



Submission to the Universal Periodic Review of Iceland 39th UPR Session, November 2021

The Icelandic Human Rights Centre, the Women's Rights Association, Barnaheill - Save the Children Iceland, Humanists Iceland, the National Association of Intellectual Disabilities and Amnesty International (the reporting group)

This report is based on the UN Human Rights Council guidelines on submissions to the Universal Periodic Review, and OHCHR's guidelines for submission of reports from NGO's. The report uses common abbreviations for UN treaties and bodies to give room for more information. The report is based on focused issues and areas of competence of the Icelandic Human Rights Centre (ICEHR) and other organizations in the reporting group. The report covers the period from November 2016–June 2021 and focuses on recommendations made during the UPR review of Iceland at its 26th session, meeting no. 4, on 1 November 2016. Recommendations fully implemented or believed to be irrelevant are not included.

The submission is within the limit of 5630 words. The reporting group welcomes the opportunity to submit its views to the UPR on Iceland.



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This report lists the concerns of the reporting group with the Icelandic government's compliance with the recommendations made to Iceland by other United Nations Member States during the previous UPR cycle (session 26, 4th meeting, 1 November 2016), as well as our recommendations.

Some of our concerns and recommendations for Iceland in this report, not exhaustive, include:

- Currently, there is no action plan on migration in place although the government published a draft for such a plan during their consultation forum in March 2021 and opened it for comments until April 9th. The reporting group encourages the Icelandic government to take note of comments made by relevant stakeholders and implement this action plan as soon as possible.
- Currently there is no action plan against trafficking in human beings in place but in March 2019, the Ministry of Justice issued the government's Emphasis on Actions to Combat Human Trafficking and Other Forms of Exploitation. A positive step has been taken with the establishment of a coordination team run by a reception center for victims of violence and the helpline (112) for notifications on human trafficking, but further action is needed. The Icelandic government is encouraged to adequately fund actions for combatting human trafficking and to issue a comprehensive action plan on trafficking in human beings.
- Iceland has yet to ratify the optional protocol to CRPD, the third protocol to CRC as well as CED, OP-CESCR and CMW. The reporting group encourages the Icelandic government to ratify these international human rights instruments.
- A National Human Rights Institution is yet to be established. The Icelandic government is encouraged to establish such an institution as soon as possible and to make use of the expertise, experience, know-how and network of ICEHR for this purpose
- The Icelandic government is encouraged to address the structural conditions which enable and perpetuate human trafficking, which include lack of safe legal routes for refugees and migrants, poverty and massive human rights violations in countries of origin.



Background and Framework

Scope of International Obligations

Iceland is a party to many international human rights treaties.ⁱ However, others have been signed by Iceland but not ratified.ⁱⁱ The reporting group recommends that the Icelandic government ratify the following conventions and protocols to them as soon as possible:

Ratification of the Optional Protocol to CRPD

On 30 March 2007, Iceland signed the UN Convention on the Rights of Persons with Disabilities (CRPD) and the Optional Protocol thereto.ⁱⁱⁱ The Convention was ratified on 23 September 2016 and the Parliament passed a Resolution to ratify the Optional Protocol before the end of 2017. To date, the OP has not been ratified.^{iv} Another Parliament Resolution was passed in June 2019, on the presentation of a law proposal, no later than 13 December 2020 for the implementation of CRPD into Icelandic law and for changes in other relevant legislation for it to be in accordance with the Convention.^v The law proposal is yet to be presented.

- The reporting group recommends that Iceland ratify the OP to CRPD as soon as possible and implement the Convention into Icelandic law and bring about changes to relevant legislation.

Ratification of CED

The UN Convention for the Protection of all Persons from Enforced Disappearance (CED) has not been ratified yet.^{vi} Iceland accepted recommendations (no. 115.10-115.19) to ratify the CED at the previous review.^{vii} It rejected a further recommendation to ratify the CED to receive and consider communications from or on behalf of victims and other States parties, stating that authorities in Iceland had accepted to ratify the Convention and would examine whether to recognize the competence of the Committee. The Convention has been translated into Icelandic and a revision is now being made as to which amendments to national legislation are necessary for its ratification

- The reporting group encourages the Icelandic government to ratify CED as soon as possible.

