Ninth Consultation

on the Implementation of the

Convention and Recommendation against Discrimination in Education (1960)

National report

NORWAY

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Introduction
Norway is a State Party to the UNESCO 1960 Convention and Recommendations against Discrimination in Education. The Convention was ratified in 1963. UNESCO’s 1960 convention on its own is not specifically incorporated into national legislation.

Summary of main initiatives related to the Convention
For the reporting period (2012 – 2016) these main issues are highlighted in the report
- Incorporation of equality and non-discrimination in the Constitution of Norway
- Adoption of four equality and anti-discrimination acts
- Implementation of inclusive policies in kindergartens and basic education addressing social-pedagogical measures, professional support, financing and technical provisions
- A public committee to study legislation, measures and schemes for the Sami language including its relation to the Education Act. The final report to be presented in September 2016.
- An Action Plan against Antisemitism to be launched in October 2016
- Follow-up on a public committee report "Assimilation and Resistance" on Romani People/tater
- Initiatives to reduce drop-out at upper secondary level
- Reduction of bullying in schools and launching of new policies creating "Partnership against bullying".
- Initiatives to increase basic competencies among adults
- Special measures concerning immigrants responding to large increase in 2015

Revision of relevant legal instruments
The Convention has been made directly applicable by incorporation in Norwegian domestic legal instruments.

By the Storting (Norwegian parliament) decision of 13 May 2014, the Constitution of Norway was supplemented with a number of human rights provisions. The principles of equality and non-discrimination were incorporated into Article 98 of the Constitution with the following wording:
"All people are equal under the law.
No human being must be subject to unfair or disproportionate differential treatment."

"Anti-discrimination legislation" - General
In 2013, the Norwegian Parliament (the Storting) adopted four new equality and anti-discrimination acts, which entered into force 1 January 2014. These were the Gender Equality Act (gender), the Anti-Discrimination and Accessibility Act (disability), the Ethnicity Anti-Discrimination Act (ethnicity, religion and belief) and the Sexual Orientation Anti-Discrimination Act (sexual orientation, gender identity and gender expression). The acts cover all spheres of society, including education.

The Sexual Orientation Discrimination Act was firstly enacted in 2013, prohibiting discrimination and harassment in all areas of society on the basis of gender identity and gender expression as well as on sexual orientation. Until 2013, discrimination and harassment on the basis of sexual orientation was prohibited only in the workplace through the Working Environment Act. The anti-discrimination acts on gender, disability and ethnicity are largely a continuation of provisions laid down in the former acts on discrimination of 1978, 2005 and
2008. The changes are primarily technical or matters of wording. The aim was to harmonize and simplify the legislation.

The Government aims to improve the protection against discrimination for everyone, and intends therefore to propose a comprehensive equality and anti-discrimination act. A proposal for a comprehensive new equality and anti-discrimination act was distributed widely for comment in October 2015, with a reply deadline in January 2016. The proposal calls for replacing the four existing gender equality and anti-discrimination acts with a new consolidated act. Today’s protection is scattered across several acts, and has been criticized for being fragmented. The acts also provide different sorts of protection depending on the basis of the discrimination and its social context.

The Government aims to propose the comprehensive equality and anti-discrimination act to the Norwegian Parliament (the Storting) in spring 2017.

A comprehensive statute will provide clearer, more coherent protection against discrimination, regardless of the discriminatory grounds and social context, and will thus be a more effective tool. Consolidated legislation will also simplify the way regulations are applied, make the statute more understandable, and open the way for more consistency in enforcement and judicial practice. Essentially, the protections are to be equal no matter the discriminatory grounds. The statute must nevertheless take into account the special characteristics of certain types of discrimination. The protection against discrimination due to pregnancy and the rules on universal design and individual accommodation for persons with disabilities are cases in point.

As regards education, the Government has proposed that both teaching and learning materials shall be based on the principle of equality and non-discrimination. Today, the Gender Equality Act states that learning materials shall be based on gender equality. According to the proposal, the provision will be expanded to all discrimination grounds, and will include oral teaching as well as printed learning materials.

In addition, several conventions dealing with human rights are incorporated in the Norwegian Act of Human Rights. The Act is incorporating several conventions:


- International Covenant on Economic, Social and Cultural Rights,
- International Covenant on Civil and Political rights (including Optional Protocol to the International Covenant on Civil and Political Rights, Second optional Protocol to the International Covenant on Civil and Political Rights, Aiming at the Abolition of the Death Penalty)
- Convention on the Elimination of All Forms of Discrimination against Women (including Optional Protocol to the Convention on the Elimination of All Forms of Discrimination against Women)
According to the Act against discrimination on the basis of disability (Anti-discrimination and Accessibility Act), children with disabilities shall have a right to suitable individual adaptation in municipal day care facilities to ensure equal development and activity opportunities (art.16). Pupils and students with disabilities who attend a school or educational institution shall have a right to suitable individual adaption of the place of learning, teaching, teaching aids and examinations to ensure equal training and education opportunities (art. 17).

The provisions of the Convention can be invoked before and given effect to by the courts of justice. The state authorities are often asked to interpret the conventions. As an example, the Ministry of Education and Research has received questions on whether it implies religious discrimination to forbid pupils to carry religious symbols in schools, and questions concerning the children of asylum seekers and their right to access to education in Norway.

Another alternative to court proceedings in cases of discrimination is the system with ombudsmen. In Norway we have two kinds of relevant ombudsmen: The Parliamentary Ombudsman and The equality and anti-discrimination Ombudsman. In addition to be an alternative to court proceedings in cases of discrimination, the ombudsman is a low threshold option that is easily accessible.

Norway’s approach to the ninth periodical reporting

Major principles and values reflected in the 1960 Convention are similar to fundamental values in the Norwegian welfare state underpinning the integration and social inclusion policies.

A well-educated population is the greatest asset of every nation. The education system lays the foundation for social integration and economic growth and is vital to the development of a democratic and unified society. Education is also the individual right of every human being and shall ensure personal growth and intellectual development.

It is a great challenge to any education and training system to facilitate learning and optimal realisation of both individual and social potentials. This is particularly so in a context of constant change and high levels of migration, where education and training needs are changing and become increasingly diversified. The Norwegian government has chosen to address this challenge by means of inclusive education. Equal opportunities and non-discrimination are basic principles and aims in terms of access, stable attendance and learning. The education system is meant to give equal access to and accommodate optimal learning for all individuals, and contribute to reduced social inequalities.

