

2025

Norwegian Civil Society's Shadow Report no. 1 on the Istanbul Convention

*First thematic evaluation round:
"Building trust by delivering support, protection and justice"*



Preface

The Council of Europe Convention on preventing and combating violence against women and domestic violence (hereinafter “the Convention”) is a ground-breaking framework in the fight to ensure a life free from violence and abuse for all. The Convention is based on a key recognition that violence and abuse especially affect women and girls.

In order for the Convention to be an effective tool in the prevention of violence and abuse, States must implement specific and targeted measures to back up their commitments. This requires both political action and strong collaboration between the authorities and civil society.

In addition, implementation requires continuous effort over time. The monitoring and reporting processes managed by GREVIO are a key mechanism in ensuring such continuity. Furthermore, these monitoring and reporting processes help hold authorities accountable for their compliance with the Convention.

At the same time, it is important to consider the status quo of violence from multiple perspectives. Civil society organisations assisting women and other groups who are victims of violence play an important role in this work. These organisations not only contribute to compliance with the Convention, but also highlight real-life challenges and experiences from this field.

As part of the thematic reporting round, Norwegian civil society has therefore prepared a shadow report to supplement the report prepared by the Government. We hope that this report provides a broader and more nuanced picture of the practical implementation of the Convention in Norway. This report has been prepared with funding from the Ministry of Justice and Public Security. Work on the report completed on 06/11/2025.

The coordinating organisations – Legal Counselling for Women (JURK), the Secretariat of the Shelter Movement (KSS) and the Norwegian Women's Public Health Association (NKS) – would like to thank the Council of Europe and GREVIO for the opportunity to contribute to the Convention's monitoring mechanism. We look forward to the evaluation process and are at GREVIO's disposal if there should be any further questions or anything that requires clarification.

Sincerely,

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Introduction

General overview – current status of violence in Norway

Violence and abuse are a serious societal problem in Norway. Despite the commitment of Norwegian authorities to prevent and reduce gender-based violence, developments since the last evaluation round show that the situation has got worse in several areas. Among other things, new prevalence surveys show that one in five women report having experienced rape, which is a marked increase from previous levels.¹ At the same time, one in ten women have experienced serious intimate partner violence². This violence does not only affect the individual; ripple effects are felt through generations. The costs are borne by the victims and those close to them, but also by the healthcare system, employers, the voluntary sector and society in general.

In recent years, Norway has seen an alarming increase in the number of intimate partner murders, and nine out of ten victims are women.³ At the same time, clearance rates for domestic violence and rape cases are going down, and the percentage of cases that are dropped is concerningly high. In addition, multiple legislative amendments have weakened the legal position of victims of violence. A consistent problem is the absence of any clear gender perspective in the development of policies, regulations and measures. This weakens the ability of our authorities to accurately analyse and address societal problems. Furthermore, a lack of coordinated data collection means that key aspects of violence issues are not accurately reflected in official statistics.

In recent years, our government's action against domestic violence and rape have been heavily criticised by multiple expert committees, including the Government-appointed Rape Committee (*Voldtekstutvalget*)⁴ and the Office of the Auditor General (*Riksrevisjonen*)⁵. These experts have clearly expressed that, despite violence and abuse reportedly being areas of priority for our government's policies, the Government has failed to take action to prevent and fight violence and abuse in Norway. It is pointed out that these phenomena are under-communicated as societal problems and problems for public health, and that they generally are not

¹ NKVTS (2023), p. 71.

² NKVTS (2023), p. 100.

³ Brenna (2025).

⁴ NOU 2024: 4.

⁵ Office of the Auditor General (2022).

prioritised in the allocation of public resources⁶, despite the socioeconomic cost of domestic violence being estimated at NOK 93 billion in 2021.⁷

As these problems increase, civil organisations report increasingly limiting constraints for their work to reduce violence. The current funding model for crisis shelters means the sector is vulnerable to cuts due to tight municipal budgets. Multiple shelters have been closed in recent years, and other services aimed at victims and perpetrators of violence have also experienced frequent budget cuts. Civil society also reports that assistive services for victims of violence are often perceived as fragmented, complex and poorly coordinated.

There are, however, some positive developments. Amendments in the statutory provisions concerning rape, where a lack of freely given consent is now the defining element, is a key step forward.⁸ The same applies to amendments granting the police a wider authority to impose so-called reverse personal security alarms⁹, as well as the establishment of a permanent intimate partner murder commission to strengthen prevention efforts in this area.¹⁰ Multiple expert committees have been appointed in recent years, providing a more comprehensive knowledge base of different types of violence, abuse and exploitation. Nevertheless, these measures are not enough, given the scope of domestic violence and sexualised violence.

Norway has not yet incorporated the Istanbul Convention into domestic law. When the Convention's provisions do not take precedence if its provisions conflict with other legislation, it is a clear indication of political unwillingness to prioritise the fight against violence.

A unified civil society points out that a far more ambitious and comprehensive effort is needed to combat the serious societal problems of violence and abuse in Norway. We hope this report will contribute to putting these issues on the agenda and mark a change of pace in the fight against violence and abuse in Norway.

Methods

In our preparation of this report, we have focused on highlighting developmental trends in violence since the last report. This report therefore focuses heavily on the

⁶ NOU 2024: 4 p. 102.

⁷ Menon Economics (2023) p. 6.

⁸ The Ministry of Justice and Public Security (2025a) and Penal code § 291.

⁹ Chapter 17 d of the Criminal Procedure Act.

¹⁰ The Ministry of Justice and Public Security (2025a).

situation in the period 2020–2025.

This shadow report has been prepared by 21 Norwegian non-governmental organisations, each contributing expertise from their respective fields. The report reflects the challenges we believe the Norwegian civil society is facing in terms of violence and offers concrete recommendations for measures we believe our Government should implement for better compliance with the Convention.

This work was coordinated by Legal Counselling for Women (JURK), the Secretariat for the Shelter Movement (KSS), and the Norwegian Women's Public Health Association (NKS). JURK is an independent legal aid organisation. We offer free legal aid to all women in Norway, and we work to promote gender equality and make all women better aware of their legal rights. KSS is an umbrella organisation for crisis shelters in Norway that works towards a future without domestic violence, violence against women and human trafficking, as well as towards strengthening shelter services in Norway. NKS is Norway's largest women's organisation that works to promote women's health and better living conditions, including combating violence against women.

Norwegian civil society has based its preparation of this report on GREVIO's questionnaire to authorities. A translated, plain language questionnaire was made available to civil society and non-profit organisations, along with an invitation for input. This input has been collected, processed and supplemented by the coordinating organisations. In connection with their processing of the input, the coordinating organisations also communicated closely with researchers and other stakeholders in this field to gain a better understanding of the themes highlighted by civil society in its input.

A draft report was sent out for consultation to all of the organisations that had been invited to provide input, allowing them to submit corrections or join the report in its entirety. The completed report has been signed by 32 organisations. All organisations involved have been listed below.

Contributors to the shadow report

Civil society organisations that have contributed input to the civil society shadow report:

JURK (Legal Counselling for Women), Secretariat for the Shelter Movement (KSS),

Norwegian Women's Public Health Association (NKS), Aldri Alene/Omsorgsjuss, Caritas Norway, Foreningen mot psykisk vold, Norwegian Federation of Organisations of Persons with Disabilities (FFO), Jussbuss, Krisesenteret i Midt-Troms, Norwegian Association Against Sexual Abuse (LMSO), Centre for Equality, KUN Centre for Equality and Diversity, Equality, Inclusion and Network (LIN), MiRa Centre, Norwegian Women's Lobby, Oslo Crisis Shelter and Competence Centre for Domestic Violence, Oslo Red Cross/Red Cross Helpline on Negative Social Control and Honour-related Violence, Save the Children Norway, Alternative to Violence (ATV), Stopp Diskrimineringen, and VAKE - kirkelig ressurscenter mot seksuelle overgrep.

Other organisations that have joined the report in its entirety:

Amnesty International Norway, Norwegian Center against Racism, Hjelpekilden Norge, Women's Front of Norway, Women's International League for Peace and Freedom Norway (IKFF), Norwegian Association for Women's Rights, Nok. Norge, Norwegian Organisation for Asylum Seekers (NOAS), Sex og samfunn, Soroptimist International Norway, and Stine Sofies Stiftelse.

Challenges in preparations for the shadow report

One main issue in the preparations for this shadow report for the thematic evaluation round (Building trust by delivering support, protection and justice) has been that the reporting cycle coincided with the periodic evaluation round for GREVIO and State recommendations from the baseline evaluation round. Norwegian civil society has therefore been forced to prepare two complete shadow reports in the same time frame. The fact that many of the same articles have been addressed in the two different reporting cycles/questionnaires has also been a source of confusion among the civil society organisations that have been asked to contribute input. While the Government's official report on the thematic evaluation round was published in October 2025, time constraints did not allow for Norwegian civil society to prepare its thematic shadow report based on the official report, due to the fact that preparations for the shadow report were already in their final phase when the official report became available.

Another challenge was the fact that the invitation to prepare a shadow report came with a very short deadline, in early summer 2025. In practice, this meant that many Norwegian civil society organisations were unavailable at the beginning of the period due to summer holidays. Because Norwegian civil society was given a relatively short time frame in which to prepare input for two relatively

comprehensive questionnaires, we could have missed out on important information because we were unable to procure it in time. As the two reporting processes were concurrent, they will provide the most accurate depiction of violence in Norway if read in context.

In recent years, we have seen negative developments in areas that are relevant to the Convention, but that are not covered directly by the questionnaire for the thematic evaluation. This includes protection for victims of financial harm and fraud (Article 3), protection against stalking and surveillance (Article 34), access to compensation (Article 30), and access to effective enforcement of cases involving sexual harassment (Article 40). Civil society has opted to include these topics in the final chapter of the report, entitled “Emerging Trends”, to ensure that GREVIO receives the most comprehensive picture of violence in Norway today.

Article 7: Comprehensive and coordinated policies

National action plans, committees, reports and legislative amendments

Norwegian civil society recognises the Government’s efforts and initiatives against violence in its Escalation Plan against Violence and Abuse against Children and Domestic Violence (2024–2028); establishment of the Rape Committee and introduction of new, consent-based rape legislation; establishment of the Commission for Intimate Partner Homicides; and establishment of the Commission on Negative Social Control, Honour-Based Violence, Forced Marriage, Genital Mutilation and Psychological Violence and the subsequent action plan against negative social control and honour-motivated violence (2025–2028).

One issue with this effort, involving action plans, official reports and legislative amendments, is that it takes too long. A wave of intimate partner homicides in late 2023 and 2024 clearly illustrated that we urgently need effective measures against gender-based violence and femicide, but it is the experience of Norwegian civil society that the implementation of recommendations from evaluations take a disproportionately long time. As an example, the Commission on Negative Social Control included multiple specific proposals for legislative amendments in its report in 2024, but none of these recommendations had been taken any further as at November 2025. Multiple other official reports from recent years, including the report prepared by the Commission on Intimate Partner Homicide, also include specific proposals for measures. These should be given top priority.

The last action plan against rape and sexual violence ended in 2022, and no new plan has yet been prepared. At the same time, recent statistics show that the share of women who report having experienced rape is as high as one in five.¹¹ The Rape Committee presented its report in 2024. The report included several specific measures to reduce rape, but Norwegian civil society cannot see that the Government has implemented any effective measures in accordance with the report to reduce the prevalence of rape. At the same time, Norwegian civil society would like to point out that the amendments to penal provisions concerning rape, which took effect in the summer of 2025, are a key step forward in terms of strengthening the legal position of rape victims.¹²

The Escalation Plan against Violence and Abuse against Children and Domestic Violence is more comprehensive than previous plans.¹³ Nevertheless, multiple consultation parties pointed out that the plan is non-specific and non-committal, and that sufficient financial resources have not been allocated for the implementation of the measures. The first official report, presented in 2025, shows that 25 measures had been implemented, 74 were pending, and 23 measures had not yet been started.¹⁴

Municipal action plans

Currently, municipalities are not required to prepare action plans against domestic violence. Only 68 percent of municipalities reported having prepared municipal or intermunicipal action plans against domestic violence in 2023.¹⁵ In 2024, Parliament asked the Government to propose draft legislation for this and to send the proposal out for consultation by the spring of 2025. Norwegian civil society is not aware of any such draft legislation having been prepared. While it is positive that initiatives have been made to explore new legislation, it is essential that this work be given higher priority.

The Norwegian Centre for Violence and Traumatic Stress Studies (NKVTS) has developed guidelines for the preparation of action plans against domestic violence, which municipalities can use in the preparation of their own municipal action

¹¹ NKVTS (2023), p. 71.

¹² For a more detailed account of this amendment, see the Norwegian civil society shadow report (2025) on the "Reporting form on the implementation of the recommendations addressed to state parties", under "Recommendation A.11, IC-CP/INF (2022) 13: Consent-based rape legislation."

¹³ Prop. 36 S (2023–2024).

¹⁴ The Ministry of Justice and Public Security (2025b).