Ratification of Other Human Rights Conventions and instruments

The reporting group urges the Icelandic government to sign and ratify the following conventions as soon as possible. By doing so the government will be taking important steps towards promoting and protecting human rights in Iceland:

The Optional Protocol to the International Covenant on Economic, Social and Cultural Rights (CESCR-OP), that gives individuals or groups of individuals within the jurisdiction of a State Party, the possibility to submit communications to the ESCR Committee, regarding violations of their economic, social and cultural rights set forth in the Covenant by that State Party. At the previous review, Iceland regretfully merely noted a recommendation to ratify the CESCR-OP,^{viii} but stated that Icelandic authorities would examine whether to ratify this optional protocol.^{ix} At the adoption of Iceland's review by the Human Rights Council the government said that "the question of whether to ratify these protocols deserved a thorough analysis of the domestic and international implications and a discussion, both on the political level and among domestic experts", stating that "a broad ranging



domestic consultation process would be necessary in order to reach a sufficiently well founded position”.^x No such consultation process has taken place since then.

- The reporting group encourages the Icelandic government to ratify the CESCR-OP as soon as possible.

International Convention on the Protection of the Rights of all Migrant Workers and Members of their Families (CMW).

At the previous review, Iceland rejected recommendations to proceed with the ratification of the CMW. No steps have been taken towards ratification.

- The reporting group encourages the Icelandic government to ratify the Convention as soon as possible.

The third Optional Protocol to CRC.

At the previous review, Iceland merely noted recommendations to ratify the CRC-OP-IC,^{xi} but stated that Icelandic authorities would examine whether to ratify this optional protocol.^{xii} In June 2021, a Parliament resolution for a comprehensive national action plan on the rights of the child (implementing the CRC), was passed by the Icelandic Parliament. One of the proposed actions (action 6.2) is for the ratification of the third OP.^{xiii}

- The reporting group encourages the Icelandic government to ratify the third OP to CRC as soon as possible.

Incorporation of International Obligations into Domestic Law

The only human rights conventions incorporated into domestic law are the European Convention for the Protection of Human Rights and Fundamental Freedoms and the Convention on the Rights of the Child (CRC).

- The reporting group urges the Icelandic government to incorporate other international human rights convention such as CEDAW and CRPD into domestic law, and to educate the Icelandic public on our international commitments as regards gender equality and the rights of people with disabilities in Iceland.

Constitutional and Legislative Framework

A Constitutional Council was formed in 2011,^{xiv} which prepared a proposal for a revised Constitution for the Republic of Iceland and put it before Parliament. The proposal was met with much debate, did not pass and has repeatedly been presented before Parliament,^{xv} including during the current session January - June 2021 and the Prime Minister presented her own bill for amendments to the Constitution, which mostly concerns executive powers and the President but also includes proposals on protection of climate and natural resources.^{xvi}

- The reporting group echoes the recommendation to safeguard all human rights provisions in the continuing work on revising the Constitution, which Iceland accepted at its first UPR review, and encourages the Icelandic government to ensure its implementation.^{xvii}



Policy measures

Promotion and Protection of Human Rights in Iceland

In 2017, the government established a Governmental Steering Committee on Human Rights, consisting of representatives from all ministries. The Committee's aim is to increase cooperation and coordination on human rights among authorities.^{xviii} However, there is no national policy on human rights in Iceland and no national human rights institution (NHRI).

At the previous review, Iceland accepted numerous recommendations (no. 115.26-115.40) to establish a NHRI.^{xix} In February 2021, an inter-ministerial working group was established, for developing ideas for the establishment of a NHRI.^{xx}

ICEHR has assumed most of the functions of a national human rights institution as set out in the UN Paris principles, though its powers, independence and financing are not established by law. Therefore, the Centre offers its expertise, experience and network to the Icelandic Government to be of use for the establishment of a NHRI.

- The reporting group encourages the Icelandic government to establish a NHRI as soon as possible and to make use of the expertise, experience, know-how and network of ICEHR for this purpose.

Implementation of International Human Rights Obligations

Equality and Non-Discrimination

Two anti-discrimination acts entered into force in 2018, on Equal Treatment irrespective of Racial and Ethnic origin^{xxi} and on Equal Treatment in the Labour Market.^{xxii} Recently, the government presented, during their consultation forum, a draft bill expanding the scope of the Act on Equal Treatment irrespective of Racial and Ethnic origin to include discrimination on other grounds, e.g. religion, philosophical conviction, disability, reduced working capacity, age, sexual orientation, gender identity, sexual characteristics or gender expression.^{xxiii}

- The reporting group recommends that the Icelandic government present a bill for the expansion of the Act on Equal Treatment irrespective of Racial and Ethnic origin to the Parliament as soon as possible where discrimination on other grounds is included, for example, religion, philosophical conviction, disability, reduced working capacity, age, sexual orientation, gender identity, sexual characteristics or gender expression. It also recommends that the government should undertake an awareness raising campaign on the anti-discrimination legislation and the remedies available.