Many different measures have been implemented with the aim to promote equity and equality in result. They target specific vulnerable or under-privileged groups and individuals. Above compulsory education, merit is the only relevant factor to regulate progress to higher education levels and specialized studies. Norway has participated in earlier periodic consultations on the implementation of the 1960-Convention and Recommendation. A full report was submitted in the eighth consultation round, in March 2012. A comprehensive national system of legal and policy instruments was then in place, and described in the report.
The Reporting Guidelines state that: “Member States do not necessarily have to answer all the questions..(and may).. refer to it (report in the seventh consultation round) when appropriate”(p 2).

Accordingly, this 9th report will be an updated version of the last report on the 1960 Convention and Recommendations.

Definitions
This report applies the definitions of “discrimination” and “education” as outlined in the 1960 Recommendation against discrimination in education:

“1. .. the term ‘discrimination’ includes any distinction, exclusion, limitation or preference which, being based on race, colour, sex, language, religion, political or other opinion, national or social origin, economic condition or birth, has the purpose or effect of nullifying or impairing equality of treatment in education and in particular:

(a) Of depriving any person or group of persons of access to Education of any type or at any level;
(b) Of limiting any person or group of persons to education of an inferior standard;
(c) Subject to the provisions of section II of this Recommendation, of establishing or maintaining separate educational systems or institutions for persons or groups of persons; or
(d) Of inflicting on any person or group of persons conditions which are incompatible with the dignity of man.

2. .. the term ‘education’ refers to all types and levels of education, and includes access to education, the standard and quality of education, and the conditions under which it is given.”

Norwegian education and training in brief

The system
Norway has a comprehensive public education system, covering all levels from Kindergarten to higher education, and including vocational education and training, as well as adult education. Whereas all public education from primary education and upwards is delivered free of entrance and tuition fees, parents have to pay a fee for children in Kindergarten.

*Pre-primary education (age 0 to 5)*
Early Childhood Education and Care (ECEC) is a non-obligatory part of the education system in Norway. ECEC is provided by kindergartens. These are pedagogical institutions that cater for children from 0 to 5 years of age. Some 50 % of the kindergartens are privately owned and operated with public support, based on formal approval by the authorities. Since 2009 all children, irrespective of their background, have a legal right to a place in kindergarten from 1 year of age.

Nearly all children in Norway have been to Kindergarten before entering primary school. The participation rate for all four and five year olds is 97 %. A high proportion of children less than 3 years of age also have a place in a kindergarten. However, for minority language

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2 The Kindergarten Act states that children, who reach the age of one no later than by the end of October in the year a kindergarten place has been sought, are upon application, entitled to a place in a kindergarten in accordance with this act with regulations.
speaking children, participation rates are lower than for the age cohort as a whole. This also holds true for the four and five year olds, but the gap is more evident for younger minority children. 93.3% of minority languages speaking 5 year olds now attend kindergarten before entering school. However participation rates for minority languages speaking children have increased also for the youngest children. Participation of minority languages speaking children aged 1-2 years has gone up from 25% in 2005 to 58% in 2015.

Primary and secondary education including vocational training (6 – 19 years)
Mainstream, basic education in Norway is 7 + 3 + 3 years – primary, lower secondary and upper secondary education and training – of which the first ten years are compulsory. It has a centralised framework with national curricula, financing and quality control. But the delivery of education and training is decentralised to a high number of providers. The vast majority of students are enrolled in public education institutions. Both public and private providers of national education and training receive financial support from the government. They are subjected to national quality control and are obliged to organize examination and assessment according to national guidelines.

Entrants to upper secondary level can choose between 12 alternative education programs. Three of them prepare primarily for further academic studies, whereas the other nine programs have a vocational orientation.

Vocational Education and Training (VET), including apprenticeship, is a fully integrated part of upper secondary education and training. In general, upper secondary VET includes two years of school-based education with practical training in school workshops and short work placements in industry, followed by two years of formalised apprenticeship training and productive work in an enterprise or public institution. The training enterprises receive financial support throughout the apprenticeship period. National curricula in upper secondary VET cover the school-based as well as the apprenticeship part of the training programs. The apprenticeship is finalised with a (mainly) practical examination for the Trade certificate.

Tertiary education (universities and university colleges)
There are requirements for education/practice and specific subjects, and there are several ways to enter higher education. Acceptance to higher education requires for example fulfilled three years of upper secondary school with general university admissions certification. This is awarded non-vocational students or vocational students who choose to not take their apprenticeship. Conversely study competence can be achieved by the so-called 23/5 rule where applicants must be 23 years of age and have a total of five years of upper secondary education and work experience as well as have passed courses in Norwegian, English, mathematics, science, social studies. To be accepted as certain lines (for instance engineering) advanced courses in mathematics, physics and chemistry must be passed. Admittance to Bachelor level programs is coordinated through the Norwegian Universities and Colleges Admission Service based on a point scale, with the highest ranking students offered a place. Points are awarded based on average grades from upper secondary school, but additional points are awarded students with secondary two-year course specialization, science specialization, age and fulfilled one year of higher education, military service or folk high school. Secondary school grades can be improved to increase points, but many of the places are only offered based on original transcripts without age or study points.
A student at a university or a university college can get scholarships and/or loans from the The State Educational Loan Fund. A student welfare organization shall, in cooperation with education institutions, offer student welfare, such as student housing.
Adult education
National investments in updating and further education for adults are significant. Adults have a statutory right to primary and secondary education and training, free of charge, delivered by the municipalities and counties, respectively. The social partners cooperate closely with the government to ensure that relevant Life-Long Learning (LLL) opportunities are available.

Around one quarter of the adult population participates in various types of work-related updating and further education and training annually. Universities and other higher education institutions, as well as a high number of non-profit and commercial providers deliver education according to national curricula on secondary and tertiary levels, as well as work and personally oriented courses. Full-time, part-time and evening courses, and internet-based teaching, are available to ensure flexible options.

Recognition of prior learning
All adults have the right to get their knowledge and skills acquired through work experience, non-formal and informal learning, evaluated and validated. The validation process often leads to a partial or complete certificate of upper secondary education and training.

Provision of adult training often requires adaptation to the needs of the learner. If the results of the validation procedure shows that an adult needs only parts of a particular subject to achieve a formal qualification, the local authorities are in principle obliged to provide the learner with precisely that training. This is currently not always feasible, but several projects are exploring the possibilities of creating more flexible provisions than those available today.