¹⁵ Aas-Hansen (2025).

plans.¹⁶ Norwegian civil society believes that any new legislation should be based on the NKVTS guidelines, to ensure that municipal action plans are anchored in best practices. Research shows, however, that action plans alone are not sufficient, unless they are followed by earmarked allocations and sufficient economic resources.¹⁷ The legislation should therefore include a duty for municipalities to ensure sufficient funding and follow-up of municipal action plans.

At-risk groups have poorer access to services

It is well-documented that violence affects women with additional challenges more severely than women who do not have other challenges beyond the violence itself.¹⁸ However, assistive services are less accessible by many of these groups. Several groups of women who experience violence, such as women with addition problems, women with immigrant backgrounds, women with mental health problems, and women with physical or intellectual disabilities, often have highly limited, or in some cases non-existent, access to shelters and other assistive services.¹⁹

On gender-neutral language

The language in Norwegian policies and legislation on violence is consistently gender-neutral. When legislation and political initiatives are prepared without acknowledging the perspectives of women and girls, they will be less accurate. A gender-neutral practice may contribute to an obfuscation of structural causes behind violence and weaken the effect of preventive measures.

GREVIO has pointed this out on multiple occasions, most recently in the previous Baseline Evaluation Report on Norway.²⁰ The UN Committee on the Elimination of Discrimination against Women (CEDAW) has expressed concerns that Norway's gender-neutral policies and legislation may lead to insufficient protection for women and their unique needs.²¹ Multiple respondents from civil society have expressed concerns that gender-neutral language and legislation undermine the gender perspective in efforts to reduce violence and challenges the principle of centring the victim's needs. Furthermore, the Government's plan for its efforts

¹⁶ NKVTS (2022).

¹⁷ NKVTS (2019) p. 61.

¹⁸ NKVTS (2010) p. 7–9, and Elvegård et al. (2019) p. 20–22.

¹⁹ For a more detailed description of services accessible by these groups, see the chapters on Article 8 and Articles 18/20, as well as Norwegian civil society shadow report (2025) on the "Reporting form on the implementation of the recommendations addressed to state parties" on Article 4.

²⁰ GREVIO (2022) p. 10–11.

²¹ CEDAW (2023) p. 3–4.

against violence also does not have a gender perspective. Instead, its title is “Escalation Plan against Violence and Abuse against Children and Domestic Violence”.

Recommendations:

- The authorities must ensure actual compliance with existing legislation and plans. New legislation must be followed up by specific plans for implementation.
- National and local action plans must include specific measures with a realistic timeline for implementation.
- Municipal action plans against domestic violence must become required by law as soon as possible. These plans must reflect NKVTS’s guidelines and, among other things, include outlines for a specific pathway for how to support victims of violence.
- Measures proposed by relevant expert committees must be given top priority and followed up with concrete legislative proposals and implementation plans.
- Work on a new action plan against rape should begin as soon as possible.
- The language used in connection with gender equality and violence issues should be gender-specific to accurately reflect and highlight women’s unique challenges. Phrasings concerning women’s unique position in the Equality and Anti-Discrimination Act should be retained.

Article 8: Financial resources

Despite what seems to be considerable political agreement that efforts to prevent violence should be strengthened, Norwegian civil society report a gradual dismantling and deprioritisation of violence in budget allocations. While several action plans and escalation plans have been developed to address violence as a societal problem, these are not followed up with sufficient allocations in public budgets. The proposal for the Norwegian National Budget for 2026 does not allocate any dedicated resources for the implementation of measures proposed in the escalation plan. Nor have any new resources been allocated for long-term funding of volunteer organisations or coordination of measures.

Among other things, Norwegian civil society emphasises that insufficient funding

for implementation of the Government's strategy for sexual health²², as well as insufficient earmarked resources for sexual education, will weaken prevention efforts aimed at sexual violence and abuse. Furthermore, no resources have been allocated²³ for implementation of consent-based rape legislation, adopted in the spring of 2025, despite funding being essential for the amendment to have the desired preventive and awareness-raising effect. The proposed cut of NOK 20 million for legal aid measures will affect initiatives like JURK, which, among other things, provides legal aid for women who are victims of violence.²⁴ In addition, no part of the increase in resources allocated to the police in the proposal for the 2026 budget have been earmarked for investigation and prosecution of cases involving violence in close relationships or sexual crimes.²⁵

This state of funding overall is an indication that violence and abuse against women is not a priority, despite prevention of such violence and abuse being an express political objective.

The role and framework conditions of volunteer organisations

Volunteer organisations play a pivotal role in the effort to prevent and reduce violence against women and domestic violence. At the same time, Norwegian civil society believes that the current framework conditions for volunteer organisations are not strong enough.

The fight against domestic violence is an on-going process that requires predictability, continuity and trust, especially in order to sufficiently protect the interests of vulnerable groups of victims. However, the collaboration between the public sector and volunteer organisation is described as unstructured and too dependent on dedicated individuals. Norwegian civil society reports a lack of mechanisms to ensure long-term and predictable funding for organisations working with at-risk groups. As a consequence of this, the ability to handle complex and time-consuming cases is weakened.

The Government claims that allocations for the fight against violence are not reduced but rather redistributed and reprioritised to strengthen certain focus

²² Ministry of Health and Care Services (2025).

²³ Prop. 1 S (2025–2026) For the budget year 2026 – National Budget. For a more detailed account of this amendment, see the Norwegian civil society shadow report (2025) on the "Reporting form on the implementation of the recommendations addressed to state parties", under "Recommendation A.11, IC-CP/Inf (2022) 13: Consent-based rape legislation."

²⁴ Prop. 1 S (2025–2026) For the budget year 2026 under the Ministry of Justice and Public Security.

²⁵ Prop. 1 S (2025–2026) For the budget year 2026 under the Ministry of Justice and Public Security.

areas. Norwegian civil society, however, find that the Government does not take into account the significant increase in the number of people who have experienced domestic violence in the past five years, nor that this increase ties up capacity and resources in assistive services. Refraining from making cuts in the funding of volunteer assistive services is therefore not sufficient to meet the actual needs for assistance.

We need earmarked funds and paid management in order to ensure continuity and professional expertise over time, as volunteer efforts alone cannot be sustained over time. Civil society calls for a financial lift for the field and more long-term, predictable solutions. Three-year grants are considered a minimum to ensure stable operations and professional development.

In the proposed National Budget for 2026, multiple organisations working in violence-prevention lose their earmarked funding, having to instead apply for grants from a shared pool. When different services have to compete for funding from a shared pool, it is not only detrimental to the stability and predictability of important services; it also means these services have to spend more time and resources on application and reporting work. In addition, it will be more difficult for Norwegian civil society to hold the Government accountable for cuts in specific services over time.

On efforts to combat negative social control and honour-based violence

In recent years, Norwegian authorities have strengthened their efforts to combat negative social control and honour-based violence, among other things through the action plans *Freedom from negative social control and honour-based violence (2021–2024)*²⁶ and *In Charge of Your Own Life – Strengthened Efforts against Negative Social Control and Honour-Motivated Violence*²⁷. We have also seen a certain increase in resources, including Directorate of Integration and Diversity (IMDi) diversity advisers, special representatives and funding for volunteer organisations as part of the integration strategy.

Norwegian civil society supports this strengthened effort, but would also like to point out that collaboration with public sector and civil society organisations in this area remains fragmented and highly dependent on dedicated individuals. The lack of long-term, predictable funding for civil society organisations makes it difficult to build and retain the necessary expertise and collaborative partnerships. To ensure

²⁶ Ministry of Education and Research (2021).

²⁷ Ministry of Labour and Social Inclusion (2025).

that measures are accurate and comprehensive, the Government should establish more formalised collaborative structures and allocate earmarked funding to organisations with specialised expertise in the field.

Municipal economies and funding for shelters and other assistive services

Never before have so many people taken advantage of the services provided by crisis shelters in Norway as in 2024.²⁸ At the same time, Norwegian civil society reports that crisis shelter services are underfunded and underprioritised. In 2023, Menon Economics published a report, “Societal cost of domestic violence” on behalf of the Ministry of Justice and Public Security.²⁹ In this report, it is estimated that the societal costs of domestic violence totalled NOK 92.7 billion in 2021.³⁰ In comparison, only approx. 0.5 percent of this amount is used to fund crisis shelters.³¹

The municipalities are responsible for financing the operation of crisis shelters. The economies of Norwegian municipalities vary, but they are consistently strained.³² Many shelters report that insufficient funding has negative consequences for their operations. One of the shelters, for example, reports that underfunding has led to multiple discrepancies, such as understaffing, a lack of accommodation for men, and buildings that are not suited for shelter operations. This has consistently been reported, for years, to the municipalities the shelter serves, but the situation has not improved to any significant degree. At the same time, this shelter now reports that it will be able to upgrade its building due to a grant from Bufdir.³³ These centralised measures afford crisis shelters the opportunity to upgrade their services despite strained municipal economies, and this could help counterbalance regional differences.

Strained municipal economies have also led to the closing of many crisis shelters, as well as to contracts with local assistive services through Alternative to Violence and Nok. centres being renegotiated or terminated. Poor municipal economies lead many municipalities to purchasing shelter services from other crisis shelters, which increases commutes for victims who need their services. Financial considerations will often be a determining factor when municipalities decide which shelter to partner with, and the closest shelter is not necessarily the cheapest. This is a clear

²⁸ Norwegian Directorate for Children, Youth and Family Affairs (Bufdir) (2025a).

²⁹ Menon (2023).

³⁰ Menon 2023) p. 6.

³¹ Menon (2023) p. 54.

³² KS (2025).

³³ Bufdir (2025b).

trend in areas with low population densities and long distances, such as in Northern Norway and in Sami areas. Vague statutory requirements for the specific structure of shelter services, in combination with variable economic prioritisations, mean that shelter services are at risk of cuts to operation and staffing. This, in turn, leads to considerable regional differences in the ability of shelters to help victims of violence who need protection.

Crisis shelter services for at-risk groups

When assistive services are underfunded or cut, various at-risk groups, such as women with disabilities, minority women, women in active addiction, LGBTQI individuals or elderly women, are often hit the hardest. This is because services for these groups often need specialised solutions, such as universal design, sheltered units, or specialised expertise among staff.³⁴ Amendments to the Crisis Shelter Act would require municipalities to provide alternative shelter services when the ordinary service cannot be customised to meet individual needs. Even so, Norwegian civil society points out that an amendment in itself cannot ensure that the needs of at-risk groups are met without earmarked funding.

Shelter services for men must be strengthened. When shelter funding is tight, a simple solution is to introduce shared accommodation services for women and men. Under the current Crisis Shelter Act, accommodation services for women and men must be kept physically separate.³⁵ In 2024, they considered amending the act to allow municipalities to introduce shared accommodations for women and men, based on experiences from one shelter that had completed a pilot project.³⁶ A wide range of civil society organisations, as well as the Equality and Anti-Discrimination Ombud, were critical of this proposal.³⁷ Many shelters also wanted to maintain the requirement of separate accommodations, considering, among other things, a concern that shared accommodation could raise the threshold for women, who make up 90 percent of shelter residents, to seek help.³⁸ The proposal was shelved, pending further evaluation, but Parliament has allowed that municipalities, upon application, can carry out pilot projects with integrated crisis shelters/shared accommodations for men and women as part of knowledge development.³⁹

³⁴ For a more detailed description of the special needs of these groups, see the Norwegian civil society shadow report (2025) on the "Reporting form on the implementation of the recommendations addressed to state parties" on Article 4.

³⁵ Section 2 (5) of the Crisis Shelter Act.

³⁶ Prop 122 L (2024-2025) p. 20–21.

³⁷ LDO (2024), JURK (2024), MiRa Centre (2024).

³⁸ Secretariat for the Shelter Movement (2024), Gjøvik Crisis Shelter IKS (2024), Crisis Shelter for Tromsø and the surrounding region (2024).

³⁹ Innst. 439 L (2024– 2025).

Norwegian civil society expresses concern for the future of this statutory requirement and would like to emphasise that other measures exist that are more accurate and less triggering than shared accommodation, such as true service upgrades with more staff and better/more flexible buildings with the option of increased sheltering.

Recommendations:

- The Government must provide earmarked funding for the implementation of escalation plans, as well as the implementation of new legislation on violence.
- Allocations/grants to civil society organisations and relevant public sector stakeholders must be adjusted in accordance with the recent increase in the number of women who experience domestic violence, to ensure that services are maintained and developed.
- The Government must take a more proactive approach to funding for civil society initiatives and introduce three-year, earmarked operative funding for organisations working to prevent and reduce violence.
- Greater responsibility for funding must be taken at the national level for crisis shelters and other key services for victims of violence and abuse, to ensure these services are less vulnerable to deprioritisation and cuts due to strained municipal economies.
- Crisis shelters must be ensured sufficient funding for staffing, building upgrades and universal design, to ensure that their services meet the needs of at-risk groups.
- The police should receive earmarked funding to prevent domestic violence and sexual crimes.