Right to Work, Pension and Equal Pay

The retirement pension is still below the level required to enjoy the right to an adequate standard of living.^{xxiv} Similarly, the disability benefit is lower than the amount paid in unemployment benefits and far below the minimum wage.^{xxv} Many people with disabilities do not have the opportunity to work due to either their disability and/or the inflexibility of the labor market which offers few work opportunities to people with disabilities.



Also, the group of people not having lived in the country for a total of 40 years between the ages of 16-67 and therefore not enjoying the entitlement to a full retirement pension is growing.

- The reporting group encourages the Icelandic government to continue efforts in ensuring all retired and people with disabilities will be able to enjoy an adequate standard of living both through the provision of adequate levels of social security benefits and pensions and work opportunities.

Women's Rights and Gender Equality

Women in the Police Force

Albeit that the National Police Commissioner, the Commissioner of the Reykjavík Metropolitan Police and other police commissioners are women, women are still underrepresented in the Icelandic police force,^{xxvi} and the number of women police officers who have been sexually harassed is still high. According to a report commissioned by the National Commissioner in 2013, 31% of women police officers have been sexually harassed while working. The harassers were colleagues, superior officers and members outside of the police force.^{xxvii}

- The reporting group encourages the Icelandic government to address harassment in the police force and guarantee women's right to be free from harassment and to safety at work including in the police force increase the number of women serving within the police.

Elimination of gender stereotypes and discriminatory attitudes

Few comprehensive measures have been undertaken to eliminate gender stereotypes and discriminatory attitudes about the roles and responsibilities of women and men although national school curricula are gender sensitive and equality has been one of the six pillars of compulsory (grades 1 – 10) and secondary education (high school/further education) since 2011.^{xxviii} Classes in gender studies and feminism have also been offered in majority of secondary schools in the country.

- The reporting group supports the recommendation made by the Republic of Ecuador (no. 115.66) under the revision of Iceland at the 26th UPR session and encourages the Icelandic government to take measures to eliminate gender stereotypes for the roles and obligations of women and men, in particular through awareness-raising campaigns and education.

Violence against Women

The procedural approach to domestic violence since 2014 relies on increased cooperation, knowledge sharing and procedures in domestic violence cases between the police, social services, and child welfare services. The aim of the project includes ensuring the safety of city residents in their homes, providing better services to victims and improving the situation of children and others in vulnerable situations living with domestic violence.^{xxix} Victims of violence can get help from grassroot associations and social service.^{xxx} A treatment and knowledge center on violence in close relationships offers treatment to perpetrators of domestic violence^{xxxi}The Reykjavík Metropolitan Police also instituted changes in its organization in 2015, whereby more emphasis is placed on human trafficking and sexual violence.^{xxxii}



- The reporting group encourages the Icelandic government to provide adequate financial resources to the Icelandic Police and other institutions party to this coordinating mechanism to carry out assistance to victims of sexual violence and conduct investigations in a satisfactory manner.

Despite good efforts made by the government in recent years, the ratio of migrant women seeking help from the Women's Shelter in Reykjavík continues to be disproportionately large. In 2020, 22% of women seeking help and advice were migrants.^{xxxiii} According to the Women's Shelter's study from 2020 this disparity can at least in part be traced to the fact that migrant women do not have the same family safety net as Icelandic women.^{xxxiv}

- The reporting group encourages the Icelandic government to continue providing support to migrant women in abusive relationships and keep up efforts for assisting and empowering these women.

Administration of Justice

It has been noted with concern by various human rights treaty bodies, such as the CEDAW^{xxxv} and CERD^{xxxvi}, as well as by reviewing states during the 26th UPR session, that the number of reported rapes to the police in Iceland is high, in comparison with the number of rape prosecutions undertaken.^{xxxvii} It has also been pointed out that doubt is an obstacle to conviction, but not to prosecution, and that it is the role of the courts to determine whether a charge is proven or not.

