

Victim Support Europe (VSE) - Submission to the Public Consultation on the EU Gender Equality Strategy 2026–2030

1. Executive Summary

The EU Gender Equality Strategy 2026–2030 is a critical opportunity to deliver real-world change for all victims of crime, regardless of gender. Gender-based violence (GBV) is not a peripheral issue but a fundamental barrier to equality across every area of life. GBV can take place anywhere, anytime and to anyone regardless of gender, age, sexual orientation, age, ethnicity, migration status, or disability. Preventing GBV and addressing the harm it causes is critical to achieving overarching equality priorities and broader fundamental rights objectives.

Despite significant legal advances, the implementation of EU victims' rights remains fragmented and inconsistent across the EU. Many people face re-victimisation through institutional inaction, procedural bias, or lack of access to victim services.

Victims' voices and experiences can pave the way to make all sectors across the EU safe and inclusive, if the EU fails to act boldly now, it risks entrenching existing inequalities for another generation. The next Strategy must place the lived experiences of victims at its core, ensuring **rights** are not only enshrined in law but implemented and fulfilled in practice across all Member States and for all people, regardless of their gender. The cross coordination of the EU directives and strategies related to victims must be meaningfully implemented in all EU Member States, ensuring all victims have access to the necessary infrastructures; victims' rights should become a foundational principle in all EU policy sectors.

With this in mind, Victim Support Europe (VSE) calls for a collaborative, inclusive, and victim-centred Gender Equality Strategy that delivers concrete change; stronger protections, better support, equal and safe access to justice, and coordinated, cross-border implementation that leaves no victim behind and promotes reporting, effective and empathetic communication, identification and assessments, referrals to support services and restoration.

VSE calls for a strategy that moves from commitment to action, with a strong focus on:

- 1. Prioritising all forms of GBV as a structural barrier to gender equality;
- 2. Effective Implementation of existing EU legislative frameworks and strategies;
- 3. Ensuring all victims in the EU have access to the necessary services and supports.

2. Crime and Victimisation: A Core Barrier to Equality that must be prioritised in the strategy

Crimes driven by gender inequality continue to affect millions in the EU. One in three women experience GBV; LGBTQ+ communities face rising hostility; and intersecting identities - migrants, people with disabilities, Roma - remain under-protected. GBV against men and boys is increasing



and becoming more visible. A coherent and all-encompassing equality strategy must address all gender-based crime not only as a consequence of inequality but as a driver of it.

The 2026–2030 Gender Equality Strategy must prioritise a robust, harmonised, and victim-centred EU response across all thematic areas, addressing not only legislative standards but also the systems and structures that enable gender inequalities to persist.

2.1 Mainstreaming GBV and victimisation across all policy fields

GBV can be committed across all sectors and walks of life - health, education, employment, digital, social protection, and justice - which means prevention and response solutions must equally be implemented across all sectors in a coordinated and sustained way. A fundamental barrier to the implementation of victims' rights is the ad hoc, short-term and localised approach that is often adopted. The Gender Equality Strategy provides a natural opportunity to ensure that across all sectors there is co-ordinated actions to maximise victims' ability to access services, report crime and recover from it. GBV affects all aspects of a victims' life with victims often facing numerous barriers to reporting the crime and seeking help. Only by adopting a whole of society approach can we truly address the needs of victims. This means the identification of victims, protection measures, assistance, information and referral are facilitated in schools, medical centres, social services, work places and beyond. The EU must equally mainstream GBV across all its policy work and funding programmes.

2.2 Addressing root causes of gender-based violence through early intervention, education, and community empowerment.

The Gender Equality Strategy must continue the long-term objective to address the root causes of GBV which are founded on assumptions around gender roles and behaviours, societal normalisation of violence and control, childhood exposure to violence and adverse childhood experiences and environmental factors that create stressors in families such as poverty, housing insecurity and unemployment.

The Strategy must address rising levels of misogyny – especially online.

