



# Victim Support Europe Submission to the European Commission to Enhance the Strategy for the Rights of Persons with Disabilities up to 2030

February 2026

## Introduction

Approximately 107 million people, or one in four adults in the EU have a disability<sup>1</sup>. Even though persons with disabilities should be protected and treated as equals under international, European, and national law, the reality is that many individuals still experience discrimination or unfair treatment because of it. In fact, a 2023 survey found that 54% of people with disabilities feel discriminated against<sup>2</sup>.

In March 2021, the European Commission adopted the European Disability Strategy 2021-2030 (hereafter 'the Strategy') with the aim of promoting equal opportunities and full inclusion for persons with disabilities in Europe, and around the world<sup>3</sup>. The Strategy is also part of the implementation of the European Pillar of Social Rights<sup>4</sup>, and in particular principle 17 on the inclusion of persons with disabilities.

Victim Support Europe (VSE) welcomes the renewal of the EU Strategy for the Rights of Persons with Disabilities until 2030. While legal frameworks recognise that persons with disabilities are entitled to the full enjoyment of their rights, in practice, this remains far from the reality. In situations of victimisation where persons with disabilities participate in criminal proceedings, these structural shortcomings become even more pronounced. Accessibility gaps, inadequate procedural safeguards, and limited availability of specialised support can undermine their effective participation and weaken the protection of their fundamental rights. Strengthening these rights requires a criminal justice response that is fully accessible, trauma-informed, and responsive to intersectional discrimination.

VSE stands ready to contribute to the Strategy's effective implementation by highlighting the challenges faced by persons with disabilities, especially those with intersectional vulnerabilities and/or lived experiences of victimisation. In essence, VSE supports an enhanced EU Strategy that is rights-based, adequately resources, and caters for the full inclusion of persons with disabilities, through which their equal participation in society is guaranteed and can contribute to resilient and democratic communities. Addressing violence against persons with disabilities is essential not only for rights protection but also for trust in institutions and democratic resilience

## Background

### The current Strategy

The current 10-year Strategy (i.e. building on the results of the previous European Disability Strategy 2010-2020<sup>5</sup>) for people with disabilities has made many strides. The framework aligns with the UN

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<sup>1</sup> Council of the European Union. (2025). Disability in the EU: facts and figures [Infographic]. Consilium.europa.eu. <https://www.consilium.europa.eu/en/infographics/disability-eu-facts-figures/>

<sup>2</sup> Ibid.

<sup>3</sup> European Commission (2021). Union of Equality: Strategy for the Rights of Persons with Disabilities 2021-2030. Retrieved from: <https://op.europa.eu/en/publication-detail/-/publication/3e1e2228-7c97-11eb-9ac9-01aa75ed71a1/language-en>.

<sup>4</sup> [Interinstitutional Proclamation on the European Pillar of Social Rights \(2017/C 428/09\)](https://eur-lex.europa.eu/eli/reg/2017/428/oj)

<sup>5</sup> European Commission (2010). European Disability Strategy 2010-2020: A Renewed Commitment to a Barrier-Free Europe. Retrieved from: <https://eur-lex.europa.eu/>.

Convention on the Rights of Persons with Disabilities (UN CRPD<sup>6</sup>), which the EU ratified in 2010, it recognises violence and discrimination against people with disabilities, there is a good focus on accessibility and inclusion as well as incorporating an intersectional lens.

However, there have been several limitations with the Strategy thus far; among some, the lack of focused commitments targeting victim support services, justice processes, or protections for victims of crime with disabilities. This includes limited attention to access to justice, victim support services, and procedural safeguards for victims of crime with disabilities.

Implementation of the strategy has been unequal and fragmented, leaving persistent gaps across Member States and between people with and without disabilities<sup>7</sup>. Monitoring the implementation of already existing legislation and policies must be a continuous effort in the coming years, through better coordination among the UNCRPD monitoring frameworks at national and EU level.

There remains a need for clear indicators, accountability mechanisms, victim-centred measures, and systematic disaggregated data collection as well as a dedicated focus on addressing and supporting victims with disabilities who experience violence and discrimination both inside institutions and in wider society<sup>8</sup>. Structural barriers continue with limited ability for people with disabilities to enjoy the full scope of their rights in the EU, with participation not being fully accessible or representative.