The reporting group expresses its concern at the high number of dismissals of charges of rape and other sexual violence by the State Prosecutor and the low number of convictions in cases of rape and other sexual violence.^{xxxviii} In March 2021, a group of nine women filed a complaint against the Icelandic State before the European Court of Human Rights for violation of their right to a fair trial. The women reported rapes, domestic violence and sexual harassment to the police, but all cases were dropped by the prosecution authorities. The ECHR has requested for the Icelandic state to answer why cases of four of the women's cases were dropped and whether that was in accordance with the European Convention on Human Rights. According to the plaintiffs there were evidence in all of the cases which should have led to them going to trial. The Icelandic state has until fall 2021 to answer the Courts questions.^{xxxix} Most reports on violence made by women to the police never go to court. For example, in 2013 (the most recent overview) only 17% of rape cases ended with prosecution and only 13% in conviction. Cases were dropped due to passing of statute of limitations, witnesses were not called in for questioning, evidence such as injuries, certificates from psychologists, phone video recordings, even crime scene evidence were given little merit etc.^{xl} Recent changes in the General Penal Code, namely the change of the legal definition of rape to a consent-based one, do not seem to be reflected in judgements in rape cases, older criteria are still being used.

- The reporting group recommends that the government ensures adequate funding to the investigation and prosecution of sexual offences and domestic violence cases as well as to the training of police, prosecutors and judges on the legislative intent as regards penal stipulations on sexual offences and violence in abusive relationships, in particular as regards the Penal Code stipulation on rape which is based on voluntary consent.

A report issued in August 2020 by the National Commissioner of the Icelandic Police states that people with disabilities are much more likely to be subject to violence than people who are not living with disabilities and that convictions in cases of violence and abuse of people with disabilities are far less

likely compared to cases of non-disabled victims.^{xli} A bill on amendments to the Act on Criminal Procedures, i.a. aimed at improving the status of victims with disabilities in the criminal justice system, has been presented to parliament.^{xliii} However, more efforts and education are needed.

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

Women on Boards of Corporations

In the last 11 years Iceland has claimed the top spot of the World Economic Forum's Global Gender Gap Index.^{xliii} In 2010, amendments to the Public Limited Companies Act and the Private Limited Companies Act mandated that boards for companies with 50 employees or more have a set quota of 40% of either gender.^{xliiv} This legislation is certainly welcome, but it is of concern that the gender quota law only applies to companies with 50 employees or more, an especially high number considering the average size of an Icelandic company. According to article 18 of the Gender Equality Act, companies and institutions with 25 employees or more are required to adopt gender equality plans or mainstream gender equality into their personnel policy.

- The reporting group encourages the Icelandic government to amend the legislation on gender quotas in the boards of corporations, so that it applies to companies with 25 employees or more.

The Gender Pay Gap

The unadjusted gender pay gap in Iceland in 2019 was 14%.^{xliv}

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

The Equal Pay Standard

The Icelandic government has taken positive steps in developing the standard ÍST 85:2012 – Equal Pay Management System, an ISO certification system, written in cooperation with the Icelandic Confederation of Labour and Federation of Icelandic Industries, which would be able to be used to confirm that women and men working for the same company are paid equal wages and enjoy equal terms of employment for the same jobs or jobs of equal value.

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

Children's Rights

Child Protection

It is of concern that not enough resources have been allotted to the child welfare and protection services. Although service providers work in a responsible and conscientious manner, it has been common practice in social services over the years that there are too few employees and they have caseloads that are too large.^{xlvi} Recently, the government has allotted extra funding to the child welfare system, i.a. to meet with the effects of the COVID-19 pandemic.



Domestic violence, including violence against children, is a serious concern in Iceland and by nature not a very visible problem.^{xlvi} The new approach in cases of domestic violence, adopted by the Icelandic Police, has brought the situation of children victims to domestic violence into focus (whether or not the violence is exercised upon the children themselves or on family members) and instigated actions which are taken for rendering necessary services to them, such as psychological assistance, counselling etc.^{xlvi}

Many organizations working on children's issues claim that, in some situations, children are still not being listened to and their wishes disregarded. A Parliament resolution for a comprehensive national action plan on the rights of the child (implementing CRC), was passed in the Parliament in May 2021. It prescribes inter alia the right of children to be heard and guidelines on how to assess and determine the best interests of the child.

- The reporting group urges the Icelandic government to ensure adequate financing of the child protection services and to ensure that children are listened to and take part in decisions regarding their well-being, for example in custody cases.

