

# EU CIVIL SOCIETY STRATEGY

**Victim Support Europe (VSE)**

**Feedback to EC Open Public Consultation**

Victim Support Europe (VSE)\_2025\_Response to Consultation

## VSE's feedback submission for the first-ever EU Civil Society Strategy

### Introduction

Civil society organisations (CSOs)-particularly those supporting victims of crime- are indispensable actors in the protection and promotion of democracy, the rule of law, and fundamental rights. Their work is not only service-oriented but fundamentally democratic: by supporting vulnerable individuals, amplifying their voices, and demanding accountability, CSOs make rights real and safe justice accessible for all. Victim support organisations, in particular, help ensure that those affected by crime are protected, empowered, supported, and able to participate fully in society. This enables stronger, secure and more inclusive communities, where individuals can engage freely and meaningfully in civic life.

As direct intermediaries between institutions and citizens, CSOs are uniquely positioned to identify gaps in protection, expose systemic injustices, and advocate for meaningful reform. Their close work with affected communities and marginalised groups provides them with deep, practice-based expertise and knowledge, that is essential to shaping effective and rights-respecting policies. At both the national and EU levels, CSOs serve as expert partners in upholding dialogue, fostering trust, and ensuring that policy frameworks reflect the lived realities of those they are meant to protect.

Despite their essential contributions, these organisations face mounting challenges: shrinking civic space, the politicisation of victims' rights, arbitrary funding cuts, barriers to cross-border cooperation, and coordinated efforts to discredit or delegitimise their work. Victim support providers, like many CSO agents, may face increased scrutiny or political pressure, particularly when their work involves advocating for the rights of marginalised or vulnerable groups. As organisations that often highlight systemic gaps and seek institutional accountability, they can find themselves operating in sensitive political environments where their role is not always fully recognised or supported. Nonetheless, victim support organisations, as core members of Civil Society, persist as agents of democratic resilience and cohesion. Through trauma-informed care, non-violent approaches, and inclusive frameworks, victim support organisations help build a safer, more participatory society.

Yet, across the EU, chronic underfunding continues to undermine service delivery. VSE members report funding is often short-term, competitive, and insufficient for core service provision, forcing NGOs to prioritise survival over support. Generic victim support organisations deliver a wide range of services: reporting pathways, protection assistance, information provision and facilitation, effective communication and emotional support to drive empowerment, resilience-building and reintegration, legal information, risk and individual needs' assessment, practical assistance, and referrals to specialised care and targeted support upon determination of (special) needs.

To advance the EU's fundamental rights agenda, the Civil Society Strategy must strengthen and protect the role of CSOs, particularly those working with victims. Their expertise, grounded in daily engagement with affected communities, is not ancillary—it is central to building an EU where justice, dignity, and equality are not only promised but delivered.

## Victim Support Services

Civil society organisations working on victims' rights and support operate at the local, national, and European levels to ensure that all victims of crime receive the support, protection, and access to justice that they are legally entitled to under EU law. A cornerstone of this work is **generic victim support services**, which provide assistance to *all* victims of crime, not limited by crime type or demographic group. These services, when working in collaboration with specialist services, justice, healthcare sector, etc. can create long-term lasting change that benefits society. Victim support services are a vital investment. For every €1 spent, Member States see at least a €4.34 return<sup>1</sup>. Early, sustained support reduces long-term harm, re-victimisation, secondary victimisation and public spending.

Adding to this, as the EU strengthens legal obligations on Member States to provide victim support, there is a growing risk that some **governments may respond by shifting service delivery away from civil society organisations toward state-run structures**. While improving public systems is important, this trend can undermine the quality and accessibility of services—particularly when it displaces specialised NGOs that have built trust with communities and supported victims for decades. **State-run services often lack the same level of specialisation, flexibility, and victim-centred approaches**. EU legislation should not inadvertently lead to the replacement of effective civil society providers with less responsive government-run alternatives. Instead, it should actively promote the continued role of NGOs as essential partners in delivering high-quality, rights-based victim support.

They also play a proactive role in **preventing secondary victimisation**, by ensuring that victims are treated with dignity, respect, and compassion throughout their interactions with institutions—from the moment of reporting a crime to the conclusion of judicial or administrative processes. Through training, advocacy, and cooperation with law enforcement, judicial authorities, and social services, victim support organisations help build systems that avoid re-traumatising victims and instead empower them to seek justice safely.