VSE is aware that the European Commission has called on the Fundamental Rights Agency to research violence, abuse and torture in institutions. When enhancing the current Strategy, it is essential that this step is included with clear indicators and measures to support the victims, seek justice for the harm they experienced, and to bring forward methods to end all forms of violence against people disabilities<sup>9</sup>. Furthermore, better disability mainstreaming is needed in other EU initiatives (e.g. EU Strategy for Victims' Rights).

### Victims' Rights Directive

According to the **EU Fundamental Rights Agency (FRA)**, persons with disabilities experience **higher rates of violence, harassment, and abuse** than persons without disabilities<sup>10</sup>. Women and children with disabilities face **particularly elevated risks**<sup>11</sup>.

The Victims' Rights Directive (VRD)<sup>12</sup> explicitly embeds people with disabilities throughout, making particular note under articles related to non-discrimination and equal access, information and

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<sup>6</sup><https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-persons-disabilities>

<sup>7</sup> Birtha, M., Sandu, G., & Miazga, E. (2024). The EU strategy for the rights of persons with disabilities 2021–2030: Achievements and perspectives (Policy Department for Citizens' Rights and Constitutional Affairs, European Parliament. PE 767.095) [Briefing]. European Parliament. [https://www.europarl.europa.eu/RegData/etudes/BRIE/2024/767095/IPOL\\_BRI%282024%29767095\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2024/767095/IPOL_BRI%282024%29767095_EN.pdf)

<sup>8</sup> European Union Agency for Fundamental Rights. (2025). Protecting persons with disabilities from violence in institutions [Infographic]. FRA – European Union Agency for Fundamental Rights. <https://fra.europa.eu/sq/publications-and-resources/infographics/protecting-persons-disabilities-violence-institutions>

<sup>9</sup> European Network on Independent Living. (2025). Update to the shadow report on the implementation of the UN Convention on the Rights of Persons with Disabilities in the European Union [PDF]. European Network on Independent Living. <https://enil.eu/wp-content/uploads/2025/01/ENIL-Shadow-report--website-version.pdf>

<sup>10</sup> <https://fra.europa.eu/en/publication/2021/fundamental-rights-survey-crime>

<sup>11</sup> FRA. (2025). <https://fra.europa.eu/en/news/2025/systemic-change-needed-end-violence-against-people-disabilities-institutions>

<sup>12</sup> European Union. (2012). Directive 2012/29/EU of the European Parliament and of the Council of 25 October 2012 establishing minimum standards on the rights, support and protection of victims of crime, and replacing Council Framework Decision 2001/220/JHA. Official Journal of the European Union, L 315, 57–73. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32012L0029>

communication, individual needs assessments, special protections, access to support services and justice, prevention of secondary victimisation as well as the training of professionals. In doing so, the Directive recognises that victims with disabilities may face heightened barriers and require tailored safeguards to ensure the effective exercise of their rights. Despite these clear legal obligations, implementation of the VRD for victims with disabilities remains uneven and insufficient across Member States.

Article 22, in particular, establishes the obligation to carry out an individual assessment to identify victims' specific protection needs. It expressly recognises victims with disabilities as a group likely to benefit from special measures during criminal proceedings, especially in relation to their effective participation and the prevention of secondary victimisation arising from such engagement with the justice system.<sup>13</sup> In practice, inconsistent or superficial individual needs assessments significantly undermine victims' effective participation and increase the risk of secondary victimisation.

The VRD is currently undergoing a revision and is expected to be adopted in 2026. The accompanying [Explanatory Memorandum](#) acknowledges persistent implementation gaps, including that only 26% of persons with intellectual disabilities receive information in an appropriately accessible format<sup>14</sup>. It further identifies shortcomings in key areas such as the quality of individual needs assessments, the availability of specialised victim support services, effective participation in criminal proceedings, and access to compensation. FRA<sup>15</sup> and European Commission<sup>16</sup> monitoring repeatedly highlight that individual needs assessments are **inconsistently applied**, specialised victim support services are **unevenly available** and training of professionals on disability-specific needs is **insufficient**.

