EU Strategy on Victims' Rights

Submission to the public consultation

Introduction

Building on the new provisions introduced by the recast Victims' Rights Directive, the forthcoming EU Strategy on Victims' Rights provides an opportunity to **strengthen the consistent implementation of victims' rights across the EU**. The focus should be not only on the rights established in law, but on ensuring that victims can actually exercise those rights in practice, regardless of where they live, the type of crime they have experienced, or their individual circumstances.

VSE's contribution to the public consultation will promote a **horizontal, all-crime and victim-centred approach**, by which the Strategy provides a guiding architecture for an integrated approach to victims' rights, **anchoring the victims' agenda within wider areas of EU policy**. For VSE, this is potentially the most distinctive contribution because it moves towards a system which questions *"wherever EU policy creates risks, responds to harms or affects people's access to rights, where do victims' rights fit?"*.

Our feedback draws on our strategic priorities (as set out in the VSE Strategy 2026-2030), the expertise of our members, as well as relevant input from governmental institutions and other key stakeholders. VSE believes that the new EU Strategy on Victims' Rights should be guided by the following commitments:

IMPLEMENTATION PRIORITIES	
Priority 1	**Existence, accessibility and quality of comprehensive national victim support systems** – The Strategy should help ensure that comprehensive national victim support systems exist in every Member State, are accessible to all victims of crime and provide timely, high-quality, needs-based support. These systems should be built on a nationwide network of generic victim support services, complemented by specialist services and integrated with other essential components of the victim support infrastructure, including: • **Generic victim support services** – ensure access to timely, free, high-quality and needs-based support for all victims of crime, regardless of the type of crime or their individual circumstances. These services should form the foundation of national victim support systems, ensuring nationwide coverage and providing information on victims' rights, initial assistance and effective referral pathways. • **Specialist support services** – ensure that victims with specific needs or who have experienced particular forms of crime can access specialised, tailored support, coordinated with generic victim support services. • **National victim support helplines** – ensure accessible entry points to victim support, including the rollout and effective functioning of 116 006 in every Member State.

	• **Court-based support services** – ensure that victims can access appropriate information, guidance and support throughout criminal proceedings. • **Multi-agency cooperation and referral mechanisms** – ensure effective coordination between victim support services, justice, law enforcement, healthcare, social services and other relevant actors, facilitating seamless referrals and continuity of support.
Priority 2	**Guarantee equal access to victims' rights and support services for all victims** – The Strategy should promote equal and non-discriminatory access to victims' rights and support services, regardless of crime type, geographical location, reporting status, personal circumstances or the institution victims first encounter. This requires consistent and harmonised implementation of the EU victims' rights acquis and the removal of practical, legal and structural barriers that prevent victims from accessing information, protection, support and justice.
Priority 3	**A solid foundation to respond to emerging forms of crime –** The Strategy should prioritise strengthening existing national victim support systems, including their capacity, accessibility and coordination, to respond to emerging forms of crime, rather than creating parallel structures. This should prioritise strengthening and connecting existing services, limiting duplication and fragmentation, while maximising coverage and accessibility for all victims and ensuring the availability of specialised responses for victims with specific needs. Particular attention should be given to the efficient use of resources and value for money, ensuring that investment translates into better access, quality and continuity of support.
PRACTICAL TOOLS TO STRENGTHEN IMPLEMENTATION	
A blueprint for national implementation of EU victims' rights	**Consistent, coherent and victim-centred implementation of the EU victims' rights acquis** – The Strategy should support Member States in translating EU victims' rights legislation into consistent, coherent and effective action at national level. It should promote a common, victim-centred and rights-based approach to the implementation of victims' rights across different EU legislative instruments, ensuring that rights are understood and applied in a complementary and mutually reinforcing way, rather than through fragmented or sector-specific approaches. To this end, the Strategy should promote the development of practical guidance (e.g. a blueprint) to help national authorities implement key priorities through a coherent, evidence-based and outcomes-oriented approach. The Commission should look at: • **Legal compliance** – transposition and effective implementation of EU victims' rights Directives (including sectorial legislation) into national law, while ensuring consistency and complementarity across the legislative framework. • **Victim-centred implementation** – embedding common rights-based principles across legislative and policy areas, including equal treatment, non-discrimination, accessibility, individual needs assessment, informed choice, participation, privacy and protection from secondary victimisation. • **Institutional arrangements** – assessment and strengthening of the procedures and structures required to give effect to victims' rights, such as referral pathways, functioning coordination mechanisms, cooperation between relevant authorities and victim support organisations etc. • **Outcomes for victims** – drawing on evidence from trusted victim support organisations and other relevant sources to identify remaining gaps in the exercise of victims' rights and inform targeted action to address them. • **Monitoring, peer support and accountability** – supporting Member States in assessing implementation progress and addressing gaps through clear