In 2016, around 14% of children in Iceland were at risk of living in poverty, according to a study from Barnaheill - Save the Children Iceland, and more children than adults live in poverty, unlike in the other Nordic countries.^{xli} It is important to eradicate poverty in Iceland and no child should have to endure poverty. The link between poverty and all forms of violence, exclusion and neglect has been demonstrated. The children of disabled parents, single parents with and without custody, and migrants are more likely than others to live in poverty.¹

The reporting group urges the Icelandic government to ensure equal opportunities for children without discrimination, such as by ensuring acceptable financial support for families in order to promote equal access to resources for all children. It is important to individualize support and improve the access of children living in poverty to a variety of opportunities to enjoy their talents, especially for children to continue their education regardless of their parents' financial situation

Migrant children

As regards migrant children, the Acts on Compulsory School and Secondary Upper School stipulate that every school has to prepare a welcoming plan for children whose mother tongue is not Icelandic.^{li} Despite these requirements, provisions and services for migrant students and their parents vary considerably from one school to another. The percentage of migrant children dropping out of school after finishing compulsory education is still high.^{lii}

- The reporting group encourages the Icelandic government to keep supporting actions for diminishing dropout rates for migrant and other students after finishing compulsory education.



Promotion and Protection of the Rights of Specific Groups, Including Migrants, Minorities and Indigenous peoples

Migrants

Most immigrants in Iceland are active in the labor force.^{liii} They commonly hold low-paid and gender-segregated jobs. They face difficulty with finding a job befitting their education,^{liv} even though various steps have been taken towards recognizing education from other countries. ^{lv} Education is now recognized based on the EU qualification framework EQF^{lvi} and implemented in Icelandic NQF.^{lvii} Also, for vocational and industrial professions, a skills evaluation program has been put in place so that if additional courses or skills are needed for education to be recognized, the applicant is offered the opportunity to add these to their education so that they can work in their profession.^{lviii} The unemployment rate for migrants is still higher than among Icelanders.^{lix}

Courses in Icelandic, although offered, are not available everywhere and not accessible to all, for example those not in the labour market. The supply of language classes has, however, been improving.

There is no government action plan in place on migration however one has been composed and is under revision of the Ministry of Welfare.^{lx}

- The reporting group encourages the Icelandic government to adopt an action plan on migration as soon as possible and to undertake further action towards diminishing the unemployment rate among migrants.

Safe and regular pathways to entry

Refugees in Iceland can be granted international protection after arriving to the country themselves, or by being invited by the government to resettle through the government's resettlement programme, or through family reunification. The number of measures enabling regular access to Iceland for people in need of protection should be increased, for example through community sponsorship. The pathway has worked particularly well when it comes to integration of refugees into new homes.^{lxi} This is a process where individuals, groups or communities offer to become financial sponsors and supporters of refugees in their own community for a specified period, usually for one to two years at a time.

- The reporting group encourages the Icelandic government to increase safe and legal pathways to Iceland, for example through community sponsorship.

Aggravating circumstances

One of the recommendations (no. 115.56) made by the reporting group under the previous UPR cycle (session 26, 4th meeting 1 November 2016) was for Iceland to introduce a criminal law provision that expressly considers the racist motivation of an offence as a specific aggravating circumstance.



A bill for amendments to the General Penal Code, which included racist motivation as an aggravating circumstance, was presented before the Icelandic Parliament in the 2021 spring session.^{lxii} It did not pass.

- The reporting group encourages the Icelandic government to implement as soon as possible a stipulation to the General Penal Code that expressly considers the racist motivation of an offence as a specific aggravating circumstance.

Human Trafficking

Currently there is no action plan against trafficking in human beings in place but in March 2019, the Ministry of Justice issued the government's Emphasis on Actions to Combat Human Trafficking and Other Forms of Exploitation^{lxiii} A positive step has been taken with the establishment of a coordination team run by the reception center Bjarkahlíð for victims of violence and the helpline 112 for trafficking notifications, but further action is needed. In spite of good recommendations by the three task forces created from the large steering group on human trafficking, one with the role of implementing preventive measures, the second on investigation and prosecution, and the third on measures regarding assistance, support and protection, only a few have been implemented.

- The reporting group encourages the Icelandic government to adequately fund actions for combatting human trafficking and to issue a comprehensive action plan on trafficking in human beings. The Icelandic government is encouraged to address the structural conditions which enable and perpetuate human trafficking, which include lack of safe legal routes for refugees and migrants, poverty and massive human rights violations in countries of origin.

ⁱ Ministry Offices, Alþjóðlegir mannréttindasamningar, available at stjornarradid.is/verkefni/mannrettindi-og-jafnretti/mannrettindi/althjodlegir-mannrettindasamningar (accessed on 18 June 2021).