Article 11: Data collection and research

Norway keeps a wide range of statistics on violence against women. Statistics Norway (SSB) annually publishes figures on reported criminal offences and their victims, which can be sorted by type of offence, gender and age. These statistics are based on the police database of criminal offences. The Directorate for Children, Youth and Family Affairs (Bufdir) annually collects statistics from all Norwegian crisis shelters. They keep and publish statistics on who use these services, the

relationship between users and violent offenders, and how accessible the service is for at-risk groups.⁴⁰ In addition, the Norwegian Centre for Violence and Traumatic Stress Studies (NKVTS) carry out national prevalence surveys on violence and abuse⁴¹, which supplement these statistics by mapping out incidents that are not necessarily reported to the police.

GREVIO's previous Baseline Evaluation Report (2022) established that Norway had a number of good initiatives, but that data collection generally did not meet the requirements established by Article 11 of the Istanbul Convention.⁴² The report especially highlighted that a lot of the statistics published in Norway lacks information about age and gender, that it rarely includes information about the relationship between the victim and the offender, and that the opportunity to follow a case from initial complaint to a final court ruling is limited. Data collection was described as fragmented and lacking coordination between various actors, such as the police, prosecuting authority, courts and the health sector. Norwegian civil society finds that the situation largely remains unchanged in 2025.

Experiences from Norwegian civil society

Civil society organisations assist women who experience various forms of violence, including physical, sexual, financial and digital. The violence often takes place at the intersection of criminal, family, immigration, and welfare law. Civil society finds that current data collection practices do not sufficiently reflect this diversity, which means that neither public authorities nor assistive services have an accurate image of the situation. There are still considerable differences in how different sectors and services register violent incidents, which makes it difficult to get a comprehensive and reliable overview of the situation. Multiple civil society organisations highlight NKVTS's surveys as important and valuable when it comes to establishing an overview of violence in Norway, but point out that these also fall short in certain areas, such as honour-based violence and forced marriage.

Norwegian civil society finds that some forms of violence are insufficiently documented or entirely absent from official statistics in Norway, such as psychological, financial and digital violence, as well as stalking. Rapid technological developments have led to an increase in types of violence perpetrated through digital channels with the help of technological tools, but the phenomenon has not been sufficiently defined or explored.

⁴⁰ Bufdir (2025c).

⁴¹ NKVTS (2023).

⁴² GREVIO (2022) p. 21–22.

Norwegian civil society also finds there is a lack of statistics on especially vulnerable groups and more complex cases. As an example, current statistics do not sufficiently reflect violence against minority women and violence and abuse among the immigrant population. There is also limited data on violent offenders with and without immigrant backgrounds, as well as on the number of people who are granted residence in Norway on an independent basis after experiencing intimate partner violence.⁴³ In order to develop more targeted measures, we also need more knowledge on how domestic violence is related to living conditions, poverty and employment.

On subsumption of intimate partner violence

Multiple civil society organisation report that cases involving domestic violence or intimate partner violence is “subsumed” (categorised) in police statistics for lesser offences, such as harassing conduct or assault. This makes it difficult to get an accurate overview of the true prevalence of intimate partner violence. That is why we call for a dedicated statistics on complaints against romantic partners, including non-spouses. We also need better statistics on cases that have been dropped and why they have been dropped. Read more about subsumption in the chapter on Articles 49 and 50.

Recommendations:

- Standardise and improve data collection across agencies with fixed variables: type of violence, gender and age, relationship between the parties and location of incident.
- Ensure that the police categorise cases involving domestic violence correctly and publish statistics on dropped cases, including the reason why a case was dropped.
- Expand categories and metrics for digital violence, financial violence and stalking, to ensure these are visible in the statistics.
- Make it possible to follow a case from complaint to conviction, including data on exclusion orders, protection orders, violations and sanctions, as well as any limitations of parental responsibility.

⁴³ Section 53 of the Immigration Act.

Articles 12 and 14: General obligations, prevention and education

Gender equality is an express political goal across all Norwegian sectors. The principle of gender equality has been formalised in legislation, education plans and national strategies, and is considered a fundamental element in the effort to prevent violence and discrimination. Civil society, however, find there is a persistent lack of coordination in the education and prevention effort, as well as a consistent weakening of gender perspectives. Terms like “violence against women” are replaced by “domestic violence”, and the language used in official channels is consistently gender-neutral.

Legislation and measures

Gender equality is mentioned in many contexts, including in connection with the statutory objectives of the Education Act⁴⁴ and the Kindergarten Act⁴⁵. The national curriculum (the official framework for the content of Norwegian compulsory education) emphasises that schools must build knowledge and promote beliefs that ensure equal worth and gender equality.⁴⁶ School health services shall also, according to guidelines issued by the Norwegian Directorate of Health, contribute to education on identity, relationships, boundaries, sexuality and violence. It has been expressly stated that education shall focus on intersectionality and contribute to the prevention of abuse.⁴⁷

There are a wide range of education programmes that can be used to promote gender equality and prevent gender-based violence, developed by the public sector and civil society organisations, including *Uke 6* from Sex og Politikk, *JegVet.no* and *Snakkemedbarn.no*. The Centre for Equality has developed several specific competence-building measures for kindergartens and schools, including *Våg å se, våg å handle* (Dare to see, dare to act), which is a course for staff in kindergartens, after-school recreational programmes (SFO) and primary schools, and *Hvor går grensen* (Where is the limit), which is a workshop on sex, consent and boundaries for teens. Save the Children have educational brochures and other materials on domestic violence, whereas Alternative to Violence and Reform (a resource centre for men) have developed an education programme on partner violence and

⁴⁴ Section 1-3 (4) of the Education Act.

⁴⁵ Section 1 (3) of the Kindergarten Act.

⁴⁶ Udir (2017) section 1.1.

⁴⁷ Norwegian Directorate of Health (2019).

boundaries aimed at teens.

Norway has a generalised duty to avert crime, which means we all have a duty to actively try to prevent violence and abuse.⁴⁸ Civil society nevertheless finds that awareness among the general population about this duty is low. To ensure compliance with this duty, civil society organisations are requesting greater efforts in raising awareness, e.g. through public awareness campaigns. This could make the public more aware of what this duty entails, what triggers it and what people specifically can do to prevent abuse and violence.

Coordination

Despite a solid formal framework and a number of good initiatives, civil society finds that the current education and prevention efforts are highly unsystematic and marked by haphazard practices. Civil society organisations report poor collaboration between various instances, such as police, schools, health services, child welfare services and volunteer organisations, as well as considerable regional differences. Collaboration is often described as highly dependent on dedicated individuals. There is also a lack of systematic training for relevant occupational groups. Read more about this in the section on Article 15.

Funding

A significant share of awareness and prevention work is currently being performed by civil society organisations. These need reliable and predictable funding in order to maintain a future-oriented and methodical approach to these activities. Civil society consistently finds that the current funding schemes are neither long-term, stable, nor predictable, which makes it difficult to take a systematic approach to this work, while simultaneously increasing the administrative burden. Read more about this in the section on Article 8.

Civil society also finds that not enough funding is allocated to sexual education programmes. This is necessary in order to implement the Government's own strategy on sexual health. The Rape Committee presented its report in 2024. The experts in the committee highlight the need for more sexual education,⁴⁹ The committee especially emphasised the need for clear and binding guidelines, where learning objectives related to sexuality, boundaries and sexual violence should be defined and formalised to prevent regional variations in quality.

⁴⁸ Section 196 of the Penal Code.

⁴⁹ NOU 2024: 4 pp. 14, 91–93.

Information about rights to women with minority backgrounds

Women with immigrant backgrounds are especially vulnerable to violence, as they often have a much harder time navigating the system to get help. This could be due to language barriers, short residency in Norway, limited social networks, or low trust in or knowledge of public health and care services. Despite the existence of multiple information initiatives aimed at victims of violence, civil society organisations that are in contact with this group of victims report that this information is not always accessible by women with immigrant backgrounds who are victims of violence. This is especially true for the group of women with short residency in Norway. A lack of knowledge about their rights and available assistive measures means that many do not report the violence. As an example, many do not know that they can speak to their primary care physician or the health clinic about violence.

Multiple civil society organisations especially emphasise that the needs of women who have come to Norway on the basis of family immigration have been highly under-communicated, despite these women being at especially high risk of violence and isolation. Persons who come to Norway on the basis of family immigration have the right to Norwegian language training and education on Norwegian society, but this programme is less comprehensive than the introduction programme offered to refugees and certain other groups. This means many who come here through family immigration are not provided with sufficient information on their rights and assistive services in Norway, which puts them at higher risk of remaining in violent relationships. Civil society requests that this group be provided with more information about their rights, as well as about legislation and assistive services, especially their right to residence on an independent basis⁵⁰ if they experience violence in their own home.

Preventive awareness efforts

As for preventive awareness efforts aimed at reducing violence against women, many point to the gradual erosion of recognition that violence is a gender-specific problem. When men's violence against women is described as "domestic violence", the gender perspective fades to the background, and both the description of the problem and the prevention effort become less accurate. Many civil society organisations highlight the importance of retaining gender discrimination against women and girls as a separate basis of discrimination in the Equality and Anti-

⁵⁰ Section 53 of the Immigration Act.

Discrimination Act, thus preventing the erasure of specific problems that primarily affect women. At the same time, civil society firmly believes that violence prevention also should include victims of violence who do not fall under the typical constellation with a man as the offender and a woman as the victim.

Many emphasise the importance of awareness efforts being aimed at boys and men, and the importance of catching them early. Some highlight the importance of using inclusive language, making it clear that boys and men are part of the solution and that we stand united in the fight against violence. We need to start early, raising awareness of one's own boundaries and the boundaries of others. Prevention programmes aimed at men and boys should include emotional regulation, the processing of underlying trauma, and conflict resolution and communication skills. Some also point to the value of elevating men who have personal experience with violence as agents of change, and of boys being presented with good, safe male role models.

Recommendations:

- The Government must ensure better coordination of and support for education and prevention efforts against violence and gender discrimination across different sectors, like the police, school, health care and volunteer sectors.
- Avoid gender-neutral language and gender-neutral measures in efforts to combat violence against women.
- Ensure stable and sufficient funding for organisation and services with expertise in the field, to enable these to perform systematic preventive and awareness-raising work.
- Strengthen compulsory, age-appropriate sex education with a focus on consent, boundaries and sexual violence.
- Develop and disseminate targeted information about fundamental rights, assistive measures and residence permits on an independent basis in multiple languages to women with minority backgrounds.
- One should focus on early awareness efforts aimed specifically at boys and men, promoting boundaries, empathy, conflict resolution and positive male role models.
- Raise awareness of the duty to prevent violence through national awareness campaigns explaining what this duty entails and how to comply with it.

Article 15: Training of professionals

Training in professional education programmes

Multiple civil service organisations report that we currently do not provide systematic training for occupational groups who interact with victims of violence on the different types of violence against women and domestic violence. It is especially important to note that we do not provide sufficient training on violence in close relationships in the ordinary education programmes in the health and education sectors, even if these occupational groups are directly impacted by the duty to prevent and often come into contact with victims of violence. In the educational sector, this situation is further substantiated by Save the Children's report *Teaching student perspectives on sex education* (2023), where teaching students report that they would like to have more practical training in teaching pupils about gender, relationships and setting boundaries. The students report that they would like to know more about how these topics can be addressed in the classroom.⁵¹

A recent example of the deprioritisation of training on violence is the proposal made by Norwegian authorities to lift the requirement that nurses must learn how to talk to children about violence and abuse as part of their nursing education.⁵² The proposal was met with strong criticism from professional bodies and civil society organisations that work with violence. Among other things, they point out that this proposal entails a significant erosion of children's legal safeguards and protection from violence and abuse.⁵³ In addition, knowledge of negative social control and honour-based violence has been removed from the education programmes for social workers and child welfare officers.

Competence-building for professionals who come into contact with victims of violence

More knowledge about violence is needed in assistive services and other public services, such as schools and healthcare institutions. One key measure often highlighted in this context is a more systematic involvement of civil society organisations that offer competence-building related to violence.

Civil society organisations mention several good educational programmes, including *TryggEst*. This is a model, organised by Bufdir, that helps municipalities

⁵¹ Redd Barna (2023) pp. 8–10.

⁵² Norwegian Directorate for Higher Education and Skills (2025).

⁵³ NKVTS (2025).

protect at-risk adults through prevention, detection and management of violence and abuse. Municipalities with TryggEst teams can apply for grants to learn more about violence.⁵⁴ Several crisis shelters use TryggEst as a framework for training other services. One challenge is that shelters rarely have the resources to engage in activities beyond their core activities at the shelter.

Others mention the Centre for Equality's "VIP – Very Interesting Person" project. This is a violence-prevention programme that help individuals with intellectual disabilities to better understand emotions, set boundaries and recognise violence.⁵⁵ The centre trains municipal representatives as instructors, who, in turn, carry out the programme locally. In partnership with FRI, the Centre for Equality is also developing training courses for crisis shelter and Nok. centre staff on LGBTQI victims of violence. Another example is *Taushet tar liv* (Silence kills), which is a collaboration between the Equality and Anti-Discrimination Ombud and the Secretariat for the Shelter Movement (through the VO helpline), which provides training, among other things, to first-line service workers and municipal management about domestic violence and intimate partner homicide.⁵⁶

On the duty to avert

A 2020 survey addressed the understanding among professionals of the differences between the duty to inform and report, the duty to avert and the duty of confidentiality. It showed that one in three professionals in the health, education and youth work sector was not familiar with the duty to avert, despite this duty being relevant for domestic violence situations.⁵⁷ Norwegian civil society believes that the lack of knowledge of the duty to avert is a key obstacle to detecting or handling violence in time. The escalation plan does not include any specific measures to address this issued.⁵⁸

Recommendations:

- Domestic violence and the consequences of this violence must be included in the basic education for all relevant occupational groups, including health and social services, psychology and education.
- Knowledge about gender and sexual diversity must be included in the

⁵⁴ Bufdir (undated).