Without explicit alignment, there is a risk that victims with disabilities continue to fall between policy frameworks, weakening enforcement, monitoring, and accountability.

The revised Victims' Rights Directive must be fully and explicitly reflected in the enhanced EU Strategy for the Rights of Persons with Disabilities to ensure coherence, effective implementation, and accountability, and to guarantee that victims with disabilities can access justice, support, and protection on an equal basis across the Union. Mainstreaming disability rights and victims' rights across EU policies reflects accessibility and inclusion and will strengthen monitoring and accountability, and will elevate independent authorities.

## [UN Convention on the Rights of Persons with Disabilities](#)

The UN CRPD establishes a **binding human rights framework** that requires States not only to prohibit discrimination but to **proactively remove structural, procedural, and attitudinal barriers** that prevent persons with disabilities from accessing protection and justice on an equal basis with others. Under

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<sup>13</sup> LITIGATE Project. (2024). Strategic Litigation Guidebook. Available here: [https://victim-support.eu/wp-content/uploads/2024/11/LITIGATE-GuideBook\\_FINAL.pdf](https://victim-support.eu/wp-content/uploads/2024/11/LITIGATE-GuideBook_FINAL.pdf)

<sup>14</sup> European Commission. (2023, July 12). *Proposal for a Directive of the European Parliament and of the Council amending Directive 2012/29/EU establishing minimum standards on the rights, support and protection of victims of crime, and replacing Council Framework Decision 2001/220/JHA* (COM(2023) 424 final; CELEX 52023PC0424). EUR-Lex. <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52023PC0424>

<sup>15</sup> [https://fra.europa.eu/sites/default/files/fra-2015-victims-crime-eu-support\\_en\\_0.pdf](https://fra.europa.eu/sites/default/files/fra-2015-victims-crime-eu-support_en_0.pdf)

<sup>16</sup> [Commission Staff Working Document on the evaluation of Directive 2012/29/EU of the European Parliament and of the Council of 25 October 2012.](#)

Article 16 of the UN CRPD, there are specific measures to ensure people with disabilities have freedom from exploitation, violence and abuse. Article 12 and 13 relate to equal recognition before the law and access to justice respectively. These Articles specifies intersectional needs in relation to gender, age as well as accessibility for those with additional mobility needs, communication and information sharing in disability-friendly means with the provision of reasonable accommodations.<sup>17</sup>

Importantly, the Convention recognises that **failure to provide accessibility and reasonable accommodation constitutes discrimination**, particularly where it results in exclusion from justice, protection, or support mechanisms. This has direct relevance for victim support systems and judicial processes, where inaccessible environments, communication barriers, and insufficiently trained professionals continue to undermine victims' ability to report violence, participate in proceedings, and obtain remedies.

The UN CRPD General Comment no. 2, paragraph 37 explicitly states:

*“There can be no effective access to justice if the buildings in which law-enforcement agencies and the judiciary are located are not physically accessible, or if the services, information and communication they provide are not accessible to persons with disabilities (art. 13). Safe houses, support services and procedures must all be accessible in order to provide effective and meaningful protection from violence, abuse and exploitation to persons with disabilities, especially women and children (art. 16). Accessible environment, transportation, information and communication, and services are a precondition for the inclusion of persons with disabilities in their respective local communities and for them to have an independent life (art. 19).”<sup>18</sup>*

This reaffirms the need to mainstream and include people with disabilities rights across victim support and judicial systems. These needs must be incorporated, monitored and reviewed based on distinct indicators in the Strategy.

The explicit reference in General Comment No. 2 to accessible safe houses, support services, and procedures underscores that protection from violence cannot be achieved without **systemic accessibility and coordination across sectors**. For victims with disabilities (especially women and children) access to justice and protection must be understood as a **continuum**, encompassing prevention, early identification, support, participation in proceedings, and recovery.