	indicators, regular reporting, peer learning, exchange of good practices and structured follow-up. Monitoring should assess both legal compliance and actual outcomes for victims. Where persistent or serious failures remain unaddressed, enforcement pathways should be set up, including infringement proceedings where appropriate. The Strategy should empower all victims to understand rights and seek justice including through access to national and European judicial mechanisms.
A coordinated approach	**National frameworks for coordination** - addressing victimisation requires a whole-of-society approach, recognising that no single actor can tackle it in isolation. This calls for close collaboration among Member States, EU Institutions, EU agencies, civil society, social partners, and other relevant stakeholders. To achieve this: • EC Coordinator on Victims' Rights (coordinate the EU's response) • EU Victims' Rights Platform, as a space for sustained dialogue with civil society actors and victim support organisations • Sustained investment in the victims' agenda: ensure that victims' rights remain a clear priority across funding streams under the next MFF; sustain investment in Technical Support Instruments (TSI) projects; and ensure funding recipients have the expertise to deliver effective solutions for victims.
FOSTERING BEHAVIOURAL CHANGE	
Raising awareness of victims' rights across the EU	**Make public awareness of victims' rights a sustained priority** - This could include the formal recognition of the existing European Day for Victims of Crime on 22 February, while promoting greater synergies between commemorative days addressing different forms of victimisation. This could include key dates such as the European Day for Victims of Crime, the EU Anti-Trafficking Day, the International Day for the Elimination of Violence against Women and other relevant dates, which need to be added to national commemoration calendars.
Fostering a culture of care, solidarity, and collective responsibility	**The Strategy should contribute to changing societal attitudes towards victimisation, challenging myths, misconceptions and stereotypes** - It should encourage action across society and within local communities, supporting initiatives that translate principles of dignity, empathy, and respect. Building on initiatives such as the Eyes Wide Open campaign and to artistic events and immersive simulations, this should form part of a broader resilience agenda that brings society together.

The following sections set out the specific priorities that we consider essential to achieving these objectives.

1. Accessible, high-quality and continuous support

Every victim should have **timely, free, high-quality, accessible and needs-based** support, regardless of the crime experienced or their individual circumstances. For support to be truly victim-centred, it should be tailored to each person and trauma-informed, recognising that trauma can have lasting effects on individuals and that interactions should be guided by principles of empathy, dignity, and respect.

Immediate to long-term support frameworks, with updated individual needs and risks assessments, are needed to fully support a victim throughout their experiences with support, justice, health, social services, etc. Greater emphasis should be placed on ensuring that individual needs assessments lead to concrete support and protection measures.

Needs can change over time, and the recast Directive explicitly recognises that individual needs may change and that assessment should enable support and protection corresponding to those needs. Therefore, continuity of support

throughout the victim journey should be set as a cross-cutting principle. For VSE, the new Strategy should adopt a **victim journey/life-course perspective.**

In the context of continuity of care, restorative justice should be recognised as an important avenue for victims seeking accountability, while ensuring that their agency, needs and choices remain central throughout the process. The EU should ensure that victims' rights, needs, safety, and wellbeing are at the heart of justice systems, and that restorative justice is accessible, safe, voluntary, and adequately supported.

National frameworks for comprehensive victim support

The Strategy should promote **national frameworks for comprehensive victim support**[1], ensuring sustainable access to both general and specialist services from the earliest possible stage and throughout recovery, taking into account the five needs of victims: dignity and respect, information, support, justice, and compensation and restoration. Systems should be designed to support agency, giving victims meaningful opportunities to make informed choices about how they engage with justice/support systems. Pathways to support should further be **non-discriminatory**, ensuring that rights and support do not depend on the type of crime, personal characteristics or willingness to report (i.e. ensuring that there is no hierarchy in the realisation of rights).