⁵⁵ Centre for Equality (undated).

⁵⁶ Secretariat for the Shelter Movement, VO helpline and LDO (undated).

⁵⁷ NKVTS (2020).

⁵⁸ Prop. 36 S (2023–2024).

education for all relevant occupational groups.

- Knowledge about negative social control and honour-based violence must be included as a mandatory course for social workers, child welfare officers, kindergarten staff and teachers.
- Professionals in all relevant services must receive sufficient training on domestic violence as a phenomenon, on risk assessment and the duty to avert, and on collaboration and coordination between relevant services.

Article 16: Preventive intervention and treatment programmes

Norwegian civil society consistently point out that not enough preventive effort is being aimed at potential or existing violent offenders.

First, many emphasise the fact that general cuts to low-threshold services for disadvantaged and at-risk groups increases the risk of poor health and violence. These perspectives are often overlooked in the public discourse on marginalisation and youth crime.

Civil society also describe a need for a stronger focus on intervention aimed at potential violent offenders and adults who are violent with their partners (primarily men), by strengthening violence-preventing treatment programmes, such as those provided by Alternative to Violence (ATV).⁵⁹ Many point to the considerable regional differences in the availability of this programme, and that strained municipal economies put this type of programme at risk of cuts.⁶⁰ Furthermore, ATV alone does not have the capacity to identify and meet the need for treatment programmes for domestic abusers. In some areas, the municipal family counselling office is the only service working preventatively with violent offenders, but they have limited capacity and knowledge on this topic.

Treatment programmes for violent offenders in prison must also be strengthened. Those who have been convicted of sexual offences, who are serving out a sentence for such offences and who are deemed to have an elevated risk of committing new sexual offences, have the opportunity to participate in the voluntary treatment programme BASIS. This treatment is coordinated with the specialist health

⁵⁹ ATV also works with adults and children who are victims of violence.

⁶⁰ See chapter on Article 8 on funding for more information.

services.⁶¹

Recommendations:

- Strengthen preventative initiatives aimed at potential violent offenders and adults who are violent with their partners, among other things by securing stable and earmarked funding to Alternative to Violence (ATV), so that their violence-preventing treatment programmes can be maintained and made available nationwide.
- Work to reduce regional differences in access to treatment options for persons who are violent with their partners.
- The municipalities must be provided with a better economic framework to offer and maintain low-threshold services to disadvantaged and at-risk groups, as part of their broader violence-prevention effort.
- Strengthen the competence on domestic violence in family counselling offices, so that they can contribute more effectively in the prevention effort.
- Treatment programmes for violent and sexual offenders in prison, such as the BASIS programme, must be strengthened and made more accessible.

Articles 18 and 20: General obligations and general support services

The Government's escalation plan against violence and abuse recognises the pressing need for a more uniform and coordinated effort to combat domestic violence, in accordance with the principles of the Istanbul Convention. Coordination and collaboration are defined as one of the plan's five main focus areas, and the work to establish the necessary structures has begun. Among other things, this entails measures aimed at strengthening inter-ministerial collaboration and the establishment of a directorate group that will be working to improve cross-sectoral collaboration and coordination of public means. An evaluation process has also been initiated, to establish an interdisciplinary model for risk assessment and risk management. The Children's House model is an example of a similar model for children, but there are still no equivalent coordinated solutions for adult victims of violence who are not part of the target group for TryggEst.

The Auditor General's survey of government initiatives against domestic violence from 2022 revealed a number of shortcomings in the overall assistance measures

⁶¹ SIFER (undated).

for victims of violence. Main findings included inefficient collaboration between various authorities (police, health services, municipal services) and considerable regional differences in municipal support of victims of violence. The conclusion was that the government effort against domestic violence overall does not meet the needs women who are victims of violence have for comprehensive and coordinated protection and assistance.⁶²

The report, *Crisis shelters as arenas for support, follow-up and awareness-raising*, points out that municipal obligations in terms of shelter services are poorly defined, and that expectations for coordination and uniformity are not always met in practice.⁶³ Findings from the report support that municipal compliance with the Crisis Shelter Act varies, and that compliance with the statutory requirements is not always achieved in practice. This is partly why assistive services seem fragmented and unpredictable.

Lack of coordination between assistive services

Norwegian civil society also finds that collaboration between key services, such as the police, school, health service, child welfare service and volunteer organisations is arbitrary, dependent on individuals and subject to regional variations. This makes the system feel fragmented and complex to victims of violence. Civil society organisations describe the need for a uniform support model with established pathways, or with a fixed contact person who can follow the victim of violence through the entire process, from the acute phase to re-establishment.

The consequence of a poorly coordinated system is that victims of violence themselves are left to navigate a fragmented system, and many victims of violence find that they have to tell their story again and again to different people. The public assistive system currently has no mechanism for coordinating services provided to the victim, which means a lot of this responsibility reverts to volunteer organisations or arbitrary individuals with knowledge of the system. Organisations like the Red Cross or the Norwegian Women's Public Health Association often find that volunteers are forced to shoulder the responsibility of coordinating and making sure the women they are helping get access to public services in order to find housing, financial assistance and other practical assistance after having broken out of a violent situation.

This lack of coordination is especially problematic in situations where women who

⁶² Office of the Auditor General (2022).

⁶³ NKVTS (2024) p. 120.

are victims of violence also have children. The violence often continues in a different form after leaving the relationship, especially indirectly through a joint child (continued violence), or by the system treating the violence as a conflict in parental disputes.⁶⁴ The burden of rebuilding their life on their own after a violent situation means that many victims of violence go back to the offender.⁶⁵

The option to implement individual plans (IP) is provided in the Crisis Shelter Act, but civil society points out that this scheme is not utilised to any significant degree. Many municipalities view IP primarily as a tool for individuals who need health services related to somatic disorders. At the same time, victims of violence often have complex needs that require coordination of multiple different services, both municipal and in the specialist health services. A broader use of IPs could, in many cases, help ensure better coordination of support services.

Procedures for safety and medical needs

Civil society organisations explain that established procedures do exist for documentation and medical support in connection with sexual abuse and domestic violence, both in terms of treatment and in terms of health service coordination in sexual assault referral centres.

The Norwegian Directorate of Health has developed a guide for health and care services to use in situations involving domestic abuse. This guide includes recommendations for how to handle negative social control, forced marriage and genital mutilation. In addition, NKVTS has developed an online guide for health personnel, with information about risk factors, indications of violence, communication with victims and protective measures. Civil society organisations do note, however, that while good procedures and guides do exist, awareness of them is often limited outside of the sexual assault referral centres, and knowledge of violence and related issues is generally too low in the health and care services sector.

Vulnerable women's access to health services

Norwegian civil society finds that women who have a higher risk of experiencing discrimination due to disability, minority background, sexual orientation, age or religion, face more barriers to their access to health services than other women. Many assistive organisations point to the need for an adviser or coordinator who

⁶⁴ For a more detailed description of violence in parental disputes, see the chapter on Article 31.

⁶⁵ Bufdir (2024).

can follow the person in their contact with various public services and act as a bridge into follow-up and support services. This need arises because health services often lack the capacity to follow individuals closely over time, and therefore do not fully understand the situation victims of violence find themselves in after the violence.

Language barriers are an additional barrier for true access to health services. The new Interpreting Act, which took effect in 2022, require public services to assess the need for a qualified interpreter when individuals who are not native speakers of Norwegian reach out.⁶⁶ While this Act strengthens the statutory right to an interpretation, it does not grant an individual right to an interpreter – as recommended by the UN Committee on the Elimination of Racial Discrimination (CERD). It is still the public service, and not the user, assessing the need for interpretation.

Many victims of violence avoid gynaecological examinations and dental work. There is an interdisciplinary dental health service for victims of abuse and torture, but the service is underfunded and has limited capacity.⁶⁷ The Government recently proposed to formalise the right to bring a support person to medical appointments, which is a key step forward. One must ensure that this right is widely known among both patients and health personnel. At the same time, the entire health service sector needs more competence on trauma-sensitive care.

Right of vulnerable women to freely consent to sterilisation and abortion

New legislation regulating abortion took effect on 01 July 2025. The new Act strengthens the right of co-determination for women under guardianship who have been deemed to not have the ability to consent. It is too soon to speak on the practical consequences of this.

The Sterilisation Act does not authorise forced sterilisation, but a guardian may apply for sterilisation on behalf of a person who does not have the ability to consent.⁶⁸ If the patient opposes the procedure, it can normally not be forced. Certain exemptions are provided by the Patients' Rights Act⁶⁹, which includes provisions on how health personnel can proceed if a person without the ability to consent opposes necessary health care. The access to proceed with medical intervention in such cases is highly limited and requires a special administrative

⁶⁶ Section 6 of the Interpreting Act.

⁶⁷ Norwegian Directorate of Health (undated).

⁶⁸ Section 4 of the Sterilisation Act.

⁶⁹ Chapter 4A of the Patients' Rights Act.

decision.

Civil society organisations are not aware of any general surveys that document the practical application of these regulations. However, in a supervisory report from September 2025, the County Governor of Innlandet. found that multiple women with an intellectual disability had had intrauterine devices inserted during anaesthesia. These procedures had been performed without any assessment of the women's ability to consent whatsoever, and no administrative decisions had been made. Several of the procedures had taken place while the patients were admitted for other procedures, such as dental work. In the County Governor's assessment, this was likely done to circumvent anticipated objections from the patient, which could constitute unauthorised use of force.⁷⁰ Civil society organisations also find that patients in some cases are put under anaesthesia to circumvent anticipated objections to the medical care, without any assessment of whether this constitutes a forced medical intervention, as required by law. Similar surveys have not been performed at other hospitals, but these findings and experiences lead civil society organisations to believe that this could be a prevalent practice.

Safety and protection needs of women who are victims of violence and live in an institution

There is reason to be concerned about whether women who live in institutions in Norway are protected from violence. Civil society organisations believe we need more knowledge about this, and that an evaluation is needed. In the past five years, County Governors have received at least 33 reports of sexual abuse perpetrated by employees against children in child welfare institutions. At least nine employees have been convicted of abusing children in child welfare institutions in the last seven years.⁷¹

For asylum reception centres there are a number of guidelines for the identification, follow-up and reporting of violence. In a report from 2021, reception centre employees claim to be relatively well aware of these, and they express that the guidelines are useful in their handling of violence and abuse cases.⁷² Some civil society organisations, however, report certain challenges, particularly in connection with relocations to another centre when necessary. One of the crisis shelters reported that the violent offender and the victim had to remain living at the same

⁷⁰ County Governor of Innlandet (2025) p. 8.

⁷¹ Flatabø (2025).

⁷² Møller (2021).

reception centre after the relationship ended.⁷³

A study of violence against the elderly in Norwegian nursing homes revealed that sexual abuse does occur in these institutions, and that care personnel need more knowledge about this topic in order to uncover and prevent this type of violence.⁷⁴

Recommendations:

- Establish a national model for cross-sectoral collaboration, with clearly defined roles and binding collaboration.
- Establish a comprehensive follow-up model based on established pathways for victims of violence, where one coordinator follows the victim throughout the entire process – from the acute phase to re-establishment. The pathway must include and ensure financial stability, practical assistance and access to necessary health services.
- Build competence on violence, trauma and negative social control throughout the health and care services sector, and ensure that existing procedures and guidelines are widely known and used.
- Ensure protection from violence and abuse in institutions, like nursing homes, child welfare institutions and asylum reception centres through better supervision, training and independent reporting mechanisms.
- Carry out prevalence surveys on abuse against women in institutions, assisted living facilities or women who otherwise need assistance or care in their home.
- Ensure that service providers who perform procedures involving sterilisation, abortion and long-term contraceptives are familiar with the relevant ethics regulations on autonomy and ensure that a valid consent has been given.

Articles 22 and 25: Specialist support services and support for victims of sexual violence

In Norway, there are a number of specialist support services for victims of gender-based violence, including sexual abuse. These services are provided both by the public sector and by civil society organisations, and include crisis shelters, health

⁷³ For a more detailed account of the situation in asylum reception centres, see the Norwegian civil society shadow report (2025) on the “Reporting form on the implementation of the recommendations addressed to state parties”, under “Recommendation A.16, IC-CP/INf (2022) 13#.

⁷⁴ Botngård (2020) pp. 5–10.

services, advisory services and helplines. The services face challenges related to funding, regional coverage and targeted assistance to at-risk groups.

Funding

The Norwegian Government provides funding to specialist support services in different ways. Some support services receive earmarked funding through the National Budget, some must apply for public funding through various grant schemes, and others are funded at the municipal level.

