Ref. Ares(2025)7635775 - 12/09/202

EU TOURISM STRATEGY

Victim Support Europe_Response to EC Open Public Consultation



VICTIM SUPPORT EUROPE SUBMISSION EU Tourism Strategy

Introduction

Victim Support Europe (VSE) welcomes the opportunity to contribute to the consultation on the new EU Tourism Strategy, as a promising initiative to develop a new strategy for sustainable and competitive tourism in the EU. While VSE's primary focus is on promoting the rights and support of all victims of crime, as the umbrella organisation representing national victim support services across Europe, VSE recognises the intersection between tourism and victims' rights, especially around the safety, protection and well-being of individuals (both visitors and residents) within tourism destinations, as well as the linkages between tourism policy and access to safe justice, information provision, inclusivity, crisis response, trauma-informed and effective communication.

Linking tourism with Victims' Rights

Tourism is a vital sector for the EU's economy and cultural exchange, but **tourists can face heightened vulnerability to crime and victimisation**, particularly in unfamiliar environments or during high-profile events. Crime against tourists is an under-acknowledged vulnerability in EU tourism, ranging from petty theft to serious violence at large events. Both EU citizens abroad and tourists visiting the EU need protection. It is essential to recognise crime and victims explicitly in the Strategy on Tourism.

A truly sustainable tourism strategy must integrate safety and protection mechanisms to prevent and respond to crime affecting tourists, migrant workers in tourism-related industries, and local communities. Crime (including theft, violence, trafficking, exploitation, and harassment) can have a direct impact on the attractiveness, reputation, and long-term viability of tourism destinations.

In this contribution, we outline the **current challenges** facing tourists who fall victim to crime, the **legal and policy gaps** within the EU framework, and the urgent need for **better integration of victim support services into the Tourism Strategy.** Our key recommendations focus on prevention, preparedness, victim-centred responses, and cross-border cooperation to ensure that Europe's tourism model is not only competitive and resilient but safe and rights-based. To be more precise and succinct, we encourage the European Commission to incorporate victims' rights into the sustainable tourism strategy by:

- Strengthening cross-border cooperation to ensure access to safe justice and inclusive all-crime victim support services for all tourists who fall victim to crime in another Member State.
- Promoting **inclusive and safe tourism environments**, including safe public spaces and responsible tourism practices that reduce vulnerability to crime and exploitation.
- Ensuring that tourism workers, particularly seasonal and migrant workers, are **protected** against abuse and exploitation and have access to information, legal remedies, and support services.

Background

The EU's current tourism framework has prioritised sustainability, competitiveness, and digitalisation. However, it has largely overlooked personal security, the rights of tourists as potential victims of crime, and their protection in the context of large-scale events or other emergencies.

Victims have the **fundamental right to be informed that they can access generic support systems**, regardless of their nationality or length of stay. Raising awareness of these services is essential, as timely information empowers victims to seek assistance for emotional, practical, or financial needs. Clear visibility of such support, through police, tourist offices, accommodation providers, and online resources, ensures that **no victim is left isolated simply because they are unfamiliar with local systems**.



Guaranteeing this right strengthens trust in host communities, reassures travellers, and aligns tourism policy with broader EU commitments to victim protection.

Despite clear risks, many visitors remain unaware of their rights or of available support services, and there are no formal protocols to ensure immediate referral to specialist victim support. In practice, this often depends on the discretion of individual police officers, which leaves some tourists without access to help. Likewise, many victims do not receive a written acknowledgement of their incident, which is essential for accessing consular support or replacing stolen documents. Tourists can also face acute financial hardship when money, cards, or ID are stolen, with little structured assistance available to prevent them from being stranded.

Tourism, Crisis Response and Victim Preparedness

In recent years, the tourism landscape has changed significantly with climate-related disasters, pandemics, terrorist attacks, geopolitical tensions, and increased mobility, all requiring more robust crisis management and social resilience strategies. Yet, there is little infrastructure in place to ensure that potential cross-border victims, both EU citizens abroad and tourists within the EU, can access timely information, effective support, and their rights in practice.

The new strategy is therefore a crucial opportunity to correct these omissions by explicitly including **the** rights, protection, and support needs of tourists as part of a holistic vision for safe and resilient tourism across the EU.