Neither should the strategy ignore the significant role that the online space and social media platforms have in encouraging and enabling GBV. A concerted effort to develop coherent and effective policies that genuinely start to address this issue must be established whilst balancing freedom of speech, privacy and economic factors:

1. A 2024 study by Dublin City University's Anti-Bullying Centre found that within just 23 minutes of setting up accounts on TikTok or YouTube Shorts, users were exposed to masculinist, anti-feminist, and extremist content. Across platforms, the algorithm suggested an average of 76-78% of toxic or harmful content after limited engagement.¹

¹ Ging, D., Baker, C., & Andreasen, M. B. (2024, April). Recommending Toxicity: The role of algorithmic recommender functions on YouTube Shorts and TikTok in promoting male supremacist influencers. DCU Anti-Bullying Centre, Dublin City University.



2. Various reports indicate that young men frequently watch porn and that a potentially significant proportion of this contains violence or is of a violent nature. These trends may in part explain the normalisation of violence such as strangulation during sex.²

2.3 Supporting social ecosystems: equipping families, schools, workplaces, and communities to act as allies in preventing violence and supporting victims.

Men and boys constitute the majority of perpetrators of crime, but they are the largest group of victims in many categories, particularly of violent crimes. In 2020, across 26 EU Member States, 64% of homicide victims were men, 36% were women.³ Men and boys are being indoctrinated into organised crime under the guise of protection, when in reality this can expose them to increased risk of both committing serious crime as well as falling victim. A key deterrent for this would include social and community programming. ⁴

Supporting and funding parenting, social and community initiatives as well as inclusive programmes to incorporate positive social models of engagement and anti-GBV approaches is necessary when trying to achieve a gender equal society. This includes education in schools on age-appropriate relationships; consent; empathy, resilience, non-violent communication, conflict de-escalation, digital literacy, etc. The content of these programmes should address both positive and negative behaviours. Programmes should also focus on increasing the willingness of individuals, including peers to speak out and stand up for victims, covering not only the theory but also focus on skills development.

Helping victims and their social networks to report crimes and seek helps must be prioritised. Crucially, they should also include bystander intervention training aimed at increasing individuals' and peers' willingness and ability to speak out, intervene safely, and stand up for victims. These programmes must go beyond theory to focus on practical skill-building, enabling participants to respond effectively to situations of abuse and harassment. These priority skills and behaviours can be incorporated into a wider victimisation and positive citizen agenda since they are largely the same skills. This brings other advantages in terms of efficiency and also buy in – with this form of education being provided in a positive setting around social skill.

 $\frac{https://antibullying centre.ie/recommending-toxicity-how-tiktok-and-youtube-shorts-are-bombarding-boys-and-men-with-misogynist-content/$

 $^{^2}$ Prevalence of Sexual Strangulation/Choking Among Australian 18–35 Year-Olds - PMC

³ Crime and criminal justice statistics - Statistics Explained - Eurostat

⁴ Radicalisation Awareness Network (RAN). (2023, June 21). Trauma, violent extremism and masculinity: RAN Mental Health meeting, Bologna, 20–21 June 2023. European Commission. https://home-affairs.ec.europa.eu/whats-new/publications/ran-mental-health-trauma-violent-extremism-and-masculinity-bologna-20-21-june-2023 en Topping, A. (2025, March 25). Online gangs of teenage boys sharing extreme material are 'emerging threat' in UK. The Guardian. https://www.theguardian.com/uk-news/2025/mar/25/online-gangs-teenage-boys-sharing-extreme-material-emerging-threat-uk



2.4 Addressing GBV against all victims

As has been stated already, GBV can impact anyone, anywhere, at any time. Women and girls remain disproportionately affected by GBV due to enduring gender inequalities across Europe.