Major features of Norwegian education and training
In Norway, education is rights-based from the age of one. Every person is entitled to get the opportunity and necessary support to identify and develop her/his talents to the full potential, including theoretical, practical, cultural and social aspects. It is furthermore the responsibility of the education system to provide the various sectors of society with qualified, critical and constructive individuals that will actively support and contribute to the maintenance and further development of the economy and democratic welfare society.

The Kindergarten Act states that the institutions in their daily operation shall take account of children’s age, level of functioning, gender, and social, ethnic, and cultural background, including the language and culture of Sami children (Section 2 – 4).

The Education Act states that teaching shall be adapted to the abilities and aptitudes of the individual pupils and apprentices. Emphasis shall be placed on constructive cooperation between teachers and pupils, between the school and the home, between the school and the workplace, and between apprentices and companies. All persons associated with school or with training establishments: “... shall make efforts to ensure that pupils and apprentices are not injured or exposed to offensive words or deeds”.

Education is considered a national, public responsibility and the education and training policy is shaped in the interface between cultural, economic and social distribution policies. Vocational education and training (VET) is strongly emphasized in mainstream education, as well as in a broader “Life-Long Learning” (LLL) perspective. Formulation of education and training policy, as well as the implementation of VET always include a wide variety of stakeholders in civil society, including enterprises.
All residents are to be ensured equal rights of access to quality education, irrespective of
gender and economic, social, geographic and cultural background. Accordingly:

- Education from primary and onwards in the public domain, including higher
  education, is supplied free of charge; costs are covered by public budgets;\(^3\)
- Every person that has completed ten years of compulsory education is entitled by law
to three years of upper secondary general education or VET, by her or his own choice;
- The supply of education and training should be of high quality and broad enough to
allow for a range of choices irrespective of geographical location and social factors;

Education is regarded a means for promoting equity and reduce inequalities in society. Thus:
“When social inequality increases, efforts to combat the differences must be intensified in the
education system.”\(^4\)

**Administration and delivery**
The Ministry of Education and Research (MOER) has overall responsibility for national
policy development and administration of early childhood education and care (ECEC),
mainstream education and vocational training at all levels. Administrative responsibilities are
mandated to the two government agencies, Directorate for Education and Training (UDIR)
and Norwegian Agency for Quality Assurance in Education (NOKUT).

The 428 municipalities are responsible for organising the ECEC as well as primary and lower
secondary education. Upper secondary general education (GE) and VET is the responsibility
of the 19 counties. Both levels cater for both young people and adults. Kindergartens are
owned either by the municipalities or different private entities, parents, volunteer
organisations etc. Public schools are owned and run by the municipalities and counties,
respectively, but the costs are covered by the central government.\(^5\) Both municipal and private
kindergartens are publicly funded. Public funding covers 86\% of the running costs, the rest
is covered by parents (13.8\%). Both counties and municipalities report directly to the national
level. A County Governor represents the government in each county. The County Governor’s
education office monitors and guides the kindergartens, as well as the delivery and results of
compulsory and upper secondary GE and VET, including adult education. UDIR is
responsible for the implementation of national policies at the levels of kindergarten, primary
and secondary education and training, including the development of curricula, national
examinations and quality control.

Public-private partnerships (PPPs) constitute the backbone of upper secondary VET.
Employers’ organizations and trade unions, individual companies and public institutions are
major contributors to policy formation, curriculum development and operation of the system
at national, county and local levels. Social partner organisations and the industry hold the
majority of seats in all the most influential bodies at national and county level. At local level,
Training Offices owned by local enterprises and institutions recruit and supervise training
enterprises during apprenticeship on behalf of the county authorities. They often provide
training for company instructors and vocational theory classes to apprentices.

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\(^3\) Children in kindergartens and pupils in private institutions pay a tuition fee.

\(^4\) St. meld. nr. 16 (2006-07)

\(^5\) Municipalities and counties receive a block grant from the government. Schools do not receive funding directly
from the government.
Public higher education institutions are owned by and organised directly under MOER and financed over its budget, but they have a high degree of professional and economic autonomy.

Some 12 – 15 % of students in higher education attend private institutions. Most of these receive financial support from MOER provided they meet professional requirements and deliver study programs that comply with national requirements. Approval and quality control of public and private institutions, programs and achievements is conducted by the autonomous agency NOKUT).

Measures to Enhance Inclusive Education - Overview

Inclusive education has for decades been a central policy principle and goal. Inclusion is the basic principle and goal of the government’s educational policy and targets private and public kindergartens, public schools and private schools with state funded support. This means that children from different backgrounds and with different needs and abilities come together in the same kindergartens and common schools of high quality, and that each child is met with high expectations, which can be adapted to the circumstances and abilities of each child.

Regulations such as the Kindergarten Act and the Framework Plan for the content and Tasks of Kindergartens apply to all kindergartens regardless of ownership. The Purpose clause in the Kindergarten Act states that "The kindergarten shall promote democracy and equality and counteract all forms of discrimination" (Section 1). Kindergartens shall "help to ensure social equality" and must strive to promote "gender equality in their educational practice. In their daily operation the institutions shall take account of children’s age, level of functioning, gender, and social, ethnic, and cultural background, including the language and culture of Sami children (Section 2 – 4).

Children with disabilities are entitled to priority for admission to kindergarten. Children who are subject to an administrative decision of the Child Welfare Service Act, are also entitled to priority admission. 2.7 % of children in Kindergarten receives special pedagogical support in accordance with regulation in the Education Act. The Government recently proposed a bill that was passed in the Parliament regarding special pedagogical support. The Parliament decided to transfer the enactment of the right to special pedagogical assistance for children before school age from the Education Act to the Kindergarten Act. A majority of children now attend Kindergartens. The transfer is done to make the legislation more accessible and to have better coherence in regulations on the pedagogical provision for young children. The purpose of special pedagogical assistance is to provide children with early support in their development of eg. language and social skills. The right to special pedagogical assistance applies regardless of whether the child attend kindergarten or not. The new regulation establishes that municipalities have the duty to ensure that children with disabilities receive appropriate provision. Parents are given the right to appeal to the County Governor.

According to the Education Act, Education shall be adapted to the abilities and aptitudes of the individual pupil, apprentice and training candidate (Education Act 1-3).