Accordingly, the enhanced EU Strategy for the Rights of Persons with Disabilities should operationalise these obligations by embedding **clear indicators, monitoring mechanisms, and accountability frameworks** to assess whether victim support services and justice systems are genuinely accessible and inclusive. Mainstreaming disability rights across victims' rights and justice policies is essential to ensure that protections are not merely formal but **effective, rights-based, and responsive to lived realities**.

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<sup>17</sup> United Nations. (2006). Convention on the Rights of Persons with Disabilities (General Assembly resolution A/RES/61/106, adopted 12 December 2006). Office of the High Commissioner for Human Rights. <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-persons-disabilities>

<sup>18</sup> Committee on the Rights of Persons with Disabilities. (2014). General comment No. 2 (2014) on Article 9: Accessibility (CRPD/C/GC/2). United Nations. <https://documents.un.org/doc/undoc/gen/g14/033/13/pdf/g1403313.pdf>

## Impact of crime on persons with disabilities

Persons with disabilities are disproportionately affected by crime, both in terms of prevalence and severity of impact. This heightened vulnerability stems not from disability itself, but from systemic barriers, social exclusion, and insufficient protection mechanisms. As a result, persons with disabilities face a disproportionately high risk of becoming victims of crime, violence, and abuse, with particularly severe impacts on women, older persons, and children with disabilities. Across the EU, **17% of persons with disabilities report having experienced violence, compared with 8% of people without disabilities**<sup>19</sup>. This heightened exposure reflects not only individual vulnerability but also systemic failures in protection, prevention, and access to justice. Disproportionality is not incidental; it reflects cumulative failures in prevention, safeguarding, accessibility, and accountability across social, care, and justice systems; higher victimisation is a **predictable outcome of systemic failure**, not individual risk.

As statistics show, the intersection of gender and disability further compounds this risk. In 2024, women with disabilities outnumbered men with disabilities in every EU Member State. On average, **26.2% of women in the EU have a disability, compared with 21.5% of men**<sup>20</sup>. Additionally, research shows that women and girls with disabilities face **elevated risks of sexual and domestic violence**, including within care settings, older persons with disabilities are more exposed to **neglect and financial exploitation**, particularly where dependency increases, and children with disabilities are **significantly overrepresented among victims of abuse in institutional and segregated settings**.

Disability intersects with every aspect of a person's life, and despite legislative progress, persistent gaps in access to justice and inclusion continue to undermine equality. Crime against persons with disabilities cannot be understood in isolation from broader structural discrimination. Persistent violations are present across key areas of life, including, for instance, discriminatory employment practices, denial of inclusive education, continued institutionalisation, and the failure to provide reasonable accommodations for persons with intellectual and psychosocial disabilities. These violations create conditions of dependency and isolation, which significantly increase the risk of victimisation and reduce the likelihood that crimes are reported, investigated, and prosecuted.

### Challenges in reporting and impact of the crime

Persons with disabilities face an increased risk of certain forms of crime, including violence, hate crime, sexual abuse, financial exploitation, neglect, and institutional abuse, including documented risks of under-reporting and lack of access to safe justice. FRA has documented **systemic risks of violence, abuse, and neglect** in institutional settings for persons with disabilities<sup>21</sup>. Institutional and segregated settings remain environments of heightened risk, where power imbalances, lack of oversight, and dependency on caregivers significantly increase exposure to abuse while simultaneously suppressing reporting.

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<sup>19</sup> Council of the European Union. (2025). Disability in the EU: facts and figures [Infographic]. Consilium.europa.eu. <https://www.consilium.europa.eu/en/infographics/disability-eu-facts-figures/>

<sup>20</sup> Council of the European Union. (2025). Disability in the EU: facts and figures [Infographic]. Consilium.europa.eu. <https://www.consilium.europa.eu/en/infographics/disability-eu-facts-figures/>

<sup>21</sup> <https://fra.europa.eu/en/publication/2018/institutions-community-living-persons-disabilities-perspectives-ground>

In the event of a crime being committed, reporting remains significantly low, due to a combination of structural and systemic barriers. The main reasons include:

- Communication barriers and lack of accessible reporting mechanisms
- Fear of retaliation, especially when perpetrators are caregivers, family members, or support staff
- Lack of trust in law enforcement and justice systems
- Previous experiences of disbelief, dismissal, or secondary victimisation

These barriers contribute to a cycle of invisibility, where crimes remain unreported, perpetrators unaccountable, and systemic risks unaddressed.