In addition, they are key actors in **promoting rights awareness**, educating individuals about their entitlements under national and EU law, and providing accessible information in ways that reach all communities, including those who are often overlooked or excluded. This not only strengthens victims' ability to claim their rights but also fosters a broader culture of rights and accountability within society.

By ensuring that **even the most marginalised voices are heard**, victim support organisations contribute directly to **democratic resilience**. When people feel seen, protected, and represented, they are more likely to engage with democratic institutions and processes. In contrast, when victims are silenced or ignored, it fuels disillusionment, disengagement, and distrust in the system. CSOs help bridge this divide by giving voice to the voiceless and advocating for policy change grounded in real lived experiences.

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<sup>1</sup> See: [https://victim-support.eu/wp-content/files\\_mf/1673427018NationalFrameworkforComprehensiveVictimSupportcompressed.pdf](https://victim-support.eu/wp-content/files_mf/1673427018NationalFrameworkforComprehensiveVictimSupportcompressed.pdf)

## The importance of Victim Support Services for EU Society and Democracy

Victim services are not just a component of justice systems; they are a **vital enabler of democracy**, safeguarding the rights, safety, and dignity of individuals who have experienced harm. For example, the kick-off soon **OSPREY project** supports those who are victimised specifically because of their public roles in defending, promoting, or participating in democratic life, such as **journalists, politicians, police officers and human rights defenders** targeted by threats, violence, or intimidation; it will develop novel multi-faceted, multidisciplinary and operationally focused approaches, tools and capabilities for the protection of public-facing professionals at the core of our democratic institutions. By protecting these individuals, victim support services play a direct role in preserving open, pluralistic societies and the democratic values on which they are built. OSPREY focuses on online harms, as online environments are core attack vectors against public-facing professions and for threats against our open societies and democracy.<sup>2</sup>

By **bridging the gap between citizens and institutions**, victim support services ensure that victims are not only protected but also empowered to engage meaningfully in civic and democratic life. They help restore trust in public institutions, giving people a voice and reaffirming their place in society after experiences that often leave them silenced.

Through these roles, victim support organisations do far more than respond to harm, they actively contribute to building fairer, more just societies where everyone, regardless of status or circumstance, can participate equally and safely.

## Challenges Faced by Victim Support Organisations

Victim Support Organisations are **central to justice, fundamental rights, and democratic participation**, yet they are frequently **overlooked in civil society frameworks**. Despite their frontline expertise and direct engagement with some of the most vulnerable groups, they are often excluded from protections, consultations, and funding opportunities. This neglect not only undermines their work but also weakens the broader system of accountability and access to justice.

Many of these organisation operate under **chronic financial uncertainty**. Funding frameworks too often favour large-scale projects or established organisations, making it difficult for smaller, frontline NGOs to compete or access vital resources. In some instances, **unfair subcontracting practices also occur**, where consultancies or intermediaries benefit financially from the work of NGOs, while the NGOs themselves remain underfunded or unpaid. This instability is limiting their capacity to plan long-term, retain skilled staff, or respond to emerging needs.

In several Member States, we see a concerning trend where **victim support organisations are effectively penalised** for playing a critical role in exposing state failures or advocating for victims' rights. Rather than being recognised as essential partners, these organisations face **funding cuts or the complete**

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<sup>2</sup> European Parliamentary Research Service. (2021). Key social media risks to democracy; Downing, J. (2023). Social Media, Security and Democracy in the Digital Age. In: Critical Security Studies in the Digital Age. New Security Challenges (pp. 179-207). Palgrave Macmillan, Cham.