The 2024 FRA report⁵ found that in total, **19.3 % of women in the EU-27 have experienced physical violence or threats and/or sexual violence in their lifetime by a domestic perpetrator,** that is, an intimate partner or a relative, or another person living in the same household as them. ¹⁷ Gender non-conforming individuals are also particularly vulnerable, with **an estimated 54% of transgender and non-binary people reporting lifetime experiences of intimate partner violence. ⁶ In some Member States, such as Spain and Finland, men represent roughly one-third of those reporting domestic violence incidents or being granted protection orders. In Spain, 38.9% of individuals with protection orders or interim measures in domestic violence cases were men in 2023, while in Finland, around 32% of recorded domestic violence victims were male. ⁷ Men are disproportionately affected by street and institutional violence, yet face significant barriers to accessing support, including gender stereotypes, disbelief when seeking help, a lack of male-specific services, and legal or policy frameworks that focus exclusively on women.**

Facing this gap requires:

- 1. Early, targeted interventions that place men and boys at the centre of them.⁸ Effective measures include **restricting access to violent content** (e.g. proposed UK law banning pornography depicting strangulation⁹).
- 2. **Investing in community initiatives** in high-risk areas, parent training, and expanding access to mental health services.
- 3. Formally **recognising GBV against all genders** while maintaining a strong focus on violence against women and girls;
- 4. Ensuring the development and funding of services for men, LGBTIQ+, and gender-diverse victims that address their specific needs;
- 5. Recognise that men and LGBTQ+ people can be victims of GBV, particularly in homophobic or transphobic contexts;

⁵ European Union Agency for Fundamental Rights. (2024). EU gender-based violence survey – Key results. https://fra.europa.eu/sites/default/files/fra_uploads/eu-gender_based_violence_survey_key_results.pdf

⁶ Flannery, S. (2025). Domestic violence in the transgender community. DomesticShelters.org. <u>https://www.domesticshelters.org/articles/race-gender-religion-immigration/domestic-violence-in-the-transgender-community</u>

⁷ Statistics Finland. (2024). Number of victims of domestic violence in Finland from 2013 to 2023, by gender [Graph]. In Statista. https://www.statista.com/statistics/1238947/number-of-victims-of-domestic-violence-by-gender-finland/ Statista

Instituto Nacional de Estadística. (2024). Statistics on Domestic Violence and Gender Violence (SDVGV). INE. https://www.ine.es/dyngs/Prensa/en/EVDVG2023.htm INE

⁸ European Union Agency for Fundamental Rights. (2021). Crime, safety and victims' rights: Fundamental Rights Survey. https://fra.europa.eu/en/publication/2021/fundamental-rights-survey-crime

United Nations Office on Drugs and Crime. (2019). Global study on homicide 2019: Gender-related killing of women and girls. https://www.unodc.org/unodc/en/data-and-analysis/global-study-on-homicide.html

⁹ End Violence Against Women Coalition. (2025). Government bans strangulation in porn. End Violence Against Women. https://www.endviolenceagainstwomen.org.uk/government-bans-strangulation-in-porn/



- 6. Mandating the collection and analysis of comprehensive, gender-disaggregated data;
- 7. Challenging harmful stereotypes that deter help-seeking and perpetuate exclusion.

3. From Regulation to Implementation

3.1 Co-ordinated implementation of EU laws

The EU has developed a strong portfolio of rights-based legal frameworks and strategies as well as an extensive list of recently adopted victims' laws, from human trafficking and child protection to digital safety, compensation rights, disability, Roma inclusion, and LGBTIQ+ equality. This creates both risks and opportunities; meaning the EU must use the Gender Equality Strategy to support a co-ordinated implementation of these laws. This requires a balanced focus on solutions that benefit all victims and those that address the needs of specific victims. Many of the implementing measures that must be taken at the national level can be applied to a range of policies or victims, or indeed to all victims of crime. Taking this inclusive approach will maximise the value of any new laws and actions and allow States to focus more effort on targeted action which addresses the specific needs of victims of gender-based violence. To achieve this, VSE recommends that GBV policies adopt a victim-centred approach that puts the rights and dignity of victims, including their well-being and safety at the forefront. This can be achieved by the UN-defined five core needs of victims in order to uphold their rights and dignity; **recognition**, **protection**, **support**, **justice**, and **compensation**.¹⁰

By adopting this approach, the EU can further its mission in implementing and achieving the Sustainable Development Goals, in particular:

- SDG 5: Gender Equality
- SDG 16: Peace, Justice and Strong Institutions
- SDG 3: Good Health and Well-being
- SDG 8: Decent Work and Economic Growth
- SDG 10: Reduced Inequalities¹¹

3.2 Effective implementation at national level

Co-ordination of implementation at the national law must be a priority which means supporting the establishment of national victim support frameworks which establish coordination and oversight mechanisms such as multi-sector policy and implementation committees at national and local level, independent victims' commissioners and ombudspersons etc.