On top of this, the impact of crime on persons with disabilities is often compounded and long-lasting. Beyond the immediate physical harm, victims frequently experience severe psychological distress and trauma, a loss of independence accompanied by increased reliance on support, and disruption to their education, employment, and participation in the community. When reasonable accommodations and appropriate victim support are not provided, the criminal justice process itself can become an additional source of harm, exacerbating the vulnerability of those affected and further impeding their access to justice.

### Barriers in access to justice

Persons with disabilities often face multiple and intersecting barriers throughout the justice process, which can significantly hinder their ability to report crimes, participate effectively in proceedings, and obtain redress. Physical inaccessibility of police stations, courts, and information is frequently compounded by the absence of procedural accommodations, such as sign language interpretation, easy-to-read materials, or the provision of support persons. These challenges are further intensified by limited awareness and understanding of disability among the officials coming into contact with the victim, which can result in inadvertent bias, disbelief, or procedural delays.

Together, these barriers do more than create practical difficulties; they risk undermining the fundamental right of persons with disabilities to equal recognition before the law and to effective access to justice. **These compounded impacts directly undermine the enjoyment of fundamental rights, including autonomy, participation in society, and equal access to justice, reinforcing long-term exclusion.** The barriers are rarely isolated; they accumulate across stages of the justice process, resulting in attrition, delayed proceedings, or complete exclusion from legal remedies.

### Victim-centred approaches

For persons with disabilities, victim-centred and safe justice approaches are not optional enhancements but prerequisites for the effective enjoyment of rights.

VSE's *Safe Justice for Victims of Crime*<sup>22</sup> paper argues for a fundamental shift in how justice systems treat victims, proposing “safe justice” as a holistic, needs-driven and rights-based approach. When implemented, it places victims’ safety, empowerment, participation and respect at the heart of justice. It emphasises removing barriers to reporting, ensuring meaningful information and participation, protecting from secondary harm, and supporting restoration beyond narrow legal remedies, grounded in victims’ lived experiences of harm and systemic obstacles.

Complementing this, the *National Framework for Comprehensive Victim Support*<sup>23</sup> paper sets out how EU Member States should organise victim support in a systematic, coordinated way that centres victims’ dignity and diverse needs. It calls for comprehensive systems where all actors – state, civil society and professionals across sectors – operate in a unified, long-term strategy to ensure accessible, respectful, safe and tailored support, underpinned by mechanisms like proactive referrals, needs assessments, quality standards and strategic oversight.

Accessibility for persons with disabilities is expressly included as an essential component of such support as well as in safe justice systems. Should both of these instruments be implemented widely, persons with disabilities would be able to enjoy their rights fully, navigate a complex system and emotionally challenging time with more ease and dedicated teams that would support them in a holistic and disability-friendly way.

Without accessible, coordinated, and disability-inclusive victim support and justice systems, crime against persons with disabilities will continue to be under-detected, under-addressed, and under-remedied, perpetuating harm and inequality.

## Recommendations

### 1. Ensure Equal and Effective Access to Victim Support and Safe Justice for Persons with Disabilities

The revised Strategy should explicitly guarantee **equal, non-discriminatory, and effective access to justice, protection, and victim support services for persons with disabilities**, including victims of violence, abuse, neglect, exploitation and discrimination. This requires the establishment of **systematic mechanisms to assess, adapt, and respond to diverse and individual support needs**, across criminal justice, civil justice, and administrative procedures.

To operationalise this commitment, the Strategy should require **systematic, individualised assessments** of support and protection needs and ensure that justice and support systems are equipped to adapt procedures accordingly.