Primary and lower secondary school pupils have the right to attend the school that is closest to where they live or the school designated for the catchment area where they live. (Education Act)
The pupils may be divided into groups as necessary. The groups must not be larger than is justifiable in relation to pedagogy and security. The organisation shall safeguard the pupils’ need for social belonging. Pupils shall not normally be organised according to level of ability, gender or ethnic affiliation. (Education Act)

The operational understanding of and approach to inclusive education is that every individual shall be provided optimal learning conditions in the regular learning context – as far as possible. Only in exceptional cases students should receive instruction outside the regular learning context.

7.9 percent of all pupils in primary and lower secondary education and training requires special needs education (2015-16). The extent is highest in the 10th grade with 11.6%, and lowest in the first grade with 3.8 percent. Of the pupils requiring special needs education, 52 percent receive between one and seven hours a week. 44 percent of the students requiring special needs education get this mainly in groups of two to five pupils within the school, 9 percent get it in groups of six or more. 35 percent get it in the regular class environment. The gender distribution in special needs education has remained stable for a long time, with boys accounting for around 69%.

A number of specific measures that support and promote Inclusive Education are in operation, adapted to the various types of education and target groups. The arrangements fall in four major categories:

Social-pedagogical, including:
- Each municipality and county authority shall provide an educational and psychological counselling service (PPT). The service has a double mandate. It is responsible for producing expert assessments where the law demands it, both in respect of school pupils and children under compulsory school age. The service also has a statutory responsibility for contributing towards the development of competencies and organisational development in kindergartens and schools (Kindergarten Act, Education Act).
- Social and vocational counselling services at institutional level.
- Needs-based priority entrance to kindergartens and statutory right to a place from 1 year of age.
- Needs-based priority entrance to upper secondary school.
- Follow-up service for dropouts and non-attendants at upper secondary level.
- The National Support System for Special Needs Education (Statped) is managed by the Norwegian Directorate for Education and Training. Statped assists local authorities and provides special teaching services at individual and system level in areas in which the country’s all local authorities do not have sufficient competence.

Professional, including:
- Formal involvement of parents, cooperation kindergarten – home, school – home.
- Homework support arrangements.
- Deviating education paths and assessment arrangements.
- Entrance to higher education based on assessment of formal education and work experience.
- System for validation of non-formal and informal learning outcomes.
- “Second chance” arrangements for early school leavers.
Financial, including:

- Subsidised loans and grants to learners in upper secondary and higher education, organised through the State Education Loan Fund.
- Financial support through various arrangements to families with weak economy.
- Tax relief to companies that invest in education of staff.
- Subsidised adult education arrangements.

Technical, including:

- Free provision of necessary technical equipment to learners with specific needs.
- Free transport to schools.
- Physical adaptation of all education institutions to ensure universal access.

Experience shows that the national framework of Norwegian education and training, including policy, strategies, regulations, funding and administrative arrangements, to a large extent is in compliance with major inclusive education principles. However, some weaknesses and challenges have been identified as regards the practical implementation of inclusive education principles and goals:

The quality of Norwegian kindergartens is high and the ECEC attendance is far above most other OECD countries, especially for the younger age-groups. The importance of early Norwegian language stimulation and social and emotional preparation for a satisfactory transition to compulsory education is well documented. Despite recent developments with an increase in the number and coverage of qualified kindergarten teachers and assistants with formal qualification in ECEC, in some regions there is still a shortage of qualified kindergarten teachers. There are still some children that are not enrolled in kindergarten and hence are excluded from this benefit. It is particularly worrying that many children from immigrant families do not attend despite financial stimulation arrangements such as reduced parental fees (set to a maximum of 6% of family income, capped at 280 EUR/month) or free 20 hour core time/week for 3, 4 and 5 year old children in families with low income.

In general, institutions and teachers succeed in establishing and maintaining a positive social environment. Schools and teachers in general provide adapted instruction, but there are indications that there is a potential for improvements, e.g. by strengthening the social-pedagogical training of teachers. The National Support System for Special Needs Education represents an important resource and could possibly be used more efficiently.

The Government has proposed that the duty to ensure universal design of ICT (information and communications technology) shall also apply to the education sector. Today, the duty to ensure universal design of ICT does not apply to this sector. Children with disabilities have the right to equal opportunities for education as other pupils and students. Therefore, web-based solutions such as schools' websites and digital learning platforms should be accessible to all.

The Norwegian Government's aim is equal access to higher education. The act relating to universities and university colleges is to ensure that students have equal rights for admission to higher education, and that universities and university colleges facilitate this happening. A student at a university or a university college can get scholarships and/or loans from the
State Educational Loan Fund. A student welfare organization shall, in cooperation with education institutions, offer student welfare, such as student housing. The responsibility for the learning environment, including prevent discrimination, is subject to universities and university colleges. This responsibility also includes questions about individual adaptation of the examination. The institution shall, as far it is possible and reasonable, arrange for students with special needs. Facilitation must not lead to a reduction of the academic requirements of each program according to the act relating to universities and university colleges. The government has a goal that higher education should be organized so that all students, even those who are in need of adjustment during the study, may be admitted to and implement education. Today there are a number of statutory instruments that could help the students get a study and examination situation that is tailored to the individual student's needs. A keyword here is cooperation between the student and the institution of good and appropriate solutions. This collaboration will ensure the academic requirements of the examination while the student receives a reasonable degree of facilitation. A plan of study could help to protect students' rights in this respect, since such a plan would raise awareness to institutions of their responsibility to facilitate the situation of those who have special needs. According to the act relating to universities and university colleges there shall also be a learning sample at the institution to contribute to students' learning environment is safeguarded.

State (public) universities and university colleges may not charge fees from students neither for regular courses leading to a degree nor for professional training courses. A small fee has to be paid each semester to the student welfare organization.

Private universities and university colleges shall ensure that the state operating grant and fees from the students are used to the benefit of the students. Institutions receiving state funding may not give financial dividends or in any other manner transfer profit to the owner or close associates of the owner.

The State Educational Loan Fund allocates grants and loans to pupils and students according to an official cost of living estimate, stipulated annually. The support is meant to cover expenses for accommodation, subsistence costs and study materials. Means testing of the parents’ economy was disbanded in the early 1970s. There are special arrangements for maternity leave, illness and students with children. The size of the grant also depends on the income of the student and the income of spouse or cohabitant.

Loans are interest free during the studies. In cases of low income, unemployment, illness, childbirth or care of small children, repayments may be postponed for a period and the interest can be waived. All, or parts of the loan, may also be cancelled if illness prevents the person from working.