**withdrawal of public support**, often without transparent justification. In some cases, new administrative requirements or eligibility criteria are imposed, creating disproportionate burdens that smaller NGOs struggle to meet. In more extreme cases, CSOs face **public discrediting, delegitimisation campaigns, or informal instructions that block cooperation** with police, courts, or other agencies, directly undermining their ability to deliver services. This creates a dangerous balancing act: **speak out, and risk being silenced; stay silent, and fail the victims they serve.**

Victim Support Europe strongly urges the European Commission to **reaffirm and operationalise** its commitment to an **open, participatory, and rights-based civil society environment** by explicitly ensuring that **advocacy activities are not treated as grounds for funding exclusion.**

This role is clearly **enshrined in EU law and policy**, including **Article 11 of the Treaty on European Union (TEU)**, which guarantees the right of citizens and associations to participate in democratic life, and reinforced through frameworks such as the **European Democracy Action Plan** and the **Rule of Law Mechanism**. Restricting or penalising CSOs for engaging in advocacy (whether directly or indirectly) **undermines these commitments**, contributes to the **erosion of civic space**, and risks silencing critical voices, particularly those speaking on behalf of victims and other marginalised groups.

It is essential though to distinguish **advocacy from political partisanship**. Advocacy is not about supporting political parties or electoral outcomes—it is about **amplifying underrepresented voices**, challenging harmful systems, and **ensuring that policies reflect the lived realities of the people they affect**, especially victims of crime. For many organisations, especially those working with vulnerable communities, advocacy is an inseparable part of service delivery and systemic change.

The risks are even more acute when these organisations work with victims of **serious or politically sensitive crimes**, such as trafficking in human beings, gender-based violence, hate crime, institutional abuse, or crimes against minorities and migrants. In such contexts, victim support providers are not only underfunded but also **vulnerable to political and ideological pressure**, including attempts to discredit their work, restrict their mandates, or curtail their public advocacy. This undermines their ability to operate independently and effectively, and by extension, weakens the broader ecosystem of democratic accountability and human rights protection.

The EU must acknowledge and respond to these tactics, ensuring that civil society organisations are protected not only in law but in practice, so they can operate freely, independently, and effectively in support of victims.

This includes explicitly referencing victims' rights within its core objectives and **ensuring smaller NGOs are not overshadowed by large consultancies or international bodies**. **Reducing administrative and financial barriers is essential, as is enabling flexible and sustainable spending.**

When crime goes unaddressed and victims' needs are ignored, it undermines societal cohesion, public trust, economic stability, and the rule of law. When civic space is diminished, transparency suffers, and victims are left without critical support and representation. Victims' rights are not just a niche concern—they are a core element of a just, democratic society. **A strong, well-supported civil society is not a threat, but a necessary pillar of democracy**, ensuring that all individuals—especially those affected by crime—are seen, heard, and protected.

Support mechanisms should be embedded within the long-term budgets of all fundamental rights areas—with dedicated, ring-fenced funding to meet the specific needs of victims and to establish robust national frameworks for victim support.

## Recommendations for the EU Civil Society Strategy

To maintain a **just and democratic Union**, the EU Civil Society Strategy must **explicitly recognise generic victim support organisations as foundational actors within civil society**, and not peripheral service providers. The Commission should aim for an EU Strategy to support, protect, and empower civil society, ensuring protection against direct attacks (such as SLAPPs), reducing administrative burdens for CSOs, providing structural support to address power imbalances and ensuring operational financial support to enable CSOs to engage in EU policy development and implementation – especially by ensuring strong and structural support for civil society in the new MFF. The EU Civil Society Strategy can prioritise the following:

- **Protect their operational space**, including by safeguarding freedom of association, expression, and advocacy; **Reaffirm advocacy as a legitimate, protected, and necessary activity** for all CSOs, including those working on victims' rights;
- **Guarantee sustainable, multi-annual funding** that supports both core operational needs and service delivery, recognising that effective victim support depends not only on project-based outcomes, but on the long-term stability, independence, and institutional resilience of the organisations delivering these services. Funding should be flexible, predictable, and accessible, enabling organisations to retain qualified staff, respond to emerging needs, and engage meaningfully in policy and advocacy without compromising their service provision;
- **Prohibit funding exclusions or restrictions** based on advocacy involvement, even if framed in administrative or technical terms;
- And **promote a policy and funding environment** where CSOs can engage freely, safely, and sustainably in advocacy at both national and EU levels.
- **Ensure victims' representation in policymaking and the mainstreaming of victims' rights in all different policy sectors**, from EU-level consultations to national victim support frameworks, as currently there is a lack of recognition of the relevance and centrality of victims' themes across EU policies;
- **Acknowledge their critical role in upholding democratic values, not only by amplifying the voices of victims who are often left unheard, but also by serving as expert actors with deep knowledge of community needs.** Yet, despite this essential contribution, these organisations are too often **overlooked in policy discussions, under-recognised as relevant stakeholders**, and excluded from key decision-making spaces. Their practical experience and proximity to affected individuals make them invaluable partners, and they must be systematically included in shaping the laws, policies, and funding frameworks that directly impact victims' rights and protections..