Tourism is increasingly impacted by crises, varying from natural disasters and pandemics to geopolitical tensions and terrorism. An effective EU tourism strategy should:

- Integrate emergency response protocols, under the umbrella of comprehensive national victim support frameworks, that include immediate and long-term victim support.
- Ensure coordination between tourism stakeholders and national victim support organisations during crises.
- Facilitate training for hospitality and tourism staff on how to assist victims in crisis situations, putting emphasis on safety tipsheets, empathy, resilience and effective communication.

Victims' Rights and Inclusive Support Services to create an Accessible Tourism for all

Tourists who become victims of crime often face unique and compounded difficulties: language barriers, unfamiliarity with local systems, financial difficulties, lack of access to support services, feelings of isolation, and limited ability to remain in the country for legal proceedings or recovery. Many victims, including people with disabilities, survivors of gender-based violence, or victims of hate crimes, may face barriers in accessing tourism services. On top of this, navigating fragmented systems, from inadequate referrals to inconsistent information across authorities, can leave victims without clear pathways to the assistance they urgently need.

Under the EU Victims' Rights Directive, all victims of crime, regardless of nationality or residence status, are entitled to respectful treatment, protection, support, and access to justice. However, implementation for cross-border victims remains weak and inconsistent across Member States. Tourists, by nature, are disadvantaged in receiving the support they need following a crime.

To support tourists who become victims of crime, the following is integral:



- Trust and belief response: tourists must feel reassured that if they suffer crime, they will be listened to, believed, and supported.
- The financial impact ("money"): tourists who become victims often face unplanned expenses, such as medical costs, legal fees, additional accommodation or repatriation. Assistance structures must therefore address not only immediate safety but also the financial consequences of victimisation.
- Visible systems and reassurance: clear systems and protocols visibly in place foster confidence and encourage victims to seek help. Demonstrating that safety and support measures are in place increases tourists' sense of security.

Additionally, sustainable tourism should include the angle of **social inclusion**, promoting accessibly and respect to democratic principles. Therefore, we encourage the European Commission to:

- Promote accessible and inclusive tourism services that account for the needs of vulnerable populations, who are prone to the emergence of (transnational) organised crime.
- Support SMEs and destination management organisations in applying victim-sensitive and victim-centric approaches that improve **trust**, **safety**, **and inclusivity**.

Legal and Policy Gaps

While the EU Victims' Rights Directive and other justice-related instruments provide a foundational framework, there **remains no binding mechanism to ensure tourists are adequately protected or supported** when they become victims of crime while travelling.

Several critical gaps persist:

- **Limited coordination** between tourism authorities and victim support providers at both local and EU levels.
- **Restricted access** to victim support services for non-resident victims, often due to lack of information, language barriers, or unclear entitlements.
- **Insufficient data collection** on crimes affecting tourists, making it difficult to assess risks or inform early intervention and protective measures.
- Weak cross-border referral mechanisms and unclear jurisdictional responsibilities for providing ongoing support post-incident and upon return home.

These are not theoretical shortcomings but major challenges in practice. The fragmented implementation of existing EU frameworks not only jeopardizes the rights and recovery of victims but also **erodes trust in the safety and reliability of European destinations**. Without concrete mechanisms for coordination, access to support, and cross-border referrals and continuity of care, the EU falls short of its vision for safe, resilient, and rights-based tourism. Addressing these implementation gaps is therefore central to building a credible and effective tourism strategy.

The upcoming revision of the Victims' Rights Directive presents an important opportunity to address some of these structural gaps. However, it is essential that the Sustainable Tourism Strategy also explicitly recognises and reinforces these needs within its own scope. Only by integrating safety, victim support, and rights protection into the tourism agenda can the EU ensure a truly sustainable and inclusive tourism sector.

As the EU moves to **revise the Package Travel Directive** to strengthen consumer protection and simplify travel arrangements, it is vital to ensure that this modernisation embeds the rights and protections of



tourists who may become victims of crime or crisis. Building a competitive, prosperous, and resilient tourism sector must go hand in hand with safeguarding those who participate in it. Tourists are not just consumers; they are individuals whose safety, dignity, and well-being must be guaranteed as part of any responsible and democratic travel framework. By integrating preparedness, prevention, and responsive victim support into the Directive, the EU can ensure that holidays and travel remain periods of joy and unforgettable memories, not moments of distress left unaddressed. Embedding these protections reflects a Union that not only fosters economic growth but also stands by its people, reinforces public trust, and enhances the democratic value of tourism policy.