**Issues and targeted measures**

The overall goal for the inclusion policies is that each person shall have equal opportunities to participate in society.

**Measures targeting persons with disabilities/impairments**

In primary and lower secondary education and training, the proportion of pupils requiring special needs education has been reduced recent years, from 8.4 percent of all pupils in the school year 2010-11 to 7.9 percent in 2015-2016. The extent is at its highest in the 10th grade with 10 percent, and lowest in the first grade with 3.8 percent. 2.7 % of children in
kindergarten receives special pedagogical assistance in accordance with the Education Act. The gender distribution in special needs education has remained stable for a long time, with boys accounting for around 70 percent.

The latest national endeavor to ensure full access to quality education and training for persons with disabilities/impairments is the White Paper/Report to the Storting entitled “Learning together”. In spite of national policies, the educational level of young persons with disabilities is significantly lower than in the population as a whole: 30% and 38% of all young people in the age group 20-35, respectively, have attained higher education.

Initiative to reduce drop-out at upper secondary level

National and international tests show that too many Norwegian pupils in basic education do not perform at the level of national ambitions and expectations, and fail to acquire the necessary basic skills at an early stage. Thus, too many pupils with weak school results are complete compulsory school. They face problems and risk dropout when entering upper secondary education and training. Since linguistic minority students tend to score lower than linguistic majority students, and students with highly educated parents tend to get better results in basic education than learners who have parents with little education, some argue that the education system to some degree contributes to reproducing social inequalities.

Drop-out in upper secondary education

Research shows that low motivation and low achievement in compulsory education is one of the main reasons for pupils dropping out of upper secondary school in Norway. It is thus crucial to improve the quality of the entire school system, and especially the early stages of education. The issue is presently receiving general attention and is discussed in a White Paper (Report to the Storting) which suggests taking steps to increase practical approaches and other motivational elements at both lower and secondary levels.

“Ny GIV” - New possibilities - initiative is the largest initiative in recent years aiming to reduce dropouts and increase the successful completion of upper secondary education and training. This national project is implemented by MOER in collaboration with local municipalities. Included in “Ny GIV” is the so-called Transition project, which focuses on a robust and sturdy follow-up of pupils with the poorest results in the final part of tenth grade of lower secondary school, as well as in upper secondary education and training.

Fighting bullying and harassment in kindergartens and schools

Despite several measures to combat bullying, and despite increased political and social attention to this topic, figures related to bullying in schools have remained fairly stable in the period 2004 to 2012. However, the National Pupil Survey for the last three years (2013-2015) indicates that fewer students are bullied, i.e. that efforts made during the recent years are now starting to pay off. However, the survey has been altered since 2012, and the decrease in pupils who report that they are bullied can be due to changes in the questionnaire. Kindergartens do not have a National Pupil Survey, but several research projects indicates that bullying and exclusion also occurs in kindergartens.

All sorts of negative behavior, like bullying and discrimination, affect children’s learning processes in a negative way. Research shows that a safe, inclusive and healthy learning environment does not only increase learning in itself, but can also contribute to decrease the significance of social background for the learning outcome of children. Schools and kindergartens thus need to work continuously to ensure a good learning environment.
It is important that teachers and other school personnel are aware of signs indicating exposure to discrimination or bullying. They need to know how to handle individual incidents themselves, and know where to turn for assistance if additional efforts are considered necessary. A new subject, called Pedagogies and student knowledge, has therefore been included in training programs for teachers, principals and education management.

Over the last ten years, the education authorities have provided approx. 40 mill NOK a year in support of various anti-bullying and learning environment programs. A national “Better learning environment” campaign is an ongoing national, five-year effort to this end. A web-based guide and extensive guidance materials have been developed for schools, municipalities and counties in their efforts to ensure the pupils’ right to a good physical and psychosocial learning environment. The Directorate for Education and Training have developed guidance material "Children's well-being – adults' responsibility. Preventing bullying starts in kindergarten" aimed at supporting staff in developing inclusive practices and a good psychosocial environment in close cooperation with parents. The material is made available in a number of languages.

In 2013 the Ministry of Education and Research constituted a committee to report on bullying and learning environment in schools. The committee submitted the Official Norwegian report NOU 2015:2 Å høre til. Virkemidler for et trygt psykososialt skolemiljø, in march 2015. The report contains a thorough investigation into the research on conditions for, and prevention of, bullying, as well as over a hundred suggestions for different measures for the government. The report also undertook a review of chapter 9a in the Education Act and suggested a number of changes in the regulations concerning school environment.

In 2016 the government launched the future policies in the fight against bullying in Norwegian schools and kindergartens. It is important to note that kindergartens is a part of the strategy. 91% of Norwegian children participate in kindergarten, and therefore it is an important arena for aiding the development of good social skills and early intervention against bullying.

The strategy consists of measures in three areas. The areas are better knowledge in schools and kindergartens on how to prevent, uncover and stop bullying, better support and guidance, especially for children and their parents, and a better legal framework.

A new “Partnership against bullying”, covering the period 2016 – 2020, was recently signed by the Norwegian Prime Minister, the Minister of Education and several other partners. Within the framework of this binding partnership for good, inclusive childhood and learning environments from kindergarten through upper secondary school, the government has launched several measures to combat bullying at local and school levels.

**Measures to fight anti-Semitism and racial discrimination**

In the spring of 2010, Norwegian media reported on harassment of Jewish schoolchildren in schools in Oslo. The Minister of Education and Research appointed a working group mandated to advise on schools’ work against anti-Semitism, racism and discrimination. Based on recommendations in the working group’s report, a training program addressing discrimination, anti-Semitism, racism and undemocratic attitudes and behavior was developed.
DEMBRA (Democratic Readiness against anti-Semitism and Racism) has been a three year pilot program (2013-15) funded by the Norwegian Ministry of Education and Science. The program involves 5 schools each semester, 30 schools in total. The Norwegian project has been designed to prepare and enable young people to live as democratic citizens in diverse societies is also to prevent racism, anti-Semitism and other forms of discrimination.

It has been a project developed by the European Wergeland Center in cooperation with the Center for Studies of the Holocaust and Religious Minorities and The University of Oslo, aimed primary at school heads and teachers in lower secondary schools in Norway. DEMBRA combines the expertise of all parties in a program based on a whole school approach where theory meets practice, reflection meets action and history meets the future.