For this to be effective, it is fundamental that the **provision of information is adequate**, and that **referral mechanisms are designed with victims in mind**. Input from our members has highlighted that approaches such as opt-in/opt-out mechanisms[2] used by some authorities, when not explained correctly, can create confusion and may lead victims to decline support without fully understanding what is available. In this context, a *"no wrong door"* approach should be promoted, whereby victims can enter the support system through different services, be it health, police, or support services, and still be connected to the assistance they need.

VSE will further emphasise the importance of **long-term access to appropriate support for victims of all crime types**. Many systems limit services to initial support, while for some victims, recovery can take months or years and may require support across different sectors and at different stages of their lives. Particular attention should be given to situations where victims move between Member States or where specialist services are unavailable in one jurisdiction. Cross-border mechanisms should support continuity of care and prevent victims from losing access to assistance because of geographical/jurisdictional boundaries.

Rollout of the 116 006 Helpline

The implementation framework should also connect to the **116 006 European helpline for victims of crime**, strengthening its role as an entry point into national victim support systems. The rollout of 116 006 should be considered as part of the national implementation model, with the number serving as a gateway through which victims can access information, receive initial support and be referred to the most appropriate services. The helpline can also bring together victim support organisations, the technology industry and national and international authorities to collect data, analyse behaviours and also to report and respond to violence.

[1] Victim Support Europe, 2022, National Framworks for Comprehensive Victim Support, Brussels.
[2] To note, VSE recommends the opt-out mechanism be implemented to ensure that all victims receive appropriate, targeted and timely support. The opt-out approach calls for all victims to be offered a referral to support services, whereas opt-in mechanisms require victims to chose this referral.

These helplines have been made mandatory in Member States under the Victims' Rights Directive so that all victims of all crimes can have access to information, regardless of where they are in the EU. VSE, as the organisation that has developed standards for the operation and the accreditation of such helplines and being the entity that runs the Centre of Excellence on 116 006, therefore can provide expertise and guidance on how Member States can integrate 116 006 into their broader victim support systems, including questions around accessibility, operating standards, referral protocols, coordination, and links with existing national frameworks. Further, VSE can provide examples of good practices to support implementation of these helplines. VSE would also encourage investment into quality helplines that meet victim's needs.

The role of the EU in implementation

While recognising differences between national systems, the **EU should promote common minimum standards** concerning accessibility, quality, confidentiality, professional competencies, victim-centred justice and continuity of support. These standards should cover both general and specialist support services, with the inclusion of specific needs such as social welfare support, shelters, childcare, and training. It is also fundamental to have EU and national contact points, standarised national and cross-border referral pathways, information-sharing and handover arrangements to ensure continuity of support across borders.

Victim support organisations, including specialist services, deliver much of this support in practice and are often the main point of contact for victims. **The Strategy should recognise this role and ensure that quality standards are developed and monitored together with them.** VSE is open to playing a central role in setting standards and monitoring their implementation, creating a bridge between victim support organisations and the EU. The 116 006 helpline and national referral pathways should be built on formal cooperation with victim support organisations. Police, health and other first-contact services should refer victims to them, with appropriate consent and data-sharing arrangements, regardless of whether the crime has been reported.

2. Strengthen access to safe justice

Justice systems should **protect victims' safety, dignity and wellbeing**, including by promoting the effective implementation of existing rights. The Strategy should promote **trauma-informed and victim-sensitive** approaches that reduce the risk of secondary/repeat victimisation, ensure appropriate procedural safeguards, facilitate access to professional accompaniment and **assistance on court premises**, and guarantee meaningful opportunities for participation. **A rights-based approach means going beyond the formal recognition of rights in legislation and ensuring that victims can understand, access and exercise those rights in practice.** The effectiveness of justice systems should therefore be assessed not only by procedural outcomes and efficiency, but also by victims' experiences, safety, wellbeing and ability to participate.