Policy coherence and Mainstreaming Victims' Rights

VSE welcomes the strategy's goal to create stronger links between tourism and other policy sectors. We strongly encourage alignment with the EU Strategy on Victims' Rights, the European Pillar of Social Rights, and the Charter of Fundamental Rights. Mainstreaming victims' rights in tourism policy contributes to social sustainability, enhances resilience, and upholds the values of the EU.

Good Practices related to Tourism and Large-Scale Events

In recent years, several promising examples have emerged across the EU that showcase how a victim-centred approach can be meaningfully integrated into the tourism ecosystem. These practices highlight the value of cooperation across sectors, ensuring safety, preparedness, and adequate responses to potential incidents.

World Youth Day 2023 – APAV Portugal

One notable example is the work of APAV (Associação Portuguesa de Apoio à Vítima) during World Youth Day 2023, which gathered millions of participants in Portugal. APAV's involvement illustrates how placing victims' perspectives and needs at the centre of large-scale event planning not only enhances overall safety, but also guarantees that, should an incident occur, victims have access to specialised support for as long as they need it.

To understand how this support system was set up, it is useful to look at the different phases of preparation, starting with **pre-planning and moving through to measures during the gathering itself**. Given the nature of the event, the first step was to **anticipate potential challenges** that could affect participants, with particular attention to the fact that the gathering included a large number of international attendees.

Once the main challenges had been identified, the next step was to design a coherent plan based on a number of strategic pillars, among which prevention and training were at the core of this work. Particular attention was given to addressing violence in large-scale events and its consequences for victims, while also ensuring that law enforcement, event staff, and volunteers received training on how to interact sensitively and appropriately with victims. Communication efforts were carefully designed to balance the need for timely information with the importance of avoiding panic, aiming to promote both personal safety and awareness of specialised support services. Information was provided in five official languages to reach the wide variety of participants, and messages were coordinated with law enforcement to ensure consistency.

Safety advice was shared with participants, and volunteers working in the World Youth Day call centre were given specific training to support victims through helplines. On-site prevention and visibility were also central. The approach followed was "see and be seen", ensuring that APAV maintained a visible and accessible presence throughout the event. Practical safety tips were made available, while participants were reminded that victim support services were close at hand should they need them.



The provision of specialised support required careful preparation of human and material resources, with staff members trained to deliver emotional, psychological, practical, social, and legal support. Services were made available through multiple channels, including face-to-face contact or mobile teams positioned near key venues, alongside helplines and online platforms.

The planning process also relied on strong stakeholder engagement and coordination, both via national and international referral pathways. Partnerships were established with internal security and civil protection authorities, embassies, medical emergency services, law enforcement bodies, and other victim support organisations.

Tourist SOS - Ireland

Another prominent example is Tourist SOS¹, a support service for tourist in Ireland. In 2024, assisted 2,111 International visitors from 88 countries around the world. They offer the following services:

1. Emotional Support and Practical Assistance

- a. Open 7 days a week for support and assistance staff and volunteers with language skills. Language support is also offered through interpreting service.
- b. <u>www.touristsos.ie</u> is available 24/7 with information and guidance numbers for cancelling bank cards, links to international embassies etc available in multiple languages.

2. Documentation Support

- a. Assistance with filing Garda (police) and insurance reports
- b. Support obtaining temporary documentation if passports or visas are stolen/lost.
- c. Guidance on navigating the judicial system

3. On-the-Ground Assistance

- a. Partnering with local services (Gardaí, local transport agencies, airlines, consulates).
- b. Arranging transport, meals, accommodation, or medical help in emergencies.

4. Education and Prevention

- a. Presentations to stakeholders Gardaí, embassies and the tourism industry on best practices in assisting distressed tourists.
- b. Distribution of collateral to stakeholders posters, postcards, stickers, safety tips

5. Target Audience

- a. International tourists (business or leisure)/students studying abroad/temporary workers.
- b. Partnering organisations (Gardai, embassies, tourism industry)

Tourist SOS deals with all categories of crime from thefts to serious assaults. However, in general, tourists are targeted for opportunistic theft, and this is reflected in that ninety-six percent of tourist crime victims seeking assistance in 2024 were victims of theft related incidents.