The EU Civil Society Strategy should focus on protecting, empowering, and strengthening collaboration with civil society across Europe. This means moving beyond broad statements and focusing on **how** to truly protect, empower, and strengthen collaboration with civil society across Europe. Civil society, especially organisations working to uphold victims' rights, must be supported not only in principle but through concrete, sustainable measures that recognise their critical role in a democratic and rights-based Union.

Key actions should include:

- **Legal and policy safeguards** that protect civil society organisations (CSOs) from undue political interference, guarantee freedom of association and expression, and formally recognise advocacy as a legitimate and necessary democratic function;
- **Dedicated, multi-annual funding streams** to support both the operational capacity and long-term sustainability of CSOs, particularly those delivering essential services such as victim support;
- **Structured and meaningful participation mechanisms** at national and EU levels, ensuring CSOs are actively involved in shaping laws and policies—not just as consultees, but as co-creators;
- **Support for cross-border collaboration**, including funding for transnational networks and mechanisms to address the needs of mobile or cross-border victims;
- **Capacity-building and technical assistance** for smaller or under-resourced organisations, helping them engage in policymaking processes, access funding, and deliver high-quality services.

Only through these practical steps can the EU ensure that civil society is not only protected but empowered to thrive and contribute fully to the Union's democratic life and fundamental rights agenda. By embedding these protections and recognising their contributions, the EU can ensure that all victims, regardless of who they are or where they are, have access to the support they need, and that civil society remains a resilient pillar of European democracy.

If protecting civic space and safeguarding fundamental freedoms is to be a real priority in the EU Civil Society Strategy, it must be backed by concrete, enforceable measures. The EU should:

- **Establish minimum standards** for Member States to guarantee freedom of association, expression, and peaceful assembly, and monitor their implementation through existing tools such as the Rule of Law Mechanism;
- **Link funding eligibility** to respect for civic space and fundamental rights, ensuring that governments undermining civil society do not benefit from EU funds intended to promote those very values;
- **Create rapid response mechanisms** to support organisations facing threats, defunding, or legal harassment, including emergency funding, legal aid, and visibility;
- **Strengthen the role of civil society in EU policymaking** by embedding structured participation mechanisms across all institutions and legislative processes;
- **Protect and promote advocacy** as a legitimate democratic function, ensuring that civil society organisations can raise concerns, challenge public institutions, and campaign for change without fear of retaliation or exclusion from funding.

These measures would help ensure that civil society, especially those defending victims' rights, can operate freely, sustainably, and effectively across the Union.

Crucially, many victim service providers are **civil society organisations and NGOs**, working at the frontline of support and advocacy. It is essential that their work is not only recognised, but also **actively protected and sustainably supported**, rather than being side-lined, politicised, or weakened through a lack of funding or legal protections. Effective victim services are grounded in key principles: **empathetic**,



**non-violent communication**, a commitment to **building safe and cohesive communities**, and **resilience frameworks** that support individuals in recovering from trauma and continuing to participate fully in democratic life. By enabling victims to regain agency, dignity, and voice, these services contribute to stronger, more inclusive democracies—where no one is left behind.

## Good Practices

Examples of good practice across Europe clearly demonstrate that **meaningful support and engagement with civil society can significantly strengthen victims' rights**. In countries such as **Sweden** and the **Netherlands**, **multi-year structural funding** underpins the sustainability of core victim support services, enabling long-term planning, staff retention, and consistent quality of care. **Civil society networks** in these contexts provide vital platforms for coordination, peer learning, and knowledge-sharing, ensuring that best practices are disseminated and that services are responsive to evolving needs.

