%20istanbulkonvensjonen/usivilsamfunnets-skyggerapport-til-istanbulkonvensjonen-2025---rapport-1.pdf>

[13] <https://www.regjeringen.no/no/dokumenter/nou-2020-17/id2791522>

[14] NKVTS (2021), p. 71: <https://www.nkvts.no/rapport/omfang-av-vold-og-overgrep-i-den-norske-befolkningen>

[15] Note: Rape during sleep was not measured in 2013. [16] NIPH (2026):

<https://www.fhi.no/publ/2026/sammenhengen-mellom-voldtekt-selvskading-og-selvmordsforsok-blant-unge-jenter/#sammendrag>

[17] Penal Code provisions referred to: §§ 299–304, § 305 (b), § 311 (1)(a)

[18] Penal Code: https://lovdata.no/dokument/NLE/lov/2005-05-20-28/#*h [19] NOU

2024: 13 – *Law and Freedom*: <https://www.regjeringen.no/no/dokumenter/nou-2024-13/id3046261/?ch=3#kap7-6-1h> [20]

NKVTS (2024): “Nesten innafor”: <https://www.nkvts.no/rapport/nesten-innafor-seksuell-vold-og-krenkelser-i-unges-naere-relasjoner/>

[21] CEDAW (2023), para. 18: <https://docs.un.org/en/CEDAW/C/NOR/CO/10>

[22] <https://www.regjeringen.no/no/aktuelt/evaluering-av-ny-valdserstatningslov/id3085347/>

[23] The Equality and Anti-discrimination Ombud' consultation response (2025):

<https://www.regjeringen.no/no/dokumenter/horing-ny-barnelov-likestill-foreldreskap-og-felles-omsorg-for-barn-etter-samlivsbrudd/id3045729/?uid=4db137da-04c2-4717-ba56-433d27544994>

[24] Rape Committee (2024): <https://www.regjeringen.no/no/dokumenter/nou-2024-4/id3028553/h>

[25] Women's Health Committee (NOU 2023: 5), Rape Committee (NOU 2024: 4), White Paper on Sexual Harassment (Meld. St. 7, 2024–2025)

[26] Escalation Plan: <https://www.regjeringen.no/no/dokumenter/prop.-36-s-20232024/id3018905/?ch=1>

[27] The MiRA Centre is a meeting place for women and girls with minority backgrounds, providing legal assistance, network activities, courses and advocacy.

[28] Prop. 1 S (2025–2026): <https://www.regjeringen.no/no/dokumenter/prop.-1-s-20252026/id3123553/>

[29] NRK: <https://www.nrk.no/innlandet/krisesenter-har-mattet-si-nei-til-personer-som-har-bedt-om-hjelp-1.17710261>

[30] Statistics Norway (2023): <https://www.ssb.no/sosiale-forhold-og-kriminalitet/trygd-og-stonad/statistikk/okonomisk-sosialhjelp/artikler/det-kostet-mer-for-kommunene-a-ha-et-krisesentertilbud>

[31] Crisis centre statistics: <https://www.krisesenter.com/krisesenterstatistikken-2023/>

[32] https://www.ldo.no/globalassets/_ldo_2019/_arrangementer/kommunenes-voldsarbeid_rapport_15juni2021.pdf. GREVIO also noted travel distance as a barrier (2022): <https://rm.coe.int/grevio-inf-2022-30-report-norway-eng-pour-publication/1680a923f8>

[33] KUN (2019), p. 77: <https://kun.no/publikasjoner/kommunenes-krisesentertilbud-en-kunnskapsoversikt>

[34] GREVIO (2022): <https://rm.coe.int/grevio-inf-2022-30-report-norway-eng-pour-publication/1680a923f8>

[35] CEDAW Concluding observations on the tenth periodic report of Norway (2023) section 14: <https://docs.un.org/en/CEDAW/C/NOR/CO/10>

[36] Frøyland et al. (2023): <https://hdl.handle.net/11250/3083676>

[37] Vera-Grey et al. (2021):
https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4380281

[38] Sex og samfunn: <https://sexogsamfunn.no/om/>

[39] Sex og samfunn (2022): <https://sexogsamfunn.no/wp-content/uploads/2022/02/Rapport-seksualitetsundervisning-i-skolen.pdf>

[40] NKVTS (2016): <https://www.nkvts.no/rapport/behandlingstilbudet-til-voksne-som-utover-vold-en-nasjonal-kartleggingsundersokelse/>

[41] CEDAW – General recommendation No. 33 on women’s access to justice section 8

[42] NOU 2020:17 – Partner Homicide Committee:
<https://www.regjeringen.no/no/dokumenter/nou-2020-17/id2791522/?ch=3#kap6-4-5-1>

[43] IMDi (2023): <https://kommunikasjon.ntb.no/pressemelding/18002986/for-mye-bruk-av-ukvalifiserte-tolker-i-det-offentlige?publisherId=89626&lang=no>

[44] NIM (2024) *Videre etter vold?*: <https://www.nhri.no/rapport/videre-etter-vold/5-kunnskap-og-kompetanse-i-hjelpetjenestene/>

[45] <https://www.bufdir.no/statistikk-og-analyse/funksjonsnedsettelse/vold-overgrep/>

[46] <https://www.bufdir.no/statistikk-og-analyse/funksjonsnedsettelse/vold-overgrep/>

[47] Bredal (2020):