During the program, teams of school heads and teachers has meet for three days of workshops and online cooperation, while all teachers at participating schools has been taken part in three half-day seminars on such topics as group-based enmity and prevention of discrimination. Building on a needs analysis in the beginning of the project, the schools have engaged in class room related activities, such as reflecting on prejudiced language to create an awareness of mechanisms of exclusion and hate speech and have organized activities involving the whole school, aiming to challenge and counteract prejudices and to build inclusive school cultures.

In 2016 DEMBRA will be continued and expanded to reach schools outside the Oslo region.

**Action Plan for Gender Equality**

The latest Norwegian government’s general action plan for gender equality was launched in November 2011. It runs from 2011 to 2014 and contains 86 new policy initiatives/measures. The plan addresses gender equality in all areas of society and is the first Norwegian general action plan for gender equality in 20 years. Traditional gender choices of education and occupation are among the main causes of systematic differences between women and men at the workplace and otherwise in society. The action plan aims to ensure that Kindergarten, and primary and secondary education is conducive to an equitable society, and that all pedagogical activities in Kindergarten and in the school are organized accordingly.

**Financial support of students with special needs**

The Norwegian student support system has mainstreaming as its major feature, providing basic loans and grants to all resident students in higher education through the State Education Loan Fund. Special grants are provided for students who fall ill or have children. During recent years, the system has been extended with special schemes for disabled students. These schemes allow additional grants, support during the summer months and additional coverage when the disability causes delays in study progress.

Pupils in upper secondary education and training may be eligible for grants from the State Educational Loan Fund. The grant is means-tested and is provided to a minority of pupils, especially from low-income, one-parent households.

**Measures to encourage, facilitate and support Adult Learning**

*Basic Competence in Working Life (BCWL)*

Two large OECD surveys on basic skills in the adult population gave Norway a high score compared to other countries. Nevertheless, estimates say that still some 400 000 adults lack the level of basic skills they need to be completely functional in society and in the work force.
In response to these challenges the Norwegian government in 2006 established a national program called Basic Competence in Working Life, BCWL. Vox, the Norwegian Agency for Lifelong Learning was given the responsibility for developing and implementing the program, which concentrates on reading, writing, numeracy, and digital skills. Courses are organized at the workplace, in close collaboration with the enterprise. Courses have also been organized for unemployed people, on assignment by NAV, the Norwegian Labour and Welfare Service.

The aim of the program is to give adults the opportunity to acquire the basic skills they need to keep up with the demands and changes in modern working life and civil society. Funding and participation have increased every year since the program was established in 2006. At present, the number of participants exceeds 47 000.

The program concentrates on reading, writing, numeracy, and digital skills. Courses in Norwegian language was added to the program in 2016. Any enterprise in Norway, private and public, can apply for funding from the program, and the voluntary sector was incorporated in the scheme in 2016. The aim was to offer education to low skilled persons outside the labour market.

The following criteria have been applied:

- The learning activity should be combined with work or daily life activities, and basic skills training should preferably be linked to other job-relevant learning.
- The courses should strengthen the participants’ motivation for further learning.
- The courses have to comply with the competence goals expressed in the Framework for Basic Skills, developed by Vox and approved by the MOER.

Special efforts are made to include SMEs in the program and to encourage applications from industries which employ people with relatively low formal skills.

Even if the BCWL courses are adapted to the needs of a particular company or branch, the aims of courses go beyond improving participants’ employability and the efficiency and results of the company: Social inclusion, increased self-esteem and improved general welfare for adults at risk are equally recognized and promoted.

Most of the projects financed by the BCWL contain an information and motivation phase in which the companies cooperate with the assigned training provider in screening and mapping the actual training needs, informing and motivating potential participants, and adapting the course materials to the concrete environment and activities of the individual work place.

A data base has been established in order to supply up-to-date reports on the progress of the program. The data base also includes detailed information on participants (gender, formal education, industry etc). This makes it possible to monitor the program achievements, to ascertain whether it reaches the intended target groups, and to evaluate the long term impact.

The Framework for Basic Skills

All training in the BCWL program must be based on the national Framework for Basic Skills, which contains competence goals for reading and writing, mathematics, digital competence and oral communication. It also contains teacher guidelines, professional development systems, tests and tools.
The standards descriptions for each of the basic skills have three levels. Each level is described in terms of intended learning outcomes. The competence goals are primarily meant to be a tool for the teacher, who can contextualize the different goals to the individual workplace. A handbook has been produced to further assist the teacher in this process.

Recognizing the fact that quality of provision is to a great extent linked to the quality of the teachers operating at the workplace, Vox has developed and organizes further training for this group. A credit giving course has since 2009/2010 been delivered in cooperation with teacher training institutes. Vox also organizes series of one-day seminars for training providers, focusing on methodology and practical application of the competence goals.

**Challenges and targeted measures relating to specific groups**

**Sami indigenous people of Norway**
Throughout history, the Sami indigenous people of Norway have been victims of discrimination and extensive assimilation policies by the Norwegian authorities. In recent decades, the Sami rights in Norway have gradually been recognized in legislation. Pursuant to the Sami Act, the Sami and Norwegian languages are languages of equal worth. They shall be accorded equal status pursuant to the provisions of chapter 3 of the Sami Act. Some of the provisions are limited to the administrative district for Sami languages, others do not have such geographic limitations. The Act states that the Sami languages may be used in official contexts, and that official information must be adapted for the Sami population. However, challenges arise in connection with the practical implementation of language rights. In 2009, the Government presented an Action Plan for the Sami Languages. The Action Plan includes measures to strengthen tuition in the Sami languages in day-care institutions and in primary and secondary schools. Sami pupils keep their educational rights also if they transfer between one school and another, and if they live outside areas with large Sami population groups.

The Government appointed a public committee to study legislation, measures and schemes for the Sami languages in September 2014. Among other things, the committee will look at the Education Act provisions on education in the Sami languages. The committee's final report will be presented on September 8, 2016.

The municipalities are responsible for ensuring that kindergartens for Sami children in Sami districts are based on the Sami language and culture. In other municipalities steps shall be taken to enable Sami children to secure and develop their language and their culture. As reflected in the white paper to the Sami Parliament on kindergartens for Sami children in 2012, recruiting kindergarten staff with Sami competence is a persistent challenge. Measures were proposed to amend this as well as developing educational materials to support good practice. The Directorate for Education and Training will have a role in following up relevant strategies put in place in collaboration between the Sami Parliament and the Ministry of Education and Research.