The proposal for the National Budget for 2026 indicates that the ministries generally want to see a reduction in earmarked funding in favour of organisations applying for funding through various grant schemes. This erodes predictability for civil society organisations. Examples of organisations that have lost their earmarked funding in the proposed National Budget include the MiRA Centre, which focuses on issues related to gender equality for minority women in Norway, and the Secretariat for the Shelter Movement, which is a membership organisation for Norwegian crisis shelters that also manages the VO helpline (a national helpline for victims of domestic violence and abuse), and ROSA, a national support service and competence centre on human trafficking. Read more on funding for various support services under Article 8.

Specialist support services for minority women

There are a number of organisations offering specialist support for women with minority backgrounds, such as the MiRA Centre, the Red Cross helpline for negative social control and honour-based violence, SEIF, the Competence Team and the Diversity Adviser scheme.

Despite many good measures, however, the services are fragmented and underfunded. The MiRA Centre⁷⁵, for example, does not have the capacity to support all the women who need their help for an extended period due to a lack of resources. This negatively affects less urgent cases. Many organisations point to the need for better coordination in order to support this group more effectively. Civil society organisations also highlight that religious organisations should build better competence on violence in order to know when they should refer a member to the public support services.

⁷⁵ The MiRA Centre is a resource centre with special expertise on the needs of minority girls and women who have experienced violence.

There are several services aimed at people who experience negative social control and honour-based violence, especially youths. Civil society organisations highlight the need for more services aimed at adult and elderly women with minority backgrounds, as well as increased competence in support services on immigration legislation and how racism and discrimination increases the risk of violence. Women who come to Norway through family immigration are often in an especially vulnerable situation, as a violent partner may take advantage of their lack of language proficiency and knowledge about the rights they have. This group needs better information and support, especially as concerns their right to residence on an independent basis if they experience abuse.

Specialist support services for victims of human trafficking

Victims of human trafficking have often experienced relationships that share a lot of the same characteristics as domestic abuse, especially those who have been exploited for prostitution. Even so, the current legislation does not explicitly state that victims of human trafficking have a right to safe accommodation at crisis shelters, even though the preparatory works to the Crisis Shelter Act describe their protection under the law.⁷⁶ This could give rise to legal ambiguity and differing practices between municipalities. It is therefore important that the legislation explicitly state that victims of human trafficking have the right to shelter accommodation.

Specialised support services for children and vulnerable adults

Crisis shelters

Around 1,500 children stay in Norwegian crisis shelters every year.⁷⁷ Norway has an obligation to ensure that all children, regardless of where they live, have the same opportunities for a safe and good childhood.

The new 2025 Crisis Shelter Act strengthens the child's perspective by clarifying that considerations of a child's best interests shall be prioritised. The Act also ensures better support for families with children, both during their stay at the shelter and after they move out. Civil society organisations are positive to these legislative amendments. At the same time, it is noted that Parliament, in its hearing of this Act, asked the Government to explore potential solutions for ensuring that all children in shelters have the right to free and safe transport to leisure activities, after-school programmes and kindergarten. Civil society points out that this proposal should be

⁷⁶ Ot.prp.no. 96 (2008–2009) p. 46.

⁷⁷ Bufdir (2025d).

implemented quickly, to ensure children have an opportunity to maintain some degree of normalcy while staying in a shelter.

Some organisations recommend implementing requirements for specialised childhood development expertise for shelter employees who work with children who have experienced violence. At the same time, a majority of organisations emphasise that the most important factor is ensuring sufficient staffing to maintain all necessary support functions.

Children's houses

The children's houses work to ensure that children who experience violence and sexual abuse receive high-quality and comprehensive support and treatment services in a single location. That is why the children's houses have facilities for interviews with the police, medical examinations, conversations and therapy. The children's houses have implemented new methods for interviews and medical examinations that are less invasive for the children. An interdisciplinary and diverse staff ensure that the child does not have to repeat their story multiple times to different authorities.⁷⁸

In addition to providing services for children, the children's houses also handle judicial interviews with adults with intellectual disabilities or other intellectual impairments. A recent evaluation of the service shows that the children's houses also provide a key service for vulnerable adults who have experienced or witnessed violence and abuse, provided the police and prosecuting authority are able to identify them. The report's recommendations include a clearer distinction between services for children and services for adults, stronger competence and collaboration around especially vulnerable adults, and to change the name to something else than 'children's house' to reflect that they also offer services to adults.⁷⁹

Civil society organisations consistently point to the children's houses as a good service, and one that should be used as a model for coordination of other specialist support services aimed at other groups of victims of violence and abuse.

Support services for victims of sexual violence

Both the public sector and civil society organisations currently provide support

⁷⁸ Norwegian Police (undated).

⁷⁹ Kermit (2025) p. 124.

services to victims of sexual violence. The public sector has sexual assault referral centres in urgent care clinics or hospitals, and these centres are part of the public health service. All municipalities are obligated to offer shelter services, where victims of domestic violence, including sexual violence victims, can get help.⁸⁰

Victims of sexual assault and their families can get help at Nok. centres, which are a nationwide support service operating on the principle of guided self-help. The service is free and supplemental to the public health services. Nok. centres are funded by joint grants from public sources at the state, county and municipal level. State-level funding makes up a majority of the funding, but co-funding from municipalities are a condition to ensure local support. In 2024, Nok. centres had contracts with approx. 200 municipalities.⁸¹

In Oslo, there is also the Dixi Resource Centre, which is a free, low-threshold service that also operates on the principle of guided self-help.⁸²

Norway is a country with long distances and varying population densities. In parts of the country, especially in Northern Norway, the closest sexual assault referral centre, Nok. centre or crisis shelter can be far away when someone has experienced violence or sexual assault. Civil society organisations point out that many of the same issues that apply to crisis shelters in terms of funding and geographical accessibility, also apply to support services for victims of sexual violence.

Recommendations:

- Ensure predictable and long-term funding of specialist support services in order to maintain stable operations and expertise.
- Amend legislation to clarify that victims of human trafficking have the right to shelter accommodation to ensure equal treatment and legal protection across all municipalities.
- Strengthen and coordinate services for minority women, including better information about rights in connection with family immigration, and build competence in support services on racism, discrimination and immigration legislation.
- Require childhood development expertise and sufficient staffing in crisis

⁸⁰ Section 2 of the Crisis Shelter Act and Ot.prp.nr. 96 (2008–2009) p. 38.

⁸¹ Nok. Norge (undated).

⁸² Dixi Resource Centre (undated).

shelters. Implement proposal for free and safe transport for children in crisis shelters.

- Build on the children's house model to develop coordinated support services for adult victims of violence and abuse.
- Strengthen geographical accessibility and funding of support services for victims of sexual violence, including Nok. centres and sexual assault referral centres, especially in rural districts.

Article 31: Custody, visitation rights and safety

In connection with separation and parental disputes, all parents with joint children under 16 years old must attend conciliation meetings with the family counselling office. The purpose is to help parents establish a parental cooperation agreement. If the parents cannot agree on an arrangement, they can bring the matter before the court.⁸³ Both in extrajudicial conciliation and in court, the goal is for parents to come to an agreement or settlement on how to cooperate for their joint child. This model was implemented in 2004 and entails that the courts are involved, to a much higher degree than in other types of civil cases, to mediate between the parties with the goal of establishing a settlement.⁸⁴

The preparatory works state that cases involving violence or other causes for concern shall not be handled using this model.⁸⁵ Reports from civil society organisations and research communities show, however, that this still occurs in practice. Civil society organisations also point out that recently adopted amendments to the Children Act could potentially reinforce this trend.

Conciliation and court proceedings

Several civil society organisations report that violence against mothers and children is generally not emphasised in parental disputes. Often, considerations of best possible "parental contact overall" or the "biological principle" will be determining factors in these cases, even in cases where it has been documented that the father has been violent with the mother and the child.

Civil society organisations, including crisis shelters, point out that a history of violence in conciliation and court proceedings is often described using phrases like

⁸³ Section 36 of the Children Act.

⁸⁴ Section 61 of the Children Act.

⁸⁵ Ot.prp. nr. 103 (2004–2005) p. 56.

“alleged violence”, “parental conflict”, or “dysfunctional interaction”. This type of linguistic framing of the parental dispute contributes to an obfuscation of the violence and the asymmetrical relationship between the parents, and it leads to mothers being forced to accept agreements on contact and parental responsibility in conciliation.⁸⁶

Research also shows considerable variation in expert witness reports in terms of how much attention is paid to the violence in the report and the relevance assigned to the violence in the report.⁸⁷ Expert witnesses often refrain from assessing whether the mother and child are traumatised, or they dismiss how the violence has affected the victims.⁸⁸ In several of these cases, the violence against the mother is seen as separate from violence against the child, which does not align with the updated professional understanding of violence. Even in cases where the father has been reported or convicted of violence against the mother, this violence is not often seen in context of the child’s care environment.⁸⁹

The consequence of this lack of focus on violence in expert witness reports is that the violence has no impact on the father’s exercise of parental rights vis-à-vis the child. This means considerations of the child having a relationship with their father trumps considerations of safety and security for the mother and the child in these cases.

Continued violence and systemic violence

A wide range of organisations also describe how the same tendencies often result in the violence continuing in the same or new forms after the separation of the parties. This includes direct violence, in the form of physical, psychological or sexual violence in connection with pick-ups and drop-offs for contact, or by the child’s father continuing to contact the mother after their separation to threaten her. Violence can also occur as financial control, in the form of refusing to pay child support, repeatedly violating contact agreements or by manipulating the child.

Women who are victims of violence and have children are faced with conflicting expectations from different parts of the system. For example, child welfare services may require that mothers who have left an abusive husband protect their children by suspending contact with the children’s father, while they, in a parallel parental

⁸⁶ Bredal (2025) p. 68.

⁸⁷ Torvik (2024).

⁸⁸ Torvik (2024).

⁸⁹ Torvik (2024).

dispute, are required to show a willingness to cooperate with the same man.⁹⁰ Many organisations point to how public schemes and systems can contribute to continued violence and control, e.g. when a violent father repeatedly initiates a child welfare investigation, or paints a picture of the mother as mentally ill to support services, kindergartens or schools.⁹¹ As a result, women are met with suspicion by the services they need help from, and their reactions to and fear of the violent offender is interpreted as evidence that they are psychologically unstable and unfit caregivers. Civil society organisations describe how women in these types of cases are often accused of “contact sabotage” in connection with the parental dispute. Many women also describe that others don’t believe them, or a fear that they will be seen as confrontational, which makes them keep quiet about the violence they experience.

Increased vulnerability of minority women

Civil society organisations point out that minority women are especially vulnerable to systemic violence in parental disputes. Manipulative partners can exploit language and cultural barriers to appear credible with child welfare services, schools and kindergartens, health services and courts. Many women describe situations where they are not believed when they report violence, and that language barriers and limited social networks increase their risk of being perceived as confrontational. This makes it difficult to break out of a violent situation and go through with a legal process. For many minority women, their limited access to free legal aid is an additional barrier in these types of cases.

The new Children Act

In the spring of 2025, Parliament adopted a new Children Act, despite strong objections from a majority of experts, including violence researchers, the Ombudsperson for Children, district court judges, the Norwegian Courts Administration and crisis shelters.⁹² The Standing Committee on Family and Cultural Affairs also received a joint appeal against the Act before voting, signed by many of the most prominent organisations, researchers and stakeholders in the field of violence.⁹³ The Act will take effect in 2027. Multiple civil society organisations have expressed strong concerns that the extensive research on domestic violence and violence against children had not been taken into account in

⁹⁰ Bredal (2025) and Bredal (2022).

⁹¹ Bjørnholt (2024).

⁹² Andenæs (2025), OsloMet (2025), Ombudsperson for Children (2025), Oslo District Court (2025), Stine Sofies stiftelse (2025a), Secretariat for the Shelter Movement (2025) et al.

⁹³ Stine Sofies Stiftelse (2025b).

the design and adoption of the new Act.

The main principle has not changed; in case of separation, parents can agree on the solution they want for their parental cooperation. The new Act establishes, however, that the new main principle shall be *joint daily authority* for both parents after separation if the parents cannot agree. This is different from the current solution, where the right to make major decisions about the child's daily life rests with the custodial parent, who, in practice, has primary custody of the child.

An arrangement with joint authority requires that the parents are able to agree on various questions to do with the child's daily life. This includes decisions related to the child's education, kindergarten and leisure activities, as well as where the child should live. In the consultation round, a majority of experts pointed out that forced cooperation on such decisions would facilitate for extensive continued and systemic violence, and many were disappointed that intimate partner violence was not included as a separate phenomenon in the legislative proposal.

In addition, the new Act requires consent from both parents for relocations within the country. Under this new Act, a violent parent has the authority to deny a mother and child who have experienced violence the right to move away, if this main principle of joint authority is applied.

A majority of civil society organisations and experts in the field pointed out that parents who have a relationship characterised by cooperation and equality already have the option to agree on divided residence due to the Act's provisions on *contractual freedom*. It is only in cases where the parents cannot agree due to violence, control or risk of neglect that the provisions of the Children Act will apply. The new Act and joint daily authority will entail, however, that considerations of "equal parenting" take precedence over women and children's protection from violence.