The EU should support the effective exercise of victims' rights throughout criminal proceedings, **addressing the practical barriers that prevent victims from accessing justice**, including complex procedures, administrative burdens, language barriers, accessibility challenges and fear of further victimisation.

In this context, the Strategy could encourage Member States to strengthen practical access to:

- clear, timely, and understandable information;
- meaningful opportunities to participate in proceedings;

- professional victim support and accompaniment throughout proceedings, including assistance on court premises;
- appropriate legal assistance;
- compensation and reparation;
- protection from intimidation, retaliation, or instances of further victimisation;
- privacy; and
- effective remedies when rights are not respected.

To ensure wellbeing, it is fundamental to establish victim- sensitive court procedures and environments, including practical arrangements that minimise distress and facilitate safe participation. Examples include separate waiting areas, measures to avoid unnecessary contact with offenders, remote participation or recorded testimony where appropriate, court familiarisation visits and the use of facility dogs to support victims during proceedings. **Such measures should be adapted to victims' individual needs, including those of children and victims with disabilities, while safeguarding the fairness of proceedings.**

Strengthening access to safe justice also requires better coordination between judicial authorities, law enforcement and victim support organisations. The Strategy should promote operational protocols, effective referral pathways and clearly defined responsibilities to ensure continuity of support throughout proceedings. This could include designated victim liaison officers, structured cooperation with professional support workers and procedures to ensure that victims do not have to repeatedly explain their circumstances or navigate different services without assistance.

Although the organisation of criminal justice systems largely falls within national competence, the EU can support Member States in **identifying practical implementation gaps, exchanging effective practices and developing consistent operational standards for safe justice**. This could include implementation guidance, capacity-building activities, pilot initiatives and exchanges between judicial authorities and victim support organisations.

EU actions could also centre around promoting **consistent standards of care** for victims involved in criminal proceedings abroad, ensuring that victims receive comparable levels of information, support, and procedural treatment regardless of the Member State in which proceedings are conducted.

3. Mainstreaming victims' rights in EU policy

Crime affects every aspect of a person's life, for which **responses cannot sit only within the areas of justice and home affairs**. Victims' rights should be embedded more broadly in EU policy, including initiatives relating to health, education, digitalisation, migration, security, social policy, or external action, among others.

In line with this, and as already recognised by the Commission, **the victims' rights agenda should also be anchored within the EU's broader objective of building democratic, resilient and secure societies**. Empowering victims is not only a matter of individual rights; it also contributes to public trust in institutions, social cohesion and the resilience of communities. Ensuring that victims can access justice, receive appropriate support and participate meaningfully in criminal proceedings reinforces confidence in the rule of law and demonstrates that democratic institutions are responsive to citizens' needs.

The Strategy should serve as an overarching framework which recognises that individual wellbeing in the aftermath of victimisation, along with broader efforts in regards to crime prevention, are the cornerstone of resilient societies.

The objective should be to **break down the existent silos to embed victim-centred priorities across all sectors**, powered by strong, coordinated action between institutions, civil society, and communities.

Mainstreaming should move beyond policy intent to measurable implementation, for which the Strategy should promote practical ways to achieve this objective. At EU level, initiatives that enhance **cross-DG coordination** would be good to ensure that victims' rights are consistently integrated across the policy agenda and addressed in a coordinated manner. At national level, this priority should be reinforced by strong **cooperation mechanisms**, both horizontally across ministries and agencies, as well as vertically among organisations working at different levels of governance (including civil society and victim support organisations).

These cooperation mechanisms should further be informed by the voices of individuals with lived experiences themselves, who can provide invaluable insights on the barriers at different stages throughout the journey of victimisation, as well as potential solutions. For this, it is important that victim advocates and support organisations are incorporated into policy development at diverse stages, as well as in regards to different file types, both at national and EU level. In line with already existing Commission initiatives, the **EU Victims' Rights Platform can provide an important space for sustained dialogue** between institutional actors, victim support organisations, and civil society actors.