<https://press.nordicopenaccess.no/index.php/noasp/catalog/book/99>

[48] Anderssen et al. (2021): <https://skeivkunnskap.no/referanser/anderssen-n-m-fl-2021-seksuell-orientering-kjonns mangfold-og-levekar-resultater-fra-sporreundersokelsen-2020-nordlandsforskning/>

[49] <https://www.bufdir.no/statistikk-og-analyse/LHBT/lhbt-vold/>

[50] NKVTS (2017): <https://www.nkvts.no/rapport/vold-og-overgrep-mot-eldre-personer-i-norge-en-nasjonal-forekomststudie/>

[51] Fafo (2025): <https://www.fafo.no/prosjekter/fullforte-prosjekter/vold-mot-eldre-med-minoritetsbakgrunn>

[52] NOU 2020:17 - Partner Homicide Committee:

<https://www.regjeringen.no/no/dokumenter/nou-2020-17/id2791522/?ch=3#kap6-4-5-1>

[53] Hellebust et al. (2021): https://www.ido.no/globalassets/_ldo_2019/_bilder-til-nye-nettsider/rapporter/lengst-inne-i-fengselet.pdf

[54] Scharff & Lundeborg (2023): <https://www.idunn.no/doi/10.18261/kj.49.1.5>

[55] UN Bangkok Rules: https://www.unodc.org/documents/justice-and-prison-reform/Bangkok_Rules_ENG_22032015.pdf

[56] Sterilisation Act § 4 (3)

[57] Directorate of Health, circular:

<https://www.helsedirektoratet.no/rundskriv/steriliseringsloven-med-kommentarer/sterilisering#id-4-fremsettelse-av-begjaering-eller-soknad>

[58] NRK (25.09.2025): https://www.nrk.no/sorlandet/tilsynsrapport_-ulovlig-bruk-av-tvang-ved-gynekologisk-avdeling-1.17581978

[59] County Governor's report (29.09.2025):

<https://www.statsforvalteren.no/siteassets/fm-agder/dokument-agder/helse-omsorg-og-sosialtjenester/tilsyn/endelig-rapport-fra-tilsyn-med-tvungen-somatisk-helsehjelp-ved-sorlandet-sykehus-hf---gynekologisk-avdeling-arendal.pdf>

[60] Norway's report to GREVIO (s. 22): <https://rm.coe.int/state-report-first-thematic-evaluation-norway/488028b5e1>

[61] CEDAW (2023) *Concluding observations on the tenth periodic report of Norway*, p. 15: https://digitallibrary.un.org/record/4007525/files/CEDAW_C_NOR_CO_10-EN.pdf?ln=en

[62] CRPD (2019) *Concluding observations on the first periodic report of Norway* p. 8: <https://www.regjeringen.no/contentassets/26633b70910a44049dc065af217cb201/crpd-2019-avsluttende-bemerkninger-til-norges-forste-rapport-nor-09092019-finale.pdf>

[63] GREVIO (2022), p. 55: <https://rm.coe.int/grevio-inf-2022-30-report-norway-eng-pour-publication/1680a923f8>

[64] CRPD Committee noted that the Sterilisation Act predates the CRPD and should be reformed.

[65] CRPD Committee noted that the Sterilisation Act predates the CRPD and should be reformed.

[66] NKVTS (2023):

https://www.nkvts.no/content/uploads/2023/11/NKVTS_Rapport_1_23_Omfang_vold_overgrep.pdf

[67] *Rape – An Unresolved Societal Problem* (2024), p. 125:

<https://kudos.dfo.no/documents/81143/files/37760.pdf>

[68] NKVTS (2023), p. 138:

https://www.nkvts.no/content/uploads/2023/11/NKVTS_Rapport_1_23_Omfang_vold_overgrep.pdf

[69] Office of the Auditor General (2022), pp. 14, 58:

<https://www.riksrevisjonen.no/globalassets/rapporter/no-2021-2022/myndighetenes-innsats-mot-vold-i-nare-relasjoner2.pdf>

[70] NKVTS (2023):

https://www.nkvts.no/content/uploads/2023/11/NKVTS_Rapport_1_23_Omfang_vold_overgrep.pdf

[71] Menon Economics (2025), p. 38:

<https://www.oslomet.no/forskning/forskningsnyheter/for-daarlig-haandheving-av-besoeksforbud>

Civil society shadow report (2025):

[https://foreninger.uio.no/jurk/publikasjoner/I%20skyggerapporter%20til%20Istanbul konvensjonen/usivilsamfunnets-skyggerapport-til-istanbulkonvensjonen-2025--- rapport-1.pdf](https://foreninger.uio.no/jurk/publikasjoner/I%20skyggerapporter%20til%20Istanbul%20konvensjonen/usivilsamfunnets-skyggerapport-til-istanbulkonvensjonen-2025---rapport-1.pdf)

[72] The Equality and Anti-Discrimination Ombud (2025) *Between abuse and legal residency*:

https://ldo.no/content/uploads/2025/09/LDO_Mellom_vold_og_opphold_elektronisk_versjon.pdf

[73] Civil Society Shadow Report (2025), p. 43:

[https://foreninger.uio.no/jurk/publikasjoner/I%20skyggerapporter%20til%20Istanbul konvensjonen/usivilsamfunnets-skyggerapport-til-istanbulkonvensjonen-2025--- rapport-1.pdf](https://foreninger.uio.no/jurk/publikasjoner/I%20skyggerapporter%20til%20Istanbul%20konvensjonen/usivilsamfunnets-skyggerapport-til-istanbulkonvensjonen-2025---rapport-1.pdf)