Victim Support Europe's *National Framework for Comprehensive Victim Support* guides Member States in building these systems, which should include:

A national victims' rights strategy with long-term priorities and objectives;

¹⁰ See: https://www.ohchr.org/sites/default/files/victims.pdf

¹¹ See: https://sdgs.un.org/goals



- A national coordinator overseeing delivery;
- An independent victims' commissioner to monitor policy and represent victims' voices;
- Implementation committees and ad hoc working groups for policy development and coordination;
- Advisory councils involving victims directly in decision-making;
- A national referral mechanism linking victims to appropriate services.

Services should combine:

- **Generic victim support** available to all victims of crime;
- **Specialist services** for specific groups or crime types;
- **Institutions with victim expertise** such as trained police units, hospitals, and social workers.

All services must be widely available, accessible, acceptable, and of quality (AAAQ framework) to ensure timely and rights-based support. Portugal offers an example, with a national network of 133 support centres, 39 long-term shelters, and 26 emergency shelters, including specialised facilities for LGBTIQ+ victims, male victims of trafficking or domestic violence, and women with disabilities. Services integrate legal, psychological, and social assistance, and recognise children as victims in their own right. This model demonstrates the value of an inclusive, multi-layered support infrastructure.

3.3 Overcoming Social Barriers to Achieve Targeted and Gender-Sensitive Victims' Rights

Societal attitudes like victim-blaming and stigma continue to prevent victims from seeking help, reporting crimes, and accessing their entitled support and justice. Many Member States' services still lack basic accessibility, such as multilingual resources and accommodations for people with disabilities or neurodiverse individuals. Without addressing these structural and attitudinal barriers, victims remain unequally protected, undermining the core goals of the Strategy. At the same time, it is worth mentioning that boys and young men are now doing noticeably worse in school, they have high dropout rates and exclusion, they are too often in family breakdown situations and do not have positive role models at home or in the community. Such issues must be addressed as part of broad equality priorities.

At the same time, a number of the above factors may also be influencing young men towards extremist ideologies including misogyny. ¹² Ultimately if these matters are not incorporated into strategic objectives related to GBV prevention, the increasing numbers of violent crimes based on gender are likely to continue. In other words, a gender equality strategy must be inclusive of all genders as a fundamental rights issue, and it must also address challenges faced by vulnerable young men specifically from the perspective of addressing trends in extremism and misogyny. Across the EU, implementation of victims' rights is fragmented, with inconsistent definitions,

¹² N Women Australia. (2025). What is the manosphere and why should we care? UN Women Australia Explainer. https://unwomen.org.au/what-is-the-manosphere-and-why-should-we-care/



enforcement, and coordination leading to secondary victimisation, discrimination, and gaps in service provision. National strategies often focus on specific issues like gender-based violence or trafficking but rarely adopt a comprehensive, cross-cutting approach, causing duplication and inefficiencies.

Support services are unevenly available, underfunded, and siloed, leaving many victims without adequate assistance or tailored risk assessments. Language barriers and complex compensation procedures further hinder access to justice. Training for professionals working with victims is often inconsistent and insufficient. To overcome these challenges, the EU must help Member States build coordinated, systemic victim support frameworks that enable effective referrals and collaboration between specialist and generic services. Training must be trauma-informed, victim-centred, and gender-specific, equipping all professionals who interact with victims to understand the impact of crime, engage empathetically, and actively facilitate access to rights, justice, and support.