ⁱⁱ Office Of The High Commissioner Of Human Rights, UN Treaty Body Database, tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=78&Lang=EN (accessed on 18 June 2021), "Iceland".

ⁱⁱⁱ Office Of The High Commissioner Of Human Rights, UN Treaty Body Database, tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=78&Lang=EN (accessed on 18 June 2021), "Iceland".

^{iv} Office Of The High Commissioner Of Human Rights, UN Treaty Body Database, tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=78&Lang=EN (accessed on 18 June 2021), "Iceland".

^v Iceland, Tillaga til þingsályktunar um lögfestingu samnings Sameinuðu þjóðanna um réttindi fatlaðs fólks. 2021, althingi.is/altext/149/s/0021.html.

^{vi} Office Of The High Commissioner Of Human Rights, UN Treaty Body Database, tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=78&Lang=EN (accessed on 18 June 2021), "Iceland".

^{vii} UN Human Rights Council, Report of the Working Group on the Universal Periodic Review: Iceland, UN Doc. A/HRC/19/13, Recommendations 115.10-115.19 (Albania, Chile, Brazil, France, Togo, Iraq, Sierra Leone, Argentina, Japan, Mozambique).

^{viii} A/HRC/19/13, Recommendation 117.1 (Finland, Portugal).

^{ix} A/HRC/34/7/Add.1, documents-dds-ny.un.org/doc/UNDOC/GEN/G17/048/89/PDF/G1704889.pdf?OpenElement.

^x Report of the Human Rights Council on its thirty-fourth session, UN Doc. A/HRC/34/2, 14 June 2018, para.542.

^{xi} A/HRC/19/13, Recommendations 117.2-5 (Montenegro, Portugal, Albania, Germany, Czechia.).

^{xii} A/HRC/34/7/Add.1, documents-dds-ny.un.org/doc/UNDOC/GEN/G17/048/89/PDF/G1704889.pdf?OpenElement.



- ^{xiii} Iceland, Tillaga til þingsályktunar um Barnvænt Ísland – framkvæmd barnasáttmála Sameinuðu þjóðanna, 2021, althingi.is/altext/151/s/1702.html.
- ^{xiv} Stjórnlagaráð, The Constitutional Council – General Information, stjornlagarad.is/english (accessed 24 June 2021).
- ^{xv} RUV, “Ný stjórnarskrá ratar á Alþingi í dag”, 21 October 2020, ruv.is/frett/2020/10/21/ny-stjornarskra-ratar-a-althingi-i-dag
- ^{xvi} Iceland, Frumvarp til stjórnskipunarlaganna, 2020-2021, althingi.is/altext/151/s/0787.html.
- ^{xvii} [A/HRC/19/13, Recommendation 61.8 \(Norway\)](http://www.refworld.org/docid/4a6c1d3d.html)
- ^{xviii} Ministry of Justice, Skipað í stýrihóp stjórnarráðsins um mannréttindi, 5 September 2017, stjornarradid.is/efst-a-baugi/frettir/stok-frett/2017/09/05/Skipad-i-styrihop-stjornarradsins-um-mannrettindi-
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- ^{xx} Prime Minister’s Office, Ministry of Justice, Ministry of Social affairs, Sjálfstæð innlend mannréttindastofnun í bígerð, 5 February 2021, stjornarradid.is/efst-a-baugi/frettir/stok-frett/2021/02/05/Sjalfstaed-innlend-mannrettindastofnun-i-bigerd.
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- ^{xxii} Iceland, Lög um jafna meðferð á vinnumarkaði, 2018, althingi.is/lagas/nuna/2018086.html.
- ^{xxiii} Icelandic government, Government Consultation Database: Open Government Consultation with the Government, [samradsgatt.island.is/oll-mal/\\$Cases/Details/?id=2926](http://samradsgatt.island.is/oll-mal/$Cases/Details/?id=2926) (accessed 23 June 2021), “Sækja skjal”.
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- ^{xxvii} National Commission, University of Iceland and others, *Vinnumenning og kynjatengsl innan lögreglunnar*, 2013, dev.logreglan.is/wp-content/uploads/2014/12/Vinnumenning-og-kynjatengsl-l%C3%B6greglunnar-%C3%BAtg.-2013.pdf, p. 11 and 61.
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- ^{xxix} Ministry Office, Aðgerðir gegn ofbeldi, stjornarradid.is/verkefni/almannaoruggi/adgerdir-gegn-brotastarfsemi/adgerdir-gegn-ofbeldi (accessed 24 June 2021).
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