This work should also be closely **connected with relevant international instruments and standards on victims' rights**, ensuring greater coherence between EU, national and international frameworks. Building on existing international commitments can help strengthen common principles, identify gaps in implementation, and promote a more consistent approach to victims' rights across jurisdictions. The EU can play an important role in linking its policy with international developments, while also contributing to the further advancement of victims' rights on the global agenda. This should include continued engagement with relevant international organisations (e.g. the UN and its agencies), as well as ensuring that the experiences of victims inform the development of international standards.

4. Build stronger pathways for implementation at national level and efficient accountability mechanisms

VSE's vision is for the EU Strategy on Victims' Rights to be more than a policy framework: it should be a practical instrument to help Member States translate victims' rights into effective support, protection and access to justice. The Strategy should promote the co-design, with victim support organisations and relevant national stakeholders, of a practical reference model or **implementation blueprint/roadmap** that translates the Strategy's objectives into actionable elements for national systems. This should provide a common European framework while allowing flexibility to reflect each country's legal, institutional, financial and social realities.

The Strategy should clearly distinguish between the adoption of legal frameworks and the capacity of national systems to deliver the rights they establish. **Transposition puts rights into national law; implementation makes those rights real.** This requires adequate resources, clear responsibilities, effective coordination and mechanisms to identify and address implementation gaps. Progress should be assessed at three complementary levels:

- **Legal compliance:** Have Member States incorporated the relevant victims' rights requirements into national law?
- **Institutional implementation:** Have authorities established the procedures, referral pathways, professional standards, coordination arrangements and funding needed to deliver these rights?
- **Outcomes for victims:** Are victims receiving timely and accessible information, appropriate protection, effective referrals and continuous support that responds to their needs?

The Strategy should set out the core elements of a comprehensive victim-support system, enabling Member States to assess existing arrangements, identify gaps and plan improvements. These elements should include:

- **Coordination and accountability:** Clear responsibilities and cooperation between justice, law enforcement, healthcare, social services, child protection and victim-support organisations.
- **Identification and access to rights:** Early identification of victims, accessible and understandable information, individual needs assessment, and effective referral pathways to appropriate services.
- **Support and protection:** Accessible general and specialist victim-support services; protection measures responsive to individual needs and risks; and support throughout judicial proceedings, recovery and longer-term needs.
- **Access to justice and remedies:** Practical assistance to participate in proceedings and access legal aid, compensation and other available remedies.
- **Accessibility and non-discrimination:** Services and procedures that respond to different needs, including those of children, persons with disabilities and victims facing other barriers to access.
- **Professional capacity and quality:** Appropriate training and professional development, quality standards for victim-support services, and mechanisms for assessing service quality.
- **Resources and infrastructure:** Sustainable funding, adequate staffing, and appropriate physical and digital infrastructure, including accessible information and services.
- **Monitoring and evaluation:** Reliable data, measurable indicators and regular assessment of whether systems are reaching victims and delivering effective support.

To assess whether rights are being delivered in practice, the Strategy should establish a stronger framework for monitoring implementation, supported by common indicators that capture both the existence of structures and procedures and victims' actual ability to access and benefit from their rights. Member States should map each key right against the authorities and services responsible for delivering it. This would help identify gaps between legislation and practice, clarify responsibilities and support corrective action.

Monitoring should combine administrative data with evidence from victims and independent civil society, including victim-support organisations. Regular reporting and review should track progress over time, while EU-level peer learning and the exchange of good practice should help Member States address recurring implementation challenges. **Monitoring must lead to action:** where persistent gaps are identified, the Strategy should encourage clear improvement measures, defined responsibilities and follow-up.

A victim-centred approach to data is essential. VSE and its members call for improved collection and use of data on:

- Victims accessing general and, following assessment of needs, specialist support, disaggregated where appropriate to identify barriers and unequal access;
- Non-reporting and non-engagement with criminal justice systems and support services;
- Referrals, including whether referrals result in victims actually receiving support;
- Repeat victimisation and longer-term recovery;
- Cross-border victimisation and access to support across jurisdictions;
- Emerging forms of victimisation; and
- Victims' experiences and satisfaction with the information, protection, support and remedies received.

Data collection and sharing should be supported by appropriate interoperability, privacy and data-protection safeguards, and should be designed to inform improvements in policy and practice. **Crucially, data on victims must not**

be equated with criminal justice statistics. People may experience crime, seek or receive support, or face barriers to accessing their rights without reporting the crime or entering criminal proceedings. Monitoring frameworks must therefore capture victims' experiences beyond the criminal justice system, including whether support was accessible, appropriate and effective.