3.4 Victims of cybercrime and violence

Cybercrime and violence is increasingly becoming a threat worldwide. Much of today's crimes can take place with a click of a button. Technology-facilitated gender-based violence (TFGBV) affects people of all genders exacerbating existing inequalities and creating new forms of harm. Whilst it disproportionately targets women and girls, any person of any gender can fall victim to cybercrime, including non-consensual image-based sexual abuse, cyberstalking, online coercion, doxing, and economic abuse such as fraud and financial blackmail.¹³ The borderless and persistent nature of digital abuse allows it to follow victims across platforms, geographies, and even into their physical lives.

The Gender Equality Strategy must prioritise the integration of TFGBV within EU-wide policy and legal frameworks. This includes recognising TFGBV as a specific form of GBV across EU legislative files and frameworks as well as implementing specific programming to address TFGBC. Coordinated action should include mandatory digital literacy and comprehensive sex and gender education, platform accountability, victim support services tailored to online harms, and improved cross-border law enforcement cooperation. Importantly, the Strategy must also address the rise of online misogyny and radicalisation of young men and boys, often incubated in unregulated online spaces, that fuels online and offline violence and undermines gender equality efforts. ¹⁴ Tackling TFGBV is critical not only to protect victims but to uphold democratic values, public safety, and the EU's broader commitment to ending all forms of GBV.

3.5 Social support network and personal resilience

Evidence shows that strong social support networks significantly improve victims' outcomes, highlighting the need to build societal awareness of how the public can help victims and enhance resilience. Victim Support Netherlands has developed an online platform named 'For the helpers',

¹³ European Institute for Gender Equality. (2017). Cyber violence against women and girls. https://eige.europa.eu/publications/cyber-violence-against-women-and-girls

¹⁴ Debbie Ging (2023) 'Digital culture, online misogyny and gender-based violence' In: Handbook on Gender, Communication and Women's Human Rights. New Jersey: Wiley-Blackwell.



where information is available on providing support to victims of crime by the victim's social support network.¹⁵

3.6 Good practices and recommendations

Effective solutions exist. For instance, Portugal operates a national victim support network with 133 support centres, 39 long-term shelters, 26 emergency shelters, and specialist services for diverse victims. It includes legal, psychological, and social support. *France Victimes'* Mémo de Vie platform allows secure documentation of abuse and access to emergency contacts, particularly for victims unable or unwilling to immediately report. ¹⁶ However, progress must continue through strengthened research, data collection, and the development of laws and policies, including in critical areas such as rape and consent.

To that end, VSE recommends:

1. Recognise GBV Victimisation as a Cross-Cutting Policy Priority

- Prioritise full and effective implementation of EU legislation, including the Victims'
 Rights Directive and its revision, VAWD Directive, Anti-Trafficking Directive, and Child
 Sexual Abuse Directive.
- Align actions with global frameworks such as the UN SDGs (5, 10, 16).
- Ensure implementation spans justice, health, education, employment, digital, migration, and security policies.
- Involve victims meaningfully in policy design and evaluation.
- Focus on supporting male and boy victims and engaging men and boys in prevention efforts to challenge misogyny and foster equality.
- 2. Ensure the implementation of a Safe Justice¹⁷ approach by establishing EU-wide minimum standards for victim reporting, information provision, participation, and protection, grounded in a trauma-informed, rights-based, and victim-sensitive framework.
 - Diversified, accessible reporting mechanisms, supported by trained professionals and designed to protect victims' personal data.
 - A communication-based approach to victim information, ensuring timely, repeated, and individually tailored updates in accessible formats.
 - Guaranteed access to legal and psychosocial accompaniment throughout proceedings, including victim impact statements and facilitated participation mechanisms (e.g. court based support, facility dogs).
 - Holistic protection needs assessments, enhanced access to protection measures, and innovative tools to reduce re-traumatisation and enhance safety. Such a framework would uphold victims' rights, strengthen their role in justice processes, and contribute to building fairer, more resilient justice systems across the EU.