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<sup>22</sup> Victim Support Europe, (2023). *Safe justice for victims of crime: Discussion paper*. Victim Support Europe. [https://victim-support.eu/wp-content/files\\_mf/1676903417SafeJusticeforvictimsofCrime\\_compressed.pdf](https://victim-support.eu/wp-content/files_mf/1676903417SafeJusticeforvictimsofCrime_compressed.pdf)

<sup>23</sup> Victim Support Europe, (2022). *National framework for comprehensive victim support* [Position paper]. Victim Support Europe. [https://victim-support.eu/wp-content/files\\_mf/1668091265NationalFrameworkforComprehensiveVictimSupport\\_compressed.pdf](https://victim-support.eu/wp-content/files_mf/1668091265NationalFrameworkforComprehensiveVictimSupport_compressed.pdf)

Accountability should be reinforced through strengthened EU-level data collection, monitoring, and evaluation, including the development of **clear EU-level indicators** on:

- Access to safe justice and procedural safeguards
- Protection from violence, exploitation, and abuse
- Availability, accessibility, continuity and quality of victim support services

Data should be **systematically disaggregated** by disability type, gender, age, institutional setting, and other relevant factors, enabling targeted, evidence-based policy responses.

## 2. Anchor the Strategy Firmly in Human Rights and the UN CRPD

The Strategy must be explicitly grounded in a **human rights-based approach**, aligned with the UN Convention on the Rights of Persons with Disabilities (UN CRPD). The **meaningful participation of persons with disabilities and their representative organisations** should be central to both the design, implementation and ongoing monitoring and evaluation of the Strategy.

To ensure impact, Strategy actions should be accompanied by:

- Clear **legal instruments and implementation pathways**
- Robust **accountability and monitoring mechanisms**
- Stronger **EU leadership** to drive consistent implementation of the UN CRPD across Member States and all levels of governance

The EU should reinforce its role as a **standard-setter**, ensuring coherence between disability strategies, victims' rights instruments, funding programmes, and international human rights commitments.

## 3. Close Gaps in Inclusion, Accessibility, and Protection

The Strategy should address persistent gaps in inclusion and accessibility through an **intersectional and victim-centred approach**, recognising how disability intersects with gender, age, migration status, poverty, and victimisation.

Particular attention should be paid to **access to safe justice**<sup>24</sup>, ensuring that legal systems, procedures, and support services are fully accessible, protective and responsive to different needs.

This includes:

- Accessible information and communication in multiple formats
- Reasonable accommodations throughout legal proceedings
- Trauma-informed, disability-sensitive and rights-based justice and support services

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<sup>24</sup> Victim Support Europe (2023). *Safe Justice for victims of crime*. Victim Support Europe. [https://victim-support.eu/wp-content/files\\_mf/1676903417SafeJusticeforvictimsofCrime\\_compressed.pdf](https://victim-support.eu/wp-content/files_mf/1676903417SafeJusticeforvictimsofCrime_compressed.pdf)

- Promote victim-centred models such as VSE's *Safe Justice for Victims of Crime* and the *National Framework for Comprehensive Victim Support*

These measures should be embedded as **systemic standards**, not optional adaptations.

#### 4. Ensure Sustainable Funding and Effective Implementation

The Strategy should be backed by **sustainable and ring-fenced funding**, including explicit commitments within the **Multiannual Financial Framework (MFF)** to support disability rights and inclusive victim support services. Investment should prioritise:

- Community-based and integrated support services
- Independent living solutions and deinstitutionalisation measures
- Support systems that prevent re-traumatisation and promote autonomy and participation

Funding allocations should be assessed against **measurable outcomes**, CRPD compliance, and long-term impact, rather than short-term project outputs.

#### 5. Mainstream Disability Rights and Victims' Rights Across EU Policies

Disability rights and victims' rights should be **systematically mainstreamed across all relevant EU policies, strategies, and legislative initiatives**, including justice, migration, digitalisation, and social policy. This requires:

- Strengthened **monitoring and accountability mechanisms**
- The active involvement of **independent equality, human rights, and victims' rights bodies**
- Mandatory **accessibility, victim-sensitive and inclusion criteria** across major EU initiatives, programmes, and legislative files
- Full integration of the Victims' Rights Directive (VRD) into the Strategy, ensuring that victims with disabilities can effectively **exercise their rights** in practice

Mainstreaming should move beyond policy intent to **verifiable implementation** (supported by indicators, reporting obligations, and oversight), ensuring that disability inclusion and victim protection are embedded across the EU policy landscape.