At the EU level, the **Commission's engagement with CSOs during the revision of the Victims' Rights Directive** has shown that inclusive and transparent consultation processes not only improve the quality of legislation, but also enhance its **legitimacy, ownership, and effectiveness** on the ground. These experiences show that civil society's inclusion is not merely symbolic—it directly contributes to better policy outcomes.

There are also concrete examples of how NGOs can be effectively integrated into policymaking processes **while maintaining their independence and operational sustainability**. For instance:

- **La Strada International** delivers child protection and shelter programmes with a cross-border dimension, demonstrating how victim services can be embedded in wider regional frameworks;
- The **EUCVT collaboration** facilitates coordinated, cross-border support for victims of crime, illustrating the added value of transnational civil society partnerships;
- **OSPREY** combines direct victim support with robust advocacy, showing how service provision and policy influence can go hand in hand. OSPREY will develop novel multi-faceted, multidisciplinary and operationally focused approaches, tools and capabilities for the protection of public-facing professionals at the core of our democratic institutions.

These models highlight the **critical value of integrating civil society organisations into decision-making processes** at both national and EU levels, **not as passive stakeholders, but as expert partners**. For this to be successful, CSOs must be supported with **adequate resources, legal protections, and operational autonomy**, ensuring they can continue their essential work on behalf of victims across the Union.

## Conclusion

To fulfil its commitment to democracy, justice, and fundamental rights, the EU Civil Society Strategy must explicitly recognise and strengthen the essential role of victim support organisations. These organisations play a critical role in protecting the most vulnerable members of society, bridging the gap between citizens and institutions, and contributing to the democratic resilience of Europe. Yet, despite their importance, they continue to face shrinking civic space, precarious and short-term



funding, exclusion from key policy processes, and increasing political pressure, particularly when engaging in advocacy.

A truly sustainable and rights-based civil society environment requires a shift in how victim support organisations are funded, included, and protected. To this end, the EU Civil Society Strategy should:

1. **Guarantee multi-annual, structural funding** for victim support services through dedicated EU programmes, ensuring long-term operational stability and allowing for strategic planning and capacity-building.
2. **Include explicit references to victims' rights** in the funding priorities of all relevant EU funding streams, making it clear that protecting and empowering victims is a cornerstone of the Union's values.
3. **Ensure meaningful participation** of victim support organisations in EU and national-level policymaking, including their involvement in consultations, expert groups, and co-creation processes.
4. **Protect advocacy as a core democratic function**, ensuring that NGOs working on victims' rights are not penalised for engaging in public discourse, raising concerns, or influencing policy.
5. **Promote national-level frameworks** that guarantee the independence and sustainability of victim support organisations, including through national funding, legal recognition, and coordination mechanisms.

By embedding these principles, the European Commission can ensure that civil society organisations, particularly those serving victims, are empowered to deliver justice, equality, and protection for all. In doing so, the Strategy would not only support individual rights but also reinforce the democratic values and social cohesion on which the European Union is built.

## About Victim Support Europe

*Victim Support Europe (VSE) is the leading European umbrella organisation advocating on behalf of all victims of crime, no matter what the crime, no matter who the victim is. VSE represents around 80 member organisations, providing support to more than 2 million people affected by crime every year in 36 countries. Founded in 1990, VSE has been working for more than 30 years for a Europe, and a world, where all victims have strong victims' rights and services, whether they report the crime or not; this year we are celebrating 35 years of victim support in Europe, while we are shedding light on the ongoing challenges faced by victims across Europe. We work towards this mission through advocacy to improve European and International laws, through research and knowledge development, awareness raising activities, through capacity building at national and local level and the provision of practical tools/resources and evidence-based recommendations for all crime victims. As a civil society actor, we:*

- *Provide a platform for national organisations to collaborate, share best practices, and coordinate cross-border support for victims.*
- *Engage directly with EU institutions and participate in legal and policy consultations.*
- *Monitor implementation of EU victims' rights legislation and advise on gaps and needs.*
- *Offer capacity-building and training to civil society organisations working with victims.*
- *Advocate for inclusive, victim-centred policy-making and sustainable funding for grassroots and national CSOs.*

*As a victim support network, we cover all victimisation experiences from gender-based violence to terrorism, hate crime to trafficking. We are committed to ensuring that no victim is left behind and that civil society remains empowered to uphold the EU's founding values.*