Taking into consideration that research already shows that the support system fails to identify and handle cases where violence is clearly a factor, this new Act will entail further erosion of the legal protection of women and children who are victims of violence.

Recommendations:

- The new Children Act should be evaluated as soon as possible in light of the

Government's obligation to protect women and children from violence. The arrangement with joint daily authority and consent being required to relocate within the country must be reversed. In this evaluation, decisive importance must be attached to input from prominent experts on violence and abuse.

- Violence must be a determining factor in cases concerning residence and contact. The courts, child welfare services and family counselling offices must increase their competence on violent dynamics and trauma reactions, so that support services are better able to identify cases where there is a history of violence.
- Psychological violence must be recognised more often, and it should be possible to argue psychological violence in parental disputes.
- Violent parents should not be allowed to have contact with children who live in crisis shelters, unless the contact is supervised.
- Contact practices should be reevaluated to protect children and parents who have experienced violence from continued violence. If intimate partner violence has been documented, the main rule should be supervised contact.
- Clear procedures should be developed to make it possible for specialist support services to assume responsibility for arranging and executing supervised contact, in order to protect the parent who is a victim of violence.

Article 48: Prohibition of mandatory alternative dispute resolution processes or sentencing

Mandatory conciliation in parental disputes

Extrajudicial conciliation is mandatory in parental disputes where the parents have a joint child or joint children under 16 years old. While the intention is that cases involving violence should not be subject to conciliation, reports from user organisations and research both show that parental disputes with a history of violence consistently are included and handled as parental dispute cases instead of cases involving violence. The way conciliation is currently set up, it requires women who are victims of violence to attend mandatory conciliation meetings with their violent partner in parental disputes. For a more detailed description of this issue, see input to Article 31 above.

Voluntary mediation in the Mediation Service

Cases involving domestic violence can also be handled through mediation in the Mediation Service. The Mediation Service is a state-run service that offers

mediation as a method to address criminal offences or conflicts.⁹⁴ A case can either be forwarded to the Mediation Service by the police/prosecuting authority in lieu of prosecution of a criminal case, or it can be brought as a civil suit. In both cases, it requires consent from both parties to the mediation, which means that the arrangement is not mandatory for victims of violence.

The Mediation Service has special procedures and guidelines for mediation in cases involving domestic violence.⁹⁵ The Mediation Service's guide/manual for mediators in mediation of disputes where domestic violence is a factor is well-founded and includes sound practical advice on how the mediator can approach the issue in a sensitive manner. For example, the manual specifies that mediators in these types of cases should have specialised competence/training on violence. The courses offered to mediators in these types of cases include awareness of phenomena, understanding of processes and skills training. The manual also includes information on the types of factors that make a case involving domestic violence poorly suited for mediation.⁹⁶

Some civil society organisation report, however, that the procedures established by the manual are not always followed. For example, one crisis shelter reports that victims of violence do not receive detailed information about what mediation entails, which means that the police do not ensure informed consent has been given.

Recommendations:

- Parental disputes must be exempt from mediation if there is a history of violence. Family counselling offices must build their competence to ensure they are able to distinguish between cases with high conflict and cases involving violence.
- One must ensure that consent for mediation is informed and given freely in cases involving domestic violence, and special procedures for mediation in cases involving domestic violence must always be followed in accordance with the Mediation Service manual.

⁹⁴ Norwegian Mediation Service (undated).

⁹⁵ Secretariat for the Norwegian Mediation Service (2023) pp. 60–71.

⁹⁶ Secretariat for the Norwegian Mediation Service (2022).

Articles 49 and 50: General obligations and immediate response, prevention and protection

Investigation and clearance of cases involving domestic violence and rape

Domestic violence – prevalence and prosecution

The most recent prevalence survey by NKVTS from 2023 showed that 11 percent of women report having experienced serious physical violence from a partner.⁹⁷ The survey also shows that 69 percent of those who had experienced serious physical violence from a partner chose not to report the violence to the police.

In terms of cases where the abuse is actually reported, the clearance rate is very low. In the period 2015–2021, the clearance rate for reported cases involving domestic violence dropped by 15 percentage points, from 39 to 24 percent.⁹⁸ In 2022 and 2023, the clearance rate for cases resolved by prosecution was 24 percent, compared with 23 percent in 2024.⁹⁹

Rape – prevalence and prosecution

The NKVTS prevalence survey shows that 1 in 5 women report having experienced rape in their lifetime.¹⁰⁰ The number of reported rapes has varied somewhat in the last 5 years, but remains relatively stable at between 1,500 and 1,700 cases per year.¹⁰¹

Rape cases have been an express priority for the police and the prosecuting authority for many years. At the same time, the clearance rate for these types of cases is the lowest it has been since 2013. The cases are handled by investigators and prosecutors without specialised expertise, and in 2019, the National Criminal Investigation Service (Kripos) discontinued the rape team with expertise in the investigation of rape cases.¹⁰²

The acquittal rate in rape cases has steadily increased over the last five years. In 2024, the acquittal rate was at 37 percent, and there were only 87 rape convictions

⁹⁷ NKVTS (2023) p. 103.

⁹⁸ Office of the Auditor General (2022) pp. 15–16.

⁹⁹ Director General of Public Prosecutions and National Police Directorate (2024) p. 54.

¹⁰⁰ NKVTS (2023, p. 71. The survey covers rape cases involving force/coercion and rape cases where the victim is unconscious or asleep, but does not cover rape without consent, which would be covered under the new provisions on rape in Section 291 of the Penal Code.

¹⁰¹ Director General of Public Prosecutions (2025) p. 26.

¹⁰² NOU 2024: 4 p.14.

in 2024.¹⁰³

Factors that are barriers to reporting

Many civil society organisations point to long processing times, high drop rates and few convictions as key factors that could help explain why so many victims choose to not report intimate partner violence and rape to the police.¹⁰⁴ In addition, victims of violence can have prior experiences that mean they do not trust the police and the legal system. This may be an additional barrier in their encounter with the legal system and support services. Several organisations emphasise that this is especially the case for women with minority or indigenous backgrounds, or women who have additional risk factors, such as mental health disorders or addiction problems.

Residence on an independent basis

Several organisations point out that women who have been granted residence on grounds of family reunification have protection from being forced to remain in violent relationships through the so-called “abuse provision” in Section 53 (1) (b) of the Immigration Act. This provision allows for them to apply for residence on an independent basis if they have experienced domestic violence. Civil society organisations find, however, that few people are aware of this provision, and that women refrain from reporting violence for fear of losing their residence permit. In order for this key provision to work as intended, we need better collaboration between authorities like the Directorate of Immigration (UDI), Nav, health services and crisis shelters, to ensure documentation and support for victims of violence.

A recent report by the Equality and Anti-Discrimination Ombud (LDO) furthermore shows that the threshold for what is considered abuse under this provision is too strict, and that UDI’s practices for the assessment of and emphasis on different types of violence vary considerably. In addition, the LDO expresses concern that the requirement of “reduced quality of life” could lead to the threshold of what is considered abuse being set too high.¹⁰⁵ Civil society organisations emphasise that immigration authorities have a responsibility to ensure that the legal framework and practices reflect current human rights standards, so that all women who need it actually have access to protection from violence.

Regional differences and lack of resources

Several civil society organisations describe considerable regional variations in how

¹⁰³ Kolsrud (2025) and Director General of Public Prosecutions (2025).

¹⁰⁴ Prop. 36 S (2023–2024). Long processing times also often lead to sentence discounts in court proceedings.

¹⁰⁵ LDO (2025) p. 9.

the police and prosecuting authorities handle cases involving domestic violence. While there is some awareness of this issue, a lack of resources and expertise often means that follow-up and investigative quality vary between police districts. There are few forensic specialists with relevant expertise, and they are geographically far apart, which means that many cases are handled by police officers without specialist backgrounds. This requires strict training, guidance and control procedures, as well as clear and verifiable requirements for documentation and storage of evidence.

Several civil society organisations emphasise that specialist sections investigating domestic violence, such as RISK, so far are limited to Oslo and other large cities.¹⁰⁶ The RISK section focuses on the prevention of domestic violence and protection of victims of violence. Their work is based on an integrated approach to protection and psychosocial support, where risk analysis specialists within the police work closely with representatives from health and social services. This teamwork covers risk assessment, risk management, information and guidance, support interviews and coordination with various support services.¹⁰⁷

Several civil society organisations emphasise the need for earmarked resources for investigation of abuse cases in all police districts.

Accessibility and alternative options for reporting violence

Some crisis shelters report that the police in some cases will come to the shelter to conduct interviews or receive statements from victims of violence. This practice is considered safe and good by shelter staff and emphasised as a measure that should be continued and expanded. At the same time, reports show that there are considerable differences from district to district and even from investigator to investigator.

Civil society organisations furthermore point out that there is currently no simple and accessible solution for reporting domestic violence or report concerns digitally through the website of Norwegian police. This can be a barrier for those who live with ongoing violence and who are unable to leave their home for several hours at a time in order to go to a police station in person. The option to file a report digitally is emphasised as an important measure to lower the threshold to seek help.

¹⁰⁶ A pilot project was initiated in 2025, where the RISK method has been implemented in three new police districts. See Director General of Public Prosecutions (2025) p. 55.

¹⁰⁷ Menon (2025) p. 53.

Subsumption of intimate partner violence: less serious penal categories

Civil society organisations report that one barrier to proper investigation and follow-up of cases involving abuse in close relationships (Section 282 of the Penal Code) is a subsumption to a less serious penal provision, often assault. As a result, these cases are transferred to units that do not have specialist expertise.

It has furthermore been pointed out that the understanding of what constitutes “close relationships” varies. Boyfriend/girlfriend relationships are not covered by Section 282, and the conditions for cohabitation are often interpreted more stringently than a common linguistic interpretation would indicate. This means that many cases involving violence cannot be investigated as abuse in close relationships, and serious cases are instead reclassified as offences with a shorter period of limitation. The result is an under-reporting of the prevalence of this type of violence.

Recommendations:

- Reestablish the rape team within Kripos to ensure rape cases are investigated by officers with specialist expertise.
- Earmarked funding for the police and prosecuting authority for investigation of cases involving violence and sexual offences.
- The effort to implement RISK in all Norwegian police districts should be prioritised.
- Immigration authority practices for cases involving the so-called “abuse provision” of the Immigration Act should be reviewed to ensure that all victims of violence have a true opportunity to leave their violent partners. The requirement of “reduced quality of life” should be removed.
- Provide alternative options for filing a report in cases involving violence and sexual offences beyond going to the police station in person.
- Ensure that cases involving violence in less formalised romantic relationships are covered by the so-called abuse provision and ensure uniform practices for handling these cases.

Article 51: Risk assessment and risk management

Risk assessment tools: SARA:SV and PATRIARK

The police have used the risk assessment tools SARA:SV and PATRIARK in their prevention efforts against intimate partner violence and honour-based violence

since 2013 and 2017, respectively.

Both SARA:SV and PATRIARK are research-based risk assessment tools that include guidelines for performing structured assessments of the risk of violence in cases involving intimate partner violence and honour-based violence, respectively. These tools make it possible to identify the risk of future intimate partner violence in individual cases, and to prevent intimate partner violence from occurring by implementing resources where they are most needed.¹⁰⁸ Several organisations that work directly with victims and perpetrators of violence also report that they use simplified versions of these tools.

Under national instructions for risk assessment and prevention of intimate partner and honour-based violence (2022), all cases involving intimate partner violence and honour-based violence must be subject to risk assessment using SARA:SV or PATRIARK.¹⁰⁹ Civil society organisations, however, report that compliance with this requirement is not found in all police district, and especially not if they have reduced capacity. Crisis shelters, however, often find that they have to push in order to get the police to carry out and follow up on risk assessments. Several civil society organisations report considerable variation in which police district use these tools and how systematically they are applied.

The experiences of civil society organisations are supported by a recent evaluation of the police's use of risk assessment tools in these types of cases, performed by Menon Analytics.¹¹⁰ This report points out that the capacity to perform risk assessments using SARA:SV and PATRIARK in the police districts is found by many to be limited, including by risk analysts and by experts in the field. Many report a shortage of both personnel and time to perform the risk assessments. Representatives from some districts report an increase in cases and problems handling the case load with the resources at their disposal, which leads to cases accumulating. Several of the respondents interviewed about their use of the tools describe this situation as concerning; they fear that serious incidents may not be prevented in time.

It was also pointed out that the time aspect is central to risk assessments, as the effect of the risk assessment and accompanying intervention is stronger the closer to the incident risk is assessed. A considerable backlog of risk assessments could

¹⁰⁸ NOU 2020: 17, pp. 84–85.

¹⁰⁹ Menon Economics (2025) p. 5.