Cruise Victims International

Cruise tourism has experienced significant growth over the past decades, with an expected 37.7 million cruise passengers projected in 2025.² While marketed as a safe leisure space, research and advocacy groups highlight persistent concerns around crime at sea. Cruise Victims International showcase victims' testimonies on a range of crimes that they experienced when on cruises, including sexual assault, deaths, missing persons, and violence, underscoring the human impact of crime on cruise

¹ See: https://www.touristsos.ie/

² Cruise Lines International Association. (2025, May 22). New 2025 State of the Cruise Industry report. Cruise Lines International Association. https://cruising.org/news/new-2025-state-cruise-industry-report-shows-cruising-vibrant-tourism-sector-growing-steadily



ships.³ NGOs and legal commentators argue that these crimes are often underreported or obscured, as the industry's self-reporting obligations under the Cruise Vessel Security and Safety Act (CVSSA) cover only specific categories.⁴

For victims, this underreporting translates into limited recognition, lack of access to justice, and inadequate support while on-board. These challenges point to the need for stronger protections, transparency, and advocacy to ensure victims are not silenced within the growing cruise tourism sector.⁵

Key Recommendations

For the EU's Sustainable Tourism Strategy to be effective, victim support must be fully integrated into the tourism ecosystem. This means ensuring accessible multilingual information, clear emergency protocols, and strong cross-border referral systems to local victim support organisations.

Prevention and preparedness are equally crucial. Investments in safer infrastructure, tourist awareness campaigns, and training for staff in key tourism hubs can reduce risks and guarantee swift, sensitive responses when incidents occur. A rights-based and resilient approach to tourism should prioritise safety, prevention, access to justice, and coordinated cross-border responses when incidents occur

To ensure a resilient and competitive tourism sector, VSE offers the following recommendations:

1. Integrate Victim Support Across the Tourism Ecosystem

- Ensure accessible, multilingual information for tourists on how to access victim support services, both online and at key tourism touchpoints (airports, hotels, transport hubs).
- Develop **clear emergency response protocols** that include referral to local victim support organisations.
- Establish and maintain **strong cross-border referral mechanisms** to guarantee continuity of support after a tourist has returned home.

2. Invest in Prevention and Preparedness

- Increase investment in safe tourism infrastructure, particularly in high-traffic or high-risk areas.
- Launch targeted **awareness campaigns** for tourists on how to stay safe and what to do if they are victimised.
- Provide **specialised training** to tourism staff (e.g. hotel, transport, hospitality) on how to recognise, respond to, and refer victims in a sensitive and informed manner.

3. Strengthen the EU Framework for Victim Protection in Tourism Contexts

- Reinforce implementation of the Victims' Rights Directive and related instruments, ensuring they apply equally to:
 - o Tourists victimised within the EU.
 - o EU citizens victimised while travelling abroad.

Federal Bureau of Investigation. (2023, May 5). Ensuring safety at sea. Federal Bureau of Investigation.

https://www.fbi.gov/news/stories/ensuring-safety-at-sea

³ See: <u>https://internationalcruisevictims.org/victim-stories/</u>

⁴ Cruise Law USA. (n.d.). Crimes on cruise ships believed to be underreported. Cruise Law USA. https://www.cruiselawusa.com/articles/cruise-ship-passenger-injuries-death-claims/crimes-on-cruise-ships-believed-to-be-underreported/

⁵ See: https://internationalcruisevictims.org/



- Mainstream victim support and safety within all pillars of the Sustainable Tourism Strategy, recognising them as core components of tourism resilience, not peripheral concerns.
- Establish or support emergency financial aid mechanisms for victims who may be stranded following a crime (e.g. assistance with temporary accommodation, food, or repatriation).

4. Enhance Cross-Border and Intersectoral Cooperation

- Facilitate **cross-border assistance and cooperation** between victim support services, law enforcement, consular services, and tourism authorities.
- Mandate collaboration between tourism ministries, local governments, destination management organisations (DMOs), law enforcement, and victim support NGOs to develop shared safety protocols and referral systems.
- Standardise the provision of written incident reports, available in multiple languages, to help victims access support and legal remedies.

5. Improve Visibility, Trust, and Accessibility of Support Services

- Ensure **high visibility of support services** through dedicated emergency contact points and clearly signposted referral pathways.
- Create systems that visibly demonstrate a **commitment to victim care and support**, which can also enhance the reputation and competitiveness of destinations.
 - o E.g. the APAV victim support system during World Youth Day in Lisbon or cruise ship victim support initiatives.