#### 6. Strengthen Professional Capacity and Training Across Systems

The Strategy should require **mandatory, ongoing training** for professionals across justice, law enforcement, social services, healthcare, and victim support systems on:

- Disability rights and reasonable accommodations
- Trauma-informed and victim-centred practice
- Preventing secondary victimisation and discrimination

Training should be developed in cooperation with persons with disabilities and their representative organisations and embedded in professional standards.

### 7. Address Risks in Institutional and Closed Settings

The Strategy should include **specific measures to prevent, detect, and respond to violence, abuse, and neglect in institutional and closed settings**, including:

- Enhanced monitoring and independent oversight
- Safe, accessible reporting and complaint mechanisms
- Protection against retaliation for victims and whistleblowers

Deinstitutionalisation and the development of community-based alternatives should be recognised as **preventive measures against victimisation**.

### 8. Improve Digital Accessibility and Safeguards in Justice and Support Systems

As justice and victim support services increasingly rely on digital tools, the Strategy should ensure:

- Digital accessibility by design
- Victim-sensitive digital evidence practices
- Safeguards against exclusion, surveillance, or re-traumatisation

Digitalisation should enhance, not undermine, access to safe justice for persons with disabilities.

### **Best practice**

The [FYDO project](#)<sup>25</sup> was an initiative to explore and promote the use of professionally trained facility dogs to support victims of crime throughout law-enforcement, justice and victim-support journeys. The project looked at the growing evidence that trained dogs can significantly reduce the stress and pressure on the victim, particularly those with additional vulnerabilities including people with disabilities. Research has shown that the trained dogs work best with victims with disabilities and victims of sexual and intimate partner violence.<sup>26</sup>

Facility dogs have been shown to:

- Support victims with communication barriers, including intellectual or psychosocial disabilities
- Help victims remain calm and focused during interviews and hearings
- Increase victims' sense of safety, dignity, and respect
- Enable more trauma-informed justice processes

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<sup>25</sup> <https://victim-support.eu/publications/facility-dogs-europe-fydo-using-facility-dogs-to-enable-victims-to-access-safe-justice/>

<sup>26</sup> Spruin, E., Mozova, K., Dempster, T., & Freeman, R. (2020). The use of facility dogs to bridge the justice gap for survivors of sexual offending. *Social Sciences*, 9(6), 96. <https://doi.org/10.3390/socsci9060096>

The ability to be a quite comfort and companion during these unfamiliar and high-stress situations can be an accessible and disability-friendly methodology of support.<sup>27</sup> Children and persons with disabilities may unexpectedly touch a dog in an intrusive manner or engage in unusual behaviour during the interview. A FYDO dog's training greatly decreases any adverse consequences resulting from such interaction<sup>28</sup>.

## 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.

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<sup>27</sup> Victim Support Europe. (2022). Canine support for victims of crime: Facility dogs in victim support [PDF]. Victim Support Europe. [https://victim-support.eu/wp-content/files\\_mf/1687792102FYDO\\_dog\\_Canine\\_support\\_for\\_victims\\_of\\_crime\\_final.pdf](https://victim-support.eu/wp-content/files_mf/1687792102FYDO_dog_Canine_support_for_victims_of_crime_final.pdf)

Victim Support Europe. (2022). Using facility dogs to enable victims to access safe justice: Policy paper [PDF]. Victim Support Europe. [https://victim-support.eu/wp-content/files\\_mf/1687791101FYDO\\_Policy\\_Paper\\_UsingFacilityDogstoEnableVictimstoAccesstoSafeJustice.pdf](https://victim-support.eu/wp-content/files_mf/1687791101FYDO_Policy_Paper_UsingFacilityDogstoEnableVictimstoAccesstoSafeJustice.pdf)

<sup>28</sup> Facility Dogs at Children's Advocacy Centers and in Legal Proceedings, Best Practices, Courthouse Dog Foundation, 2015, available at: <https://courhousedogs.org/wp-content/uploads/2017/02/Facility-Dogsat-CACs-Best-Practices-Final-2-18-15.pdf>