¹¹⁰ Menon Economics (2025) s. 38.

therefore entail that the prevention effort is less successful.¹¹¹ Both risk analysts and experts interviewed pointed out that clear prioritisations from management is crucial for making sure that risk assessment efforts receive the appropriate attention. Many point out that additional funding for hiring dedicated prevention analysts is an important step toward ensuring that cases involving intimate partner and honour-based violence are made a priority.¹¹²

Other limitations in application and practice

Requirement of filing a report – in violation of Convention provisions

The evaluation points out that there is a discrepancy between national legislation and Convention obligations pursuant to Article 51. The Istanbul Convention does not require a report having been filed as a condition of risk assessment, but according to national guidelines, a formal complaint is normally required as the basis for such assessment. This means we risk leaving out cases where, despite the lack of a formal complaint, a risk assessment is needed.¹¹³

The evaluation recommends revised guidelines that make it clear that risk assessments must include documented observations from third parties, even without a formal complaint. This will help ensure compliance with the Convention's provisions and make it possible to implement early intervention against violence in more cases. This change in approach, however, will increase workloads for risk analysts who use tools like SARA:SV and PATRIARK. It is therefore important that such a change be accompanied with a sufficient increase in the allocation of resources for risk analysis work.

Lack of transparency and access

Another weakness pointed out by civil society organisations is that these tools are not accessible by the public, and neither the victim of violence nor their legal counsel necessarily get access to the risk assessments made by the police. This makes it difficult for women to supplement or correct the assessments, even though research shows that the victims' own assessment of risk may be a key supplement to professional assessments. The lack of access creates uncertainty and could lead to women feeling the need to personally document risk and implement/finance their own safety measures, such as protection for their home or

¹¹¹ Menon Economics (2025) p. 37.

¹¹² Menon Economics (2025) p. 37.

¹¹³ Menon Economics (2025) pp. 84–45.

digital accounts.

Some civil society organisations also point out that the SARA and PATRIARK assessment will not necessarily automatically be included in the criminal case file when the case is forwarded to the courts. This could lead to the courts issuing rulings based on incomplete information.

Permanent intimate partner homicide commission

Based on recommendations from the Commission for Intimate Partner Homicide, the Government has established a permanent Commission on Intimate Partner Homicide.¹¹⁴ The Commission pointed out that a permanent commission could contribute to the prevention of future intimate partner homicides.

The Commission for Intimate Partner Homicide will review homicide cases where the offender is a current or former partner. The purpose is to learn from mistakes and further develop efforts to prevent serious intimate partner violence and intimate partner homicide. The Commission began its work in April 2025.

Norwegian civil society is positive to the establishment of a permanent Commission, but some point out that the Commission in time also should review attempted homicides in order to gain important knowledge from women who have survived life-threatening violence.

Recommendations:

- Ensure that all police districts comply with the requirement for risk assessment using SARA:SV and PATRIARK in cases involving intimate partner violence and honour-based violence.
- Strengthen capacity by allocating additional resources for more dedicated risk analysts.
- Revise the national guidelines to perform risk assessments without requiring a formal complaint.
- Give victims of violence access to police risk assessments where appropriate.
- Establish a procedure for collaboration between the police and civil society organisations.
- Expand the mandate of the Commission for Intimate Partner Homicide to also include attempted homicide.

¹¹⁴ Ministry of Justice and Public Security (2024a).

Articles 52 and 53: Emergency barring orders and restraining or protection orders

The Commission on Intimate Partner Homicide presented its report in late 2020.¹¹⁵ The report includes reviews of 19 intimate partner homicides. In 15 of 19 cases, the victim was a woman, and the Commission emphasised that women are the victim in a majority of cases involving serious intimate partner violence.¹¹⁶ The reviews showed that most intimate partner homicides occurred following one or more precursors, and that there had been intimate partner violence before the homicide in all 19 of the cases. The Commission concluded that the police and support system did not implement preventive measures that could have reduced the risk of serious intimate partner violence or femicide in time.¹¹⁷

The same was pointed out by the Office of the Auditor General in a report from 2022, which criticised the approach of Norwegian authorities in cases involving domestic violence and intimate partner homicide.¹¹⁸ The report emphasised serious systemic weaknesses related to restraining orders, such as a lack of clarity among support services on how to report violence, and a lack of follow-up on protection measures from the police.

The number of homicides committed by current or former partners has remained consistently high in the last ten years. In 2024, as many as 65 percent of all homicide victims had a close relationship with the person who killed them, and Kripos reports that the number of homicides where women are killed by someone they are in a close relationship with is increasing.¹¹⁹

Protection and restraining orders

While protection measures exist, in the form of protection and restraining orders, Norwegian civil society points out that these do not, in practice, work as immediate and permanent protection measures for most victims of violence. Insufficient resources and a lack of prioritisation of these types of cases mean that many victims of violence do not get the protection they need.

A protection order (Norwegian: *kontaktforbud*) can be imposed against a violent

¹¹⁵ NOU 2020: 17, p. 3.

¹¹⁶ NOU 2020: 17, p. 20.

¹¹⁷ NOU 2020: 17, p. 19.

¹¹⁸ Office of the Auditor General (2022) pp. 8.

¹¹⁹ National Criminal Investigation Service (2025) p. 4.

offender by the court in connection with a conviction for a criminal offence.¹²⁰ Protection orders may be imposed for more or less indefinite time periods. As protection orders may only be imposed by the courts in a criminal conviction, they are not a suitable means of protection in cases that are dropped or in cases where the offence is subsumed under a less serious penal provision.

Restraining order (Norwegian: *besøksforbud*) can be imposed on a violent offender, either on its own or in combination with a so-called reverse personal safety alarm. The restraining order may be imposed by the police for up to one year at a time, without requiring a conviction.¹²¹ Formally, the victim is not required to file a complaint, but several civil society organisations point to police practices as a de facto requirement for such a complaint. In addition, several organisations point to the threshold of being granted a restraining order being too high, and the duration is normally very short (3–6 months). A renewal of the restraining order normally requires a violation of the order by the violent offender, which subjects the victim to more risk.

The rules for restraining orders require weighing the offender's right to freedom of movement against the victim's right to life, freedom and safety. Many civil society organisations find that the police and the courts often attach too much weight to the offender's right to freedom of movement, without taking the victim's situation sufficiently into account. The rules for restraining orders have not been revised or amended since ratification of the Istanbul Convention. In order for Norwegian law to be in alignment with the Istanbul Convention and the ECHR, one must perform a true weighing of interests, where the victims' right to protection is given precedence in these types of cases.

It should be possible to implement protective measures for an unlimited time or until the victim themselves requests for the measure to be lifted. Geographic restraining orders should be designed to give the victim of violence the freedom to safely move around their local community, and it should be possible to define extended protection zones when necessary.

While violation of protection and restraining orders can be considered a criminal offence, several civil society organisations report that such violations often have no consequences, or that sanctions are not imposed until there have been multiple, serious violations. Many say that digital violations of protection and restraining

¹²⁰ Section 57 of the Penal Code.

¹²¹ Section 222a (4) of the Criminal Procedure Act.

orders are not taken sufficiently seriously. Insufficient investigation and insufficient evidence collection also weaken enforcement of these orders, and many point out that in practice, the victim is often the one who has to document violations of protection and restraining orders.

Restraining orders barring the offender from their own home

While the legal framework does include the option to impose restraining orders where the offender is barred from their own home, civil society organisations find that this is seldom imposed against violent offenders. Crisis shelters and other civil society organisations report that the female victim and her children are usually the ones who have to leave the home. The police hesitate to impose restraining orders that bar the offender from their own home or contact with their children in consideration of visitation and parental contact, and women who are victims of violence therefore risk not receiving sufficient protection in acute situations. Civil society organisations argue that the police should develop clear guidelines to consider restraining orders where the offender is barred from their own home in cases where there is suspicion of gender-based violence/domestic violence.

Several organisations believe that the police should be obligated to implement temporary barring and restraining orders in cases where there is a risk of further or serious violence, and that these measures should remain in place until the risk is considered to have passed.

Increase in the use of reverse personal safety alarms

Amendments to the Criminal Procedure Act were adopted in 2024 to include orders of reverse personal safety alarms.¹²² Reverse personal safety alarms require the offender to wear an electronic ankle monitor preventing him from entering a geographically defined exclusion zone. If the offender enters the exclusion zone or attempts to remove the monitor, the police will be notified and will implement protection measures. Civil society believes that reverse personal safety alarms are an important measure to protect victims and shift the burden onto the offender in situations where threats are involved.

The amendments from 2024 entail, among other things, that the police may order a violent offender to wear a reverse personal safety alarm without having to go through the courts. In the wake of these amendments, the use of reverse personal safety alarms has increased many times over, from approx. 20 orders per year to

¹²² Prop. 128 L (2022–2023).

191 orders in 2024.¹²³

In April 2025, a protection order was imposed on an offender in combination with an unprecedentedly large geographical area of 80,051 km² after serving out a sentence for, among other offences, aggravated abuse in close relationships and threats against his wife and children.¹²⁴ This case shows that a reverse personal protection alarm can be a key tool for keeping the victim safe and giving them freedom of movement in a relatively large area.

Recommendations:

- Violation of protection and restraining orders should, as a norm, lead to reverse personal safety alarm orders or more stringent sanctions, depending on the severity of the violation.
- It should be possible to implement protective measures for an unlimited time or until the victim themselves requests for the measure to be lifted.
- Geographic restraining orders should be designed to give the victim of violence the freedom to safely move around their local community, and it should be possible to define extended protection zones when necessary.
- Practices for imposing restraining orders should be reviewed in consideration of Norway's human rights obligation to protect victims of violence.
- Authorities should take on more responsibility for the collection of evidence, including through use of technical solutions that could help prevent order violations and provide documentation.
- Practices for imposing restraining orders where the offender is barred from their own home should be reviewed.
- Restraining orders where the offender is barred from their own home should be used more frequently in cases where necessary to protect the victim of violence.

Article 56: Measures of protection

In December 2024, the Norwegian Government invited comments on a proposal for the Norwegian Correctional Service to have an obligation to give notice on sentence

¹²³ Gangnes (2025).

¹²⁴ LH-2024-182441, also discussed in Einangshaug (2025).

execution.¹²⁵ The purpose of this legislative proposal is to ensure that victims and survivors in cases involving the violation of someone's integrity receive important information about the offender's sentence execution.

The legislative proposal proposed to link this obligation to give notice to specific offences, rather than a more discretion-based obligation. The obligation to give notice would apply in cases that involved serious violations against someone's liberty and peace, as well as violent and sexual offences.

The amendment would entail that victims and survivors in these types of cases receive notice of the offender is granted leave, probation or a community sentence with an ankle monitor. The proposal also includes notification for media appearances by the offender or the offender's death, and for the victim to be informed of the region where the sentence execution will take place. This obligation to give notice would be conditional on the victim having requested it. If these amendments are adopted, they will have considerable impact on the ability of victims of violence and abuse to plan activities and live without fear of accidentally running into the offender without notice.

Even though the invitation for comments went out almost one year ago, the Government has yet to take further action. Norwegian civil society urges the Government to prioritise this legislative proposal, so that victims of violent and sexual offences, as well as other offences where their integrity was violated, have the opportunity to receive important information.

Recommendations:

- The Government must implement the proposed amendments to the regulatory framework concerning notification in order to strengthen the legal protection of victims and survivors.¹²⁶

Emerging trends

Financial violence, fraud and BankID theft

Financial violence is included in the various forms of violence regulated by the Istanbul Convention, cf. the Convention's Article 3. Consequently, Norway has an

¹²⁵ Ministry of Justice and Public Security (2024b).

obligation to implement the measures necessary to prevent this form of violence as well.

In recent years, several legal aid providers and other civil society organisations have observed a sharp increase in cases involving financial violence and identity theft. This includes situations where the victim is not permitted to have bank accounts or credit/debit cards, where she is denied money for food or doctor's visits, or where the offender takes out loans or other debt in the victim's name. Civil society finds that immigrant women are disproportionately at risk of this type of violence, which exists at the intersection of digital and financial violence, due to poor knowledge of the system, poor digital proficiency or language barriers.

On violence in the form of BankID theft and fraud

Many women experience financial violence from their partner or others close to them. One of the ways this violence takes place is that the offender abuses the woman's BankID (a type of digital ID used in Norway) to establish credit agreements, for which she is then held liable. In these types of cases, the gender perspective is especially relevant. An analysis performed by the SODI project in 2022 shows that approx. 80 percent of victims of identity theft from people close to them are women.¹²⁷ Use of coercion, threats and violence to gain access to another person's BankID or to get the other person to use their BankID is a common problem in situation where this fraud is part of a violent relationship.

For some women, this identity theft takes place without them even being aware of it, e.g. by the offender gaining access to the woman's BankID chip or app. In our current system, it is common practice for victims of fraud to be held personally liable by credit institutions for the debt they have incurred – even in situations where the fraud has been part of a wider violent context. This entails that the victim of violence in some cases has to repay many hundreds of thousands of kroner in unlawful debt after escaping the violent situation.

Legal aid organisations believe that one of the reasons for this is that banks have developed a practice where they do not distinguish between the civil and the criminal aspects of the fraud case. As a consequence of cases involving identity theft often being dropped by the police due to limited resources, the banks often use the decision to drop the case as a conclusive argument for not pursuing the claim of the fraud victim. This entails that the banks incorrectly apply a criminal

¹²⁷ Brataas (2022) p. 26.

standard of evidence in civil cases, thus incorrectly indicating to the fraud victims that the fraud is their own fault. This practice is a significant flaw in the legal protection of victims.