5. Make victims' rights a priority in EU funding by ensuring sustainable capacity and investment to professionals

Victims' rights cannot be effectively implemented without well-functioning support systems, skilled professionals and sustainable, predictable resources. The Strategy should therefore recognise adequate funding as a key condition for delivering victims' rights in practice and establish victims' rights as a clear priority within the post-2027 Multiannual Financial Framework (MFF) and other relevant EU funding programmes.

The Strategy should promote **mainstreaming victims' rights across EU funding instruments**, including justice, health, education, social protection and security. This should be operationalised through dedicated funding priorities, the integration of a victims' rights perspective into programme design and evaluation, and horizontal funding conditions promoting victim-centred, trauma-informed and non-discriminatory approaches. The Commission should provide guidance to managing authorities on incorporating victims' rights into funding priorities, eligibility criteria and project selection, ensuring coherence with the revised Victims' Rights Directive and other relevant EU legislation.

Sustainable investment in national victim support systems should be prioritised, including general and specialist services, 116 006 helplines, multidisciplinary support centres, shelters and psychological assistance. Member States should be encouraged to conduct national needs assessments and service mapping to identify geographical disparities, gaps in accessibility and unmet needs. These findings should inform national investment plans, with clear funding priorities, responsible authorities and implementation timelines. EU funding should also support coordinated referral pathways, common quality standards and preparedness mechanisms for crises and mass victimisation.

The Strategy should promote **multi-year and core funding rather than reliance on short-term projects**, ensuring continuity of services and organisational stability. This could be implemented through dedicated operating grant schemes, multiannual funding agreements and simplified funding procedures, including proportionate reporting requirements, reduced co-financing obligations and technical assistance for smaller and specialist organisations. Funding arrangements should safeguard the independence of civil society organisations and establish structured mechanisms for their participation, alongside victims, in the design, implementation and evaluation of funding programmes.

The Strategy should further promote **evidence-based investment through needs assessments, resource mapping and cost-benefit analyses**. The Commission could support comparative studies examining the resources required to establish and maintain effective national victim support systems, identifying cost-effective interventions and transferable practices. VSE could contribute through evidence gathered from its members and comparative research. Such studies should also assess **the cost of inaction**, including the wider health, social, justice and economic consequences of inadequate or delayed support. This would provide Member States with evidence to prioritise investments and demonstrate the potential long-term benefits of prevention and early intervention.

6. Future-proof the response to new and large-scale forms of victimisation

The new EU Victims' Rights Strategy should recognise that the **digital environment has fundamentally changed the nature of victimisation**, with far-reaching consequences that extend well beyond the immediate harm. These new forms of crime (mainly cybercrime and technology-facilitated forms of violence) also challenge many of the

assumptions underpinning traditional criminal justice systems, as perpetrators may remain unidentified or operate across jurisdictions, thereby limiting victims' prospects of obtaining justice through conventional proceedings.

Victims' rights must remain effective when victimisation happens online, at scale, and across borders. The Strategy should seek to establish a **future-proof, holistic framework capable of adapting to intersecting forms of victimisation**, in an increasingly evolving environment. A single cybercrime operation can potentially affect thousands of people, creating significant challenges for justice and victim-support systems, that may need to respond to large numbers of victims without losing sight of each individual.

In view of the challenges in prosecuting cyber forms of crime, VSE advocates for an approach in which responses begin at the point of victimisation, with mechanisms aimed at mitigating harm, supporting victims, preserving evidence, and/or facilitating access to appropriate forms of redress (even when perpetrators cannot be identified). This requires victim support organisations to have the capacity, technical expertise and resources to support victims of cybercrime, as well as the ability to scale up rapidly in the event of a crisis.