**National minorities in Norway**
Groups with a long-standing attachment to the country are defined as national minorities, in accordance with the Council of Europe's Framework Convention for the Protection of National Minorities. In Norway, these minorities are Kvens/Norwegian Finns (people of Finnish descent in Northern Norway), Jews, Forest Finns, Roma and Romani people/Tater (Travellers). The groups are quite varied in regards their interests, needs and access to the educational system.
There are approximately 1500 Jews in Norway. Reports have shown that Jewish school children are particularly vulnerable to bullying in schools, and that the word "Jew" is used as a curse word. A population survey conducted by the Center for studies of the Holocaust and Religious Minorities in 2012 showed that 12.5% of the general population are significantly prejudiced against Jews. In October 2016, the Government will launch an Action Plan against Antisemitism. One of the aims of the Action Plan is to increase knowledge and awareness about present-day antisemitism in Norway.

The Tater/Romani Committee submitted its report "Assimilation and Resistance" (NOU 2015:7) in June 2015. The report concludes that in the 1900's, Romani People/Tater were subject to harsh assimilation policies by Norwegian authorities. The policies were expressed through laws and legislative decrees that had partly discriminatory purposes and a clear discriminatory effect. These policies have created negative prejudices towards this minority group, and fear and distrust between the minority and mainstream society. The Committee also finds that there is very little dissemination of knowledge about the culture and history of the Romani People/Tater in kindergartens, schools and teacher training programs. The Committee's study of two generations of Romani People/Tater who were subject to assimilation measures show alarmingly high mortality rates and a significantly lower level of education than the population in general. The report is currently subject to public hearing. Following this hearing, the Government will decide upon how to follow up the Committee's recommendations.

It is assumed that 500–700 Norwegian Roma have their permanent residence in Norway. The vast majority live in the city of Oslo.

Living conditions for Norwegian Roma are worse than in society at large. Several families have complex and difficult life situations and experience poverty. Roma report that they are subjected to discrimination in the housing market, and few seem to be employed. The level of education seems to be substantially lower than in society at large.

An Action plan to improve living conditions for Roma in Oslo was launched in 2009. Its main objective was to combat discrimination against Roma and ensure the minority group better living conditions. The Government received an evaluation of the Action Plan in 2014. The evaluation highlighted the need for a revision of the Government's efforts to improve Roma's living conditions.

One of the recommendations in the evaluation is to prioritize children's education. The city of Oslo has employed a teacher, a Roma Guide, who functions as a link between schools and Roma families. This measure has proven to be successful. It has shown to improve the relations between school and home. To follow up the evaluation, two more Roma Guides will be employed. In cooperation with the municipality of Oslo and Norwegian Roma, the Government is also considering how a counselling service for Norwegian Roma can be organized to function as intended.

The Kven minority in Norway have the right to education in Finnish in Troms and Finnmark if there are at least three pupils within the municipality who ask for it. Finnish and Kven language have equal standing in the curriculum for Finnish education. The right to education in Kven language is however dependent on available teachers.
The Ministry of Local Government and Modernisation invited Kven organisations and institutions and several government agencies to an input conference on Kven language in April 2016. The focus of the conference was how to make the measures for Kven language more targeted and effective.

In 2014 the Norwegian Directorate for Education and Training developed information materials about Norway’s national minorities – for kindergarten and school staff. The publication contains information about Norway’s five national minorities and will give a brief introduction to the history, languages and way of life of Jews, Kvens / Norwegian Finns, Forest Finns, Roma (Gypsies), and Romani people / Tater. The publication is aimed at staff in kindergartens and schools and may lead to a better understanding of the backgrounds of minority pupils. The material can also be used when teaching children or pupils about our national minorities. In the Chapter about the Roma the Genocide has been given a particular attention.

The introduction includes a brief section on issues the staff may wish to reflect on if they have children or pupils from national minorities in their kindergarten or school, and it contains extracts from relevant legislation, the Framework Plan and the national curriculum. It also include extracts from the Framework Plan and national curriculum describing how all children and pupils should learn about our national minorities.

There is no statutory right to national minorities in higher education. However, there is an equal right to admission for everyone that meets the formal requirements. No rules or regulations in Norway prevents or obstructs the access to higher education for students with a non-Norwegian background.

Immigrants and refugees
Children and youths
In 2015 there was a large increase of immigrants and asylum seekers to Norway. Legal immigrants should be enabled to contribute with their resources in working life and in the general society as quickly as possible. Rapid and good settlement of refugees shall form the basis for an active life in safe surroundings. Furthermore, the Government wishes to prevent and mitigate the development of a class-divided society, where persons with immigrant background have poorer living conditions and a lower rate of social participation than the population in general.

Norwegian kindergartens shall be inclusive settings that provide children and families with the possibility to participate and be part of the community and fellowship. Many children do not have Norwegian as their mother tongue, and learn Norwegian as a second language in their kindergartens. Kindergartens must support them in their use of their mother tongue, whilst working actively to promote Norwegian language skills. The government is concerned that all children should be proficient in Norwegian before entering school. This is fundamental in order to succeed in their continued learning and development, and to their active participation in society. Measures to increase participation of minority languages speaking children in kindergartens have therefore been put in place, such as reduced parental fees, free core time and economic support to municipalities in developing reach-out measures. A pilot of universal free core time in kindergartens in municipalities with a high proportion of
migrants showed good results for later schooling compared to areas without free core time. As indicated above, free core time has therefore been put in place for children aged 3, 4 and 5 in low income families.

Norwegian language development and instruction is regarded a prerequisite for the full integration and inclusion of minority language children and pupils in Norway. Thus, the Government grants special economic support to the municipalities for provision of extra mother-tongue and Norwegian language lessons to this group in schools, in order to enhance integration and language development. A special earmarked funding is provided to municipalities in order to support minority children's language development and is used in different ways; bilingual assistants, pedagogical material or Norwegian language activities. 35% of minority languages speaking children in kindergartens received extra language stimulation in 2015. Out of a total of 624 000 pupils at Norwegian primary and lower secondary level in the school year 2015-2016, 43 400 (7%) received special instruction in Norwegian. The number receiving special instruction in Norwegian has been stable during the last years, but the number of students receiving mother tongue instruction or bilingual subject teaching has decreased. From 2012 county authorities may organize newly arrived students in introductory classes or schools for a short period of time, before they join ordinary classes with other children at the same age in primary and secondary schools. The aim for the introductory classes /schools is that the students as soon as possible, learn Norwegian to be able to participate in ordinary classes.