6. Strengthen Monitoring, Data, and Funding Frameworks

- Include victim safety and support indicators in EU tourism assessments and funding programmes.
- Establish a mechanism for **EU-wide data collection** on crimes against tourists, their impacts, and access to justice and support.
- Use this data to inform prevention strategies, improve service delivery, and guide investment priorities at both EU and national levels.

If the EU is to deliver a tourism strategy that is not only competitive and green, but also inclusive, trustworthy, and rights-based, it must actively address the risks of crime and the rights of those affected. Safety and victim support are prerequisites for sustainable tourism, and their full integration into the new strategy will benefit individuals, communities, and the sector as a whole.

Role of Victim Support Europe

Victim Support Europe is uniquely positioned to support the implementation of these recommendations. As the leading European umbrella organisation for national victim support services, VSE brings together a network of NGOs and service providers that deliver frontline support to victims of crime in almost every EU Member State. Through our coordinated work, we:

- Provide **direct access to local support providers** across Europe, ensuring tailored, culturally competent assistance.
- Coordinate cross-border assistance and referral services, allowing tourists to continue receiving support upon returning home.
- Provide **training**, **research**, **and policy advice** on victim rights, trauma-informed approaches and service standards.



Monitor and advocate for the effective implementation of EU victims' legislation. Generic
victim support services that assist all victims of crime regardless of the type of offence are a
vital, yet often overlooked, component of a resilient and inclusive tourism ecosystem.

Tourists who fall victim to crime or traumatic incidents may experience shock, confusion, and disorientation, compounded by language barriers and lack of local knowledge. Whether the harm results from theft, assault, hate crime, harassment, gender-based violence, or large-scale crises such as terrorist attacks or natural disasters, tourists need immediate, empathetic, and competent support.

Generic victim support organisations are uniquely equipped to meet these needs. They:

- Serve as a **single point of access** for all victims, regardless of the type of crime.
- Provide **confidential emotional support, practical assistance**, legal information, and referrals to specialised services.
- Are designed to be **flexible**, **rapid-response** services, ideal for short-term visitors who may not be able to navigate complex systems or wait for specialised care.
- Offer support in **multiple languages** and formats, helping overcome common accessibility barriers.

By strengthening the links between generic victim support and tourism infrastructures, such as police, embassies, tourism offices, and event organisers, the EU can ensure that all tourists who experience harm receive timely, professional, and empathetic assistance, in line with their rights and dignity. By embedding victim support into these systems, the EU can guarantee that all tourists have timely access to professional, rights-based, and trauma-informed assistance. This not only upholds the EU's commitment to fundamental rights but also enhances the credibility, attractiveness, and resilience of its tourism destinations.

Victim Support Europe stands ready to support this effort through its extensive network, expertise, and partnerships, ensuring that no victim is left behind, no matter where in Europe they are.

Conclusion

To be truly effective, the new EU Tourism Strategy must go beyond economic growth and environmental sustainability to embrace **safety, rights, and inclusivity** as core pillars of a competitive and resilient tourism sector.

This means recognising that **crime prevention**, **crisis preparedness**, **and comprehensive victim support are not ancillary concerns**, but essential components of long-term tourism planning - especially in a rapidly evolving global context marked by **increased mobility**, **mass tourism**, **large-scale events**, **climate emergencies**, **and geopolitical uncertainty**.

Integrating generic victim support services into tourism systems ensures that all victims, regardless of nationality, residence, or the nature of the incident, have access to timely, dignified, and professional assistance. Stronger cross-sector cooperation, clear referral pathways, and training for tourism actors will enhance not only the safety of travellers but also the overall trust, reputation and social sustainability of European destinations.

The moment to act is now. With the upcoming revision of the Victims' Rights Directive and the development of this new Tourism Strategy, the EU has a **unique opportunity to lead globally** by placing **people and their rights at the centre of tourism policy**.

A new forward-looking EU Tourism Strategy must reflect these realities and place victim protection and support at the heart of its vision for a sustainable, competitive, and human-centred tourism model.



Victim Support Europe is committed to supporting the European Commission and its partners in shaping a tourism sector that is not only competitive and climate-resilient but also inclusive, safe, rights-based, and aligned with EU values. We stand ready to support further dialogue on how the strategy can integrate victim-centred perspectives, and thus to ensure **no victim is left behind** — **at home or abroad**.

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.