Even in cases where the identity theft is part of a wider context of violence, the victim will rarely qualify for free legal aid through public schemes in civil disputes with creditors. In criminal cases involving abuse and serious domestic violence, the victim is appointed legal counsel paid by the State, but this legal representation does not extend to the civil aspects of the case, even if these are closely connected to the criminal case. As a result, a violent offender may be convicted of abuse in close relationships, but the victim will not get help to manage unlawful claims from creditors for debt established by the offender as part of a wider context of violence. The women in these cases often fall through the cracks and can be left with a burden of debt they are unable to manage.¹²⁸

In connection with the hearing of a proposal for a new Legal Aid Act in the spring of 2025, Parliament decided that cases involving BankID theft and fraud would not be covered by the Act. JURK and the other legal aid organisations are very concerned about a group with pressing needs for legal aid being excluded from public legal aid schemes. This is especially serious, because due to the nature of these cases, the victims will normally not have the resources to pay for legal representation due to the high debt she has incurred.¹²⁹

Recommendations:

- Free legal aid in cases involving identity theft must be included in free legal aid schemes.
- Legal representation for victims should be expanded to also cover the civil aspects of the case. For many victims, this will be the only way they will be able to exercise their rights vis-à-vis the banks.
- Financial institutions should be held accountable when they develop practices that conflict with the provisions of the Financial Contracts Act.
- Broad public information campaigns should be carried out, informing the public of their rights and options in case of fraud, especially their right to reverse unauthorised transactions and cancel loans. Low awareness around these rules is especially problematic considering the short absolute limitation

¹²⁸ In the final report on the legal aid project "ID-juristen", JURK discusses the need for legal aid in these types of cases and why these types of cases should qualify for free legal aid. See SODI (2024) pp. 28–31.

¹²⁹ JURK (2025).

period of 13 months.

- Knowledge of financial violence in the courts should be increased.
- The Contract Act should be revised and updated to reflect the current digital reality, so that contracts established as part of a wider context of violence can be deemed invalid under the provisions of the Contract Act.

Hidden stalking/surveillance

Article 34 of the Convention requires the Parties to take the necessary legislative or other measures to ensure that stalking and persecution are criminalised. Such actions are currently criminalised in accordance with Sections 266, 266a and 298 of the Norwegian Penal Code. Section 266a is especially relevant to these types of cases. In connection with the previous round of evaluations, GREVIO concluded that the provisions align with the requirements established in Article 34 of the Istanbul Convention.

As pointed out by Norwegian civil society in connection with the previous round of evaluations, the current penal provisions do not, in practice, provide women with sufficient legal protection from stalking. The reason for this is that Section 266a of the Penal Code presupposes that it is the offender's intention for the victim to perceive or discover the violation, and this is required for conviction. This means that in situations involving covert recording or surveillance where the victim is not aware of the surveillance, the perpetrator cannot be convicted under this provision.

The fact that this is a loophole in current penal provisions, which entails that women do not have sufficient legal protection against covert surveillance and stalking, has been established in court practice, see for example HR-2019-563 and TOSLO-2020-17472.¹³⁰ In the latter case, a lessor had installed hidden cameras in the apartment a mother and her teenage daughter rented from him. Over a period of 4 years, he surveilled both mother and daughter for the purposes of his own sexual gratification. The court pointed out that the legal framework is inadequate.

In 2021, in response to clear feedback from both civil society organisations and stakeholders in the criminal justice system, the Ministry of Justice sent out an invitation for comments on amendments to the penal provisions to also include stalking and surveillance.¹³¹ The purpose was to close a loophole in the Penal Code and criminalise covert surveillance as well. Even though the invitation for comments went out four years ago, the Government has yet to take further action.

¹³⁰ Aasheim et al. (2025).

¹³¹ Ministry of Justice and Public Security (2021).

Recommendations:

- The Government must immediately take action on the proposed legislative amendments and adopt an expansion of the current penal provisions to include covert/predatory stalking.

Amendments to the Compensation for Victims of Violent Crime Act

According to Article 30 (1), cf. (2), of the Convention, the Parties shall take the necessary measures to ensure that victims of violence have the right to claim compensation from the State to the extent that the damage is not covered by other sources. In 2022, Parliament adopted a new Compensation for Victims of Violent Crime Act. The Act took effect on 01 January 2023. Both in the consultation rounds before the Act was adopted, and in the wake of its enactment, the new Act has been subject to strong criticism. In response to this, an evaluation of the Act has been initiated. The evaluation will be completed by June 2026.¹³²

There are several reasons why the new Compensation for Victims of Violent Crime Act should be amended as soon as possible.

Amendment: The right to compensation is linked to specific violent offences

First, certain serious criminal offences, including abandonment in a helpless state, harassing conduct and serious stalking, have now been completely excluded from the scheme. The same applies to physical assault, threats and repeated violation of restraining orders. Several of these prioritisations disproportionately affect victims of domestic violence, because many domestic violence cases are subsumed into these penal provisions when the offence or evidence does not quite meet the threshold for the so-called abuse provision of the Penal Code. Read more about subsumption of intimate partner violence in the sections on Articles 11, 49, and 50, respectively.

With the right to compensation now being tied to specific penal provisions, this means the right of victims of violence and abuse to seek compensation is now much more dependent on the prosecuting authority's choice of penal provision (subsumption) than it previously were. The prioritisations and subsumptions of the prosecuting authority are often based on procedural issues, prosecution competence or capacity, and should not have definitive impact on the victim's right

¹³² Ministry of Justice and Public Security (2025c).

to seek compensation from compensation authorities.

When the prosecuting authority makes different prioritisations and assessments than the Criminal Injuries Compensation Authority (KfV) would have made, this is not always due to poor police or prosecution work. In some cases it is a natural consequence of the prosecuting authority operating under more stringent standards of evidence in its assessment than the KfV. Norwegian civil society believes that the KfV should have the opportunity to assess these cases individually, like they could under the old Act.

Amendment: party status for violent offender/wrongdoer and short limitation periods

Second, the new Act introduced party status for the offender under the Public Administration Act. When the offender receives notice of the application and is given an opportunity to submit objections and request access, this is highly invasive for the victim. Many have pointed out that this is an immediate deterrent for those who have experienced sexual offences or violence from someone close to them and the case was dropped by the police. Civil society organisations point out that these amendments may be in conflict with the Convention's requirements that mechanisms for claiming compensation must have regard to the victim's safety, cf. Article 30 (2), final clause.

In cases that have been dropped, where the wrongdoer runs no risk of incurring a claim for regress, party status rights under the new Act should be reversed immediately.

In cases where the State, under the old Act, had the right to hold the wrongdoer financially liable for the compensation amount, e.g. on grounds of his conviction in a criminal case, the wrongdoer was not a party to the claim for compensation. Instead, the wrongdoer became a party to the regress claim, with the State as the opposing party. As part of regress proceedings, he had the right to request access to any relevant documents on which the regress claim was based, including health information about the victim. This illustrates that the wrongdoer already had certain rights under the previous Act, but the solution was more accurate and less invasive than the current scheme.

In combination with shorter limitation periods for claims and limited access to legal aid, these amendments constitute such a drastic limitation of the rights of victims

of violence that the Act should be amended immediately.

On victims of rape

The amendments to the Compensation for Victims of Violent Crime Act also affect victims of rape. The Rape Commission emphasised this in their evaluation.¹³³ The Commission concluded that the new Compensation for Victims of Violent Crime Act severely limited the rights of victims of rape, and that victims of rape have been put in a “position that is far worse than previously”. Among other things, the Commission proposed that the time limits for claiming compensation after rape be extended, and that rape victims be given the right to free legal representation in connection with their claim for compensation. The Commission also recommended that the alleged offender not be granted party status in the application process.

In response to the massive criticism of the new Compensation for Victims of Violent Crime Act, Parliament requested that the Government initiate an evaluation of the new Act. Among other things, this evaluation should explore whether the Act has any unintended consequences and whether amendments to the legislation are necessary.

Civil society organisations are positive to an evaluation of the Act. At the same time, it is highly censurable that the new Act was adopted in spite of strong warnings from experts and civil society that the Act would prevent victims of violence and rape from seeking the compensation to which they are entitled.

Recommendations:

- The Government must take action when the evaluation of the Compensation for Victims of Violent Crime Act is complete and implement any legislative amendments and adjustments in practice recommended.
- Input from experts and civil society should carry considerable weight.

Legal protection issues in cases involving sexual harassment

Under Article 40 of the Convention, Norway is obligated to take the necessary steps to ensure that any form of sexual harassment is subject to criminal or other legal sanction. While sexual harassment is illegal under the Equality and Anti-Discrimination Act, very few cases are reported to the Anti-Discrimination Tribunal

¹³³ NOU 2024: 4.

and the courts.¹³⁴ Legal aid providers and others who support victims point out that for most victims, bringing the matter before the court is not a real option for financial reasons. For most victims, the Anti-Discrimination Tribunal is the most accessible option for exercising their rights under the Equality and Anti-Discrimination Act.

Need for legal aid in cases pursuant to the Equality and Anti-Discrimination Act

Norwegian civil society emphasises that the Anti-Discrimination Tribunal is not necessarily a low-threshold service, as intended by legislators. A good number of victims are unable to navigate the relevant provisions or to formulate and submit their case in writing, in either Norwegian or English. As a result, many are completely dependent on legal assistance in this process. In the consultation process for a report to Parliament on sexual harassment earlier this year, the same argument was made by a majority of experts who work with victims of discrimination and harassment.

As recently as the spring of 2023, Norway was criticised by the UN Committee on the Elimination of Discrimination against Women (CEDAW) for not granting free legal aid to victims of sexual harassment.¹³⁵ The UN Committee on Economic, Social and Cultural Rights (CESCR) also recommends free legal aid in cases concerning equality and discrimination.¹³⁶

In order to ensure true and effective protection for victims of sexual harassment, Norwegian civil society believes that violations of the Equality and Anti-Discrimination Act must be included as a prioritised area for free legal aid. Without free legal aid, it is completely out of reach for many to exercise their rights.

Limitations in Tribunal authority

The Anti-Discrimination Tribunal also has limited authority to award compensation and damages. This weakens the potential for victims to achieve justice in the legal system.

In matters concerning compensation for violation of provisions in the Equality and Anti-Discrimination Act, the Tribunal must be “unanimous” and can only award

¹³⁴ Meld. St. 7 (2024-2025) p. 8.

¹³⁵ CEDAW (2020) p. 5.

¹³⁶ CESCR (2016) p. 14.

compensation in simple cases.¹³⁷ The Act does not specify a cap on compensation, but in the preparatory works to the Act, the Ministry stated that the Tribunal's decision-making authority is limited to compensation amounts not exceeding NOK 10,000.¹³⁸ The recent evaluation of enforcement mechanisms in discrimination cases found that this limitation in compensation amounts "could entail that enforcement of rights in discrimination cases is less effective, in addition to the Tribunal not being perceived as a low-threshold service."¹³⁹ Civil society pointed out that there is no reason for the Tribunal's authority to be this limited, especially because adjudication experience is normally required for Tribunal members.¹⁴⁰

In cases pursuant to the Equality and Anti-Discrimination Act, only employers can be ordered to pay damages for non-economic loss by the Tribunal.¹⁴¹ This means it must be possible to identify the person harassing the victim with their employer in order for the Tribunal to award compensation. This means that women who are harassed by a colleague who cannot be identified with their employer have weaker legal protection than women who are harassed by their employer. This furthermore means that there are few effective sanctions and deterrents against the person doing the harassment. Organisations active in this field believe that the Anti-Discrimination Tribunal should have the authority to impose liability for damages on private individual, including for sexual harassment that occurs outside of the workplace. This is important for the anti-discrimination protections of the Act to feel real for victims of harassment.

Recommendations:

- The Anti-Discrimination Tribunal must be authorised to impose liability for damages on private individuals, including for harassment that occurs outside of the workplace, as well as extended authority to award compensation.
- Cases pursuant to the Equality and Anti-Discrimination Act must be included as a priority area under the Legal Aid Act. At a minimum, considerable importance must be attached to statements by the Equality and Anti-Discrimination Ombud in assessment of whether a case should be heard on matters of principle, as proposed by the Legal Aid Committee.

¹³⁷ Section 12 (2) of the Equality and Anti-Discrimination Ombud Act and Prop. 80 L (2016-2017) p. 106.

¹³⁸ Prop. 80 L (2016-2017) p. 95 and Prop. 154 L (2020-2021) p. 34.

¹³⁹ Lund&Co (2024) p. 108.

¹⁴⁰ Section 6 (3) of the Equality and Anti-Discrimination Ombud Act.

¹⁴¹ Section 12 (1) of the Equality and Anti-Discrimination Ombud Act.

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2023	Lov av 09. juni 2023 nr. 30 om grunnskoleopplæringa og den vidaregåande opplæringa (Opplæringslova) (Education Act)

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Prop. 80 L (2016-2017)	<i>Lov om Likestillings- og diskrimineringsombudet og Diskrimineringsnemnda (diskrimineringsombudsloven)</i>
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