Further to this, a more holistic EU framework on cybercrime is needed, moving beyond sectorial legislation to ensure greater coherence in placing the rights of individuals at the centre of the response. Such an approach requires **greater integration of victim considerations into relevant digital policy frameworks** (e.g. Digital Services Act), alongside stronger cooperation between law enforcement authorities, digital service providers, governmental institutions, civil-society organisations, and other industry players. **Technology companies** in particular have an important role to play in strengthening prevention, detection, reporting and response mechanisms, while victim support organisations can contribute expertise on the needs and experiences of those affected. Bringing these perspectives together would help ensure that policy responses are not developed in isolation, but form part of a more coherent framework that addresses both the systemic and individual impacts of cybercrime.

Equally, greater attention is needed to **developing knowledge on the psychological impact of online crime**, particularly in relation to offences in which victims experience prolonged uncertainty or are unable to achieve a sense of closure. A better understanding of these impacts is essential to ensuring that criminal justice and victim support systems are equipped to respond effectively to victims' needs. This requires sustained investment in the capacity of these systems, including through appropriate training, funding and adequate digital infrastructure.

A fundamental component in the reduction of cybercrime is also **prevention**. Response to online harms cannot rely solely on telling individuals to be more careful online, nor should prevention become a means of shifting responsibility onto individuals. Platforms, technology providers and other actors across the digital ecosystem must also play their part in reducing risks, responding effectively when victimisation occurs, and ensuring accessible pathways to support. The lived experiences of individuals should be used, with appropriate safeguards, to identify emerging risks and inform prevention and risk-reduction measures, making victim support an integral part of a future-proof EU approach to cybercrime.

Building **resilience to online harms should begin early and continue throughout people's lives**, equipping individuals with the skills needed to navigate the digital environment safely. Education initiatives should go beyond basic advice on online safety or digital hygiene, in order to help individuals recognise forms of online harm, understand how and where to seek help, and know their rights in the event they experience a crime. Education should form part of a broader whole-of-society approach to preventing cybercrime, recognising that investment in high-quality, age-appropriate programmes (including for groups that may face heightened risks of online victimisation) can strengthen prevention. However, **education and awareness are important. But responsibility cannot rest with potential victims**

alone. Platforms, technology providers and other actors within the digital ecosystem also have responsibilities to reduce risks, respond effectively when victimisation occurs, and make routes to help and redress accessible.

Technology can be a force for good in preventing and responding to crime, but its effectiveness depends on its responsible use through appropriate safeguards. Member States should ensure that the use of artificial intelligence (as well as other digital technologies) in e.g. the digitalisation of justice, is victim-centred and rights-based. Victims should be informed, where appropriate, when AI-supported tools affect decisions concerning their rights, protection or access to justice, and should have access to effective human review. The Strategy should also encourage Member States to assess the **potential impact of AI on victims**, including risks of discrimination, misidentification, privacy breaches, secondary victimisation and barriers to accessing support.

Beyond cybercrime, a future-proof victims' rights strategy should also encompass **major incidents, crises, or situations of mass victimisation, where existing response systems may face exceptional pressures**. Member States should aim to ensure that victim support services (as well as other response systems) remain operational during crises, including health crises, humanitarian situations and other emergencies. This could include initiatives such as preparedness plans; emergency victim-support protocols; cross-sectoral and cross-border coordination; identification and registration mechanisms; family assistance mechanisms; and systematic learning after major incidents through e.g. table top exercises[3].

7. Reach victims who face barriers to reporting and accessing support

The Strategy should address the "hidden" or underserved victim population; people who experience crime but do not report it, do not recognise themselves as victims, do not know where to seek help, or face practical, social or institutional barriers to accessing support. This includes barriers linked to stigma, fear, dependency, lack of information, geographical isolation, disability, language, migration status, digital exclusion or mistrust of authorities. it should address cross-sectoral bodies, inclusive of private entities, victim support organisations, health, social support systems, law enforcement, etc. The focus should be on bringing support closer to victims, rather than making access dependent on victims first entering the criminal justice system.

VSE would like to **encourage approaches that focus on addressing the barriers that can make victimisation invisible in the first place**. While these may vary, they may include:

- lack of awareness of rights or available support;
- fear or mistrust of authorities, including because of previous negative experiences;
- language or geographical barriers;
- concerns about the consequences of reporting for immigration status, employment, housing or other aspects of life;
- stigma and fear of not being believed;
- accessibility barriers; and
- uncertainty about whether an experience constitutes a crime or whether support is available.