The Directorate for Education and Training (UDIR), The National Centre for Multicultural Education (NAFO), have established a network for municipalities in order to improve the local competence related to providing education for children and young people seeking asylum in Norway. The municipalities have been given information and guidance on rights and regulations in the education system. There have been several measures over the last years to strengthen the competence on multicultural perspectives and second language accusation, among those the revised teacher education programs, and the strategy "Competence and diversity" (2013-2017) for kindergartens and schools.

The high rise in immigration in 2015 called for immediate action to assist the school owners. Among the measures are a "teacher pool" where school owners can search for available teachers in their area with the expertise they need locally, and a "school box": the website skolekassa.no with learning tools in several languages to support children living in reception centers learning Norwegian and other subjects. In the autumn of 2016 there will be arranged short courses to build competence among school leaders, teachers and others relevant groups on migrant education.

The Directorate for Education and training have created a website with guidance to kindergartens and schools on refugees. This includes four articles providing guidance on the reception, on post-traumatic-stress etc. http://www.udir.no/Spesielt-for/Minoritetsspraklige-elever/flyktninger/.

In 2014, 34% of all Norwegian residents in the age group 19-24 attended higher education. The percentage was 41.5 for descendants of immigrants (persons born in Norway of two foreign-born parents). 16.8% of immigrants in the same age group were enrolled in higher education.

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education. Also in the age group 25-29, the share of Norwegian born people with two foreign-born parents was higher than the for the total age cohort; 19.8 % compared to 15.2. In this age group, the share of immigrants was only 8.4 %. One reason for the lower attendance is that fewer attend upper secondary education, and the drop-out rate is high for this group. Many immigrants arrive late in the school age, and therefore have less time to learn sufficient Norwegian to have a high learning outcome and to be able to complete upper secondary school. In the age group 19-34, more women attend higher education than men in the general population: 26.4 % of the women and 18 % of the men, respectively (2014). Participation rates are higher for the immigrant population: Among the Norwegian born women with foreign-born parents, 34.3 % was in higher education while 26.5 % of the men in the same category. Among the immigrants, the rates were 10 and 7.1 % for women and men, respectively.

Norwegian born people with two foreign-born parents tend to attend prestigious study programs like medicine, dentistry, business, law and engineering. Their entry qualifications are above average.

Integration of adult immigrants
Out of a total population of 5.2 million, there are 850 000 immigrants and Norwegian-born persons with two immigrant parents living in Norway. While immigrants live in all 429 municipalities, the largest concentration is in Oslo, where they constitute 33% of the total population. The immigrants come from 222 countries. Slightly above half of them come from Asia, Africa and Latin-America.

4 in 10 have lived in Norway for four years or less. Of the 461 500 immigrants that arrived between 2006 and 2015, 22 % were refugees, 33 % labour immigrants, 33 % for family reasons and 5 % came in order to study (Statistics Norway). A substantial number of non-Western immigrants arrive Norway with no or little formal education from their country of origin. They need to develop their basic knowledge about the Norwegian society and Norwegian language.

Introductory program for refugees
The purpose of the introduction scheme is to achieve swift integration for refugees into social and working life. From September 1st 2004 newly arrived refugees between 18 and 55 years of age have a statutory right and obligation to full-time training for basic qualifications through an introduction program. This also applies to persons granted residency on humanitarian grounds, persons who have collective protection and those who immigrate in order to be reunited with family members in these categories. In 2015 nearly 18 000 immigrants participated in such courses.

The municipalities where the refugees settle are responsible for delivering and adapting the introduction program to the individual. The language learning has to be in accordance with

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7 Based on a request from the MOER, Analysis Norway (Samfunnsøkonomisk analyse AS) has calculated the socio-economic costs of children and young people who come to Norway as asylum seekers or refugees receiving inadequate primary and secondary education. http://www.samfunnsøkonomisk-analyse.no/SiteAssets/offentliggiorte-oppdragsanalyser/R36-2016%20Kostnader%20ved%20mangelfull%20utdanning%20av%20barn%20med%20innvandrerbakgrunn.pdf

The national curriculum in Norwegian language and social studies for adult immigrants and must be provided within three months after settlement.

The Norwegian language training and social studies form a vital part of the introductory program, which runs for a full year on a full-time basis. Language training is minimum 300 hours. If needed, participants can get up to 3000 hours. Municipalities are obliged to offer additional training. The training must be completed within five years.

Newly arrived refugees and persons who have been granted family reunification are given classes free of charge and receive an annual introduction benefit corresponding to some 17 000€. EU citizens, students and au-pairs have to pay for their tuition. Persons from outside the EEA-/EFTA area with a work permit are entitled to get 300 hours of tuition, but they have no legal right to get the courses free of charge.

Various forms of working life practice are included in the program. «Language practice» is a method used in the Norwegian language training process. The idea is that an enterprise accepts a refugee for a shorter period of time. The aim is to give the learner language practice that is connected with working life. Job practice is intended to give the individual working life experience and improved possibilities of a positive entry into the labour market. The government provides the municipalities with an earmarked per capita grant varying with the participant’s national background, test results from the courses, and other criteria. Establishing groups exclusively for alphabetization is a challenge in several municipalities. A low number of participants altogether combined with limited funding makes it tempting for administrators to place participants of different tracks in the same group.

Comments from relevant ministries are incorporated in this report. Comments from Sametinget and Utdanningsforbundet are annexed to this report and expresses their positions.

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Annex 1:

Overview of institutions and organizations that have been invited to contribute to the 9th periodical reporting

Arbeidsdepartementet
Barne-, likestillings- og inkluderingsdepartementet
Justis- og beredskapsdepartementet
Kommunal- og moderniseringsdepartementet
Utenriksdepartementet

Barneombudet
Likestillings- og diskrimineringsombudet
Sivilombudsmannen

Sametinget
Elevorganisasjonen
Islam råd
Kirkerådet
Human-Etisk Forbund
Røde Kors
Norsk organisasjon for asylsøkere
Nova
Amnesty International Norge
KS – Kommunenes sentralforbund
LO – Landsorganisasjonen i Norge
NHO – Næringslivets hovedorganisasjon
Utdanningsforbundet

Annex 2:
Comments by Sami Parliament and Union of Education, Norway