¹⁵ See: Victim Support Netherlands, https://www.slachtofferhulp.nl/voordehelpers/

¹⁶ See: www.memo-de-vie.orgwww.memo-de-vie.org

 $^{^{17}\,\}text{See:}\,\underline{\text{https://victim-support.eu/publications/safe-justice-for-victims-of-crime-discussion-paper/}$



3. Enhance Protection and Remove Barriers to Reporting

- Create accessible, inclusive protection systems offering timely orders, safe housing, psychosocial support, and extended coverage to cyber-GBV victims (doxing, image-based abuse, stalking, hate speech).
- Provide professional training to counter victim-blaming and stigma, promoting trauma-informed, victim-sensitive responses across sectors.

4. Strengthen Early Identification and Multidisciplinary Responses

- Introduce screening and referral in health, education, employment, asylum, and social services.
- Foster integrated multi-agency teams for risk assessment, coordinated support, and long-term recovery.
- Include digital service providers in identification and referral, ensuring victims of online GBV receive legal, psychological support, reporting tools, and protection from digital re-traumatisation.

5. Empower Victims Across All Genders and Backgrounds

- Guarantee equal access to specialised, confidential support, legal aid, compensation, and tailored services addressing intersecting vulnerabilities (LGBTQ+, migrants, persons with disabilities).
- Fund and support grassroots and community organisations, especially those led by or working with marginalised groups.
- Promote victim-led policy design and monitoring to reflect real needs and build institutional trust.

6. Promote a Whole-Community and Whole-Society Approach

- Invest in awareness and prevention initiatives that promote gender equality, consent education, and respectful relationships from early education to the workplace.
- Engage employers, unions, faith groups, sports clubs, and community leaders in prevention and support networks.
- Equip digital platforms and tech companies with responsibilities and tools to counter online GBV.
- Adopt a public health and societal perspective recognising GBV as a threat to public safety, democracy, and social cohesion.

7. Prioritise Employment and Economic Empowerment in GBV Response

- Recognise employment and economic security as crucial for recovery and protection.
- Enforce workplace policies on GBV and harassment, provide paid leave and flexible arrangements, train employers and HR on victim support, and protect victims from discrimination or dismissal.



8. Implement Strategic, Long-Term National Frameworks Aligned with VSE's National Framework¹⁸

- Establish comprehensive national strategies with coordinators, victim commissioners, working groups, and referral mechanisms.
- Ensure mandatory cross-sector coordination integrating justice, education, health, housing, and employment sectors.
- Secure stable, long-term funding for both generic and specialist victim support services.
- Deliver trauma-informed and inclusive training to eliminate secondary victimisation.
- Address technology-facilitated GBV (image-based abuse, cyberstalking, online coercion, sextortion) through legal harmonisation, digital education, platform regulation, cross-border enforcement, and inclusion of specialised digital forensic support and rapid response mechanisms in national strategies.

4. Conclusion

To fulfil the EU's commitment to gender equality, dignity, and safety, the next Strategy must make victimisation a cross-cutting priority in all policy areas, moving beyond justice or gender portfolios to coordinated implementation and investment that turns legislative commitments into real-world delivery. It must ensure inclusivity by recognising and supporting all victims, regardless of gender or identity, while mainstreaming diversity in all measures. This requires strengthening early intervention; driving cultural change to tackle harmful online content; guaranteeing equal access to safe justice and protection measures for the most marginalised and vulnerable; and investing in comprehensive, accessible, trauma-informed (specialised) support services. Data collection and accountability mechanisms must be improved to ensure transparency and monitor progress, supported by sustained, long-term funding to make services resilient, coordinated, and equitable.

The European Commission must ensure that its Gender Equality Strategy operationalises a rights-based, inclusive for all genders, and victim-centred approach to eradicating GBV. This requires cross-sectoral leadership, strong legal implementation, and the systematic inclusion of victims' voices at every stage. VSE and its members stand ready to work with the European Commission and Member States to deliver a Strategy that not only commits to equality in principle, but also delivers dignity, justice, and safety in practice.

¹⁸ See: https://victim-support.eu/wp-content/files mf/1673427018NationalFrameworkforComprehensiveVictimSupportcompressed.pdf