At the same time, and as highlighted by our members, reaching all victims requires a broader network that goes beyond victim support organisations alone. Healthcare professionals, social services, schools, workplaces, migration

[3] For more information on victim-centred approaches to mass victimisation, see Victim Support Europe, *Integrating Victim-Centred Practices Across the Large-Scale Event Cycle: Responding to Mass Victimisation and Terrorism*.

services, private identities, consulates and other frontline actors can play an important role in recognising victimisation and facilitating access to support. In this regard, solutions could focus on promoting the development of **specialised services and multidisciplinary teams** to better identify and support victims with specific vulnerabilities, ensuring that assistance is tailored to individual needs.

Conclusion and further priorities

The forthcoming EU Strategy on Victims' Rights should look beyond the response to victimisation and consider how prevention and risk reduction can complement effective support, protection and access to justice. This could include targeted awareness and literacy initiatives for children and young people, helping them recognise different forms of crime, understand where and how to seek help, disclose victimisation safely and access support at an early stage. Such initiatives should complement, rather than replace, the responsibilities of authorities and services to prevent harm and respond effectively when it occurs.

Victim support organisations bring essential expertise, evidence and early insight into emerging patterns of victimisation. They see where systems work, where they fall short and where change is needed. They also help ensure that the experiences of victims who face the greatest barriers to being heard inform policy and practice. The European Commission and Member States should therefore engage victim-support organisations as strategic partners in shaping and delivering the Strategy, rather than solely as service providers or consultees.

Victim support organisations are not only essential partners in delivering victims' rights; as part of civil society, they also contribute to democratic resilience, public accountability and social cohesion. By supporting people to understand and exercise their rights, amplifying the experiences of those who might otherwise remain unheard, and identifying gaps between policy and practice, they help strengthen trust in institutions and ensure that public systems remain responsive to people's needs. The Strategy should therefore recognise **an enabling civic space as a condition for effective victims' rights implementation**. Victim-support organisations must be able to operate independently, engage in policy dialogue, monitor implementation, raise concerns and advocate for change without undue restrictions or barriers to their work. The European Commission and Member States should protect meaningful civil society participation throughout the policy cycle and ensure that victim-support organisations have the resources, access and institutional recognition necessary to contribute. **A strategy that seeks to strengthen victims' rights must also safeguard the space in which victims and the organisations supporting them can make those rights heard, defended and realised.**

If we want justice systems that foster trust, accountability and social cohesion, victims cannot be an afterthought. We need approaches that prevent harm wherever possible, mitigate risks, respond effectively when victimisation occurs, and accompany people throughout their recovery and pursuit of justice. For us, this is what a truly holistic and future-proof approach to victim support looks like.

The recast Directive specifically strengthens child-sensitive requirements, including the child's best interests, age, maturity, views, needs and concerns. **A cross-cutting principle of the new Strategy can further be a child-sensitive implementation across the entire victim journey**; an implementation that would also take into account the EC Recommendation on Integrated Child Protection Systems, the Action Plan on Cyberbullying and the coming Action Plan on Protecting Children from Crime, among others.

The next phase of EU victims' rights policy must **move from establishing rights to building systems that consistently deliver them**. The revised Victims' Rights Directive provides a stronger legal baseline, but legislation alone cannot

guarantee that victims receive timely information, appropriate protection, effective referrals, accessible support and meaningful access to justice and compensation. These outcomes require sustained investment, clear responsibilities, coordination across sectors, quality standards, robust monitoring and accountability when implementation gaps persist.

The Strategy should provide a clear implementation agenda for 2026–2030, setting out how the EU and Member States will turn shared commitments into measurable improvements in victims' lives. **The real measure of the Strategy will not be the strength of its commitments on paper, but whether victims experience a tangible difference in their everyday lives.**

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 80 member organisations in 36 countries, providing support to around 3 million people affected by crime every year. Founded in 1990, VSE has been working for 35 years for a Europe, and a world, where all victims have strong victims' rights and services, whether they report the crime or not. We work towards this mission through evidence-based policy and advocacy to improve European and International laws, through research and knowledge development and through capacity building and projects at national and local level.