



WOMEN AGAINST VIOLENCE EUROPE
WAVE Network and European Info Centre against Violence

WAVE input to the Call for Evidence on the EU Strategy on Victims' Rights

Advocating for the rights of women and girls affected by violence: ensuring their right to specialist support

About WAVE

Women Against Violence Europe (WAVE) is the European network of women's specialist support services, bringing together 197 organisations that represent circa 1,800 women's organisations across 46 countries. Our members are the frontline responders to violence against women and girls (VAWG). They run women's helplines, women's shelters, rape crisis and sexual violence referral centres, and counselling, advocacy and prevention services for women and children survivors.

WAVE welcomes the Commission's intention to adopt a new EU Strategy on Victims' Rights, anchored on a holistic, victim-centred approach. This submission concentrates on the areas where WAVE and its members hold direct expertise. Because the Victims' Rights Directive (VRD) is horizontal legislation covering victims of all crimes, we do not comment on every provision, only on those that determine whether victims of violence against women and girls reach the specialist, gender-specific support they are entitled to.

Advances in the VRD recast that the Strategy should consolidate

WAVE recognises the following advances made by the Victims' Rights Directive recast, and expects the new Victims' Rights Strategy to consolidate them:

- **Consent-anchored contact by support services.** Women's specialist services (WSS) have always held that, in cases of VAWG, the pace of the support process must be set by survivors themselves. Voluntary request and referral to specialist support, including to WSS, is part of recognising a survivor's agency and helping her rebuild her sense of power and control. We therefore welcome that, under the VRD recast, when the individual assessment identifies a need, support services may contact a victim only where the victim, having been informed of the support available, consents, or herself requests support (Article 8(2)); and that the individual assessment is carried out with the victim's close involvement and due respect for her wishes, including where she does not wish to receive support (Article 22(6)). This voluntariness is a cornerstone of women's specialist support and practice.
- **Access to reporting and victim support regardless of residence status.** WAVE has advocated for this change for many years. Women survivors of VAWG deserve victim support and access to justice without their residence status becoming a disincentive to come forward. The recast's recognition that victims who are third-country nationals, irrespective of their residence status, must not be discouraged from reporting and must be able to exercise their rights, including to be heard and to an

individual assessment (Article 5a(7); Recitals 10 to 11), is a welcome advance for migrant and undocumented women.

- **Reporting for people in closed settings.** Institutionalisation and restrictions on liberty and movement have long been barriers to reporting violence against women and girls. Women and girls with disabilities and elderly women who are victims of violence in care homes and other institutions now have their right to victim support and to report crimes preserved by the recast. The same applies to migrant women and women on the move. The recognition that people who are deprived of, or restricted in, their liberty can effectively report crimes committed in prisons, detention centres, and other closed settings such as mental-health and social-care institutions, children's homes and retirement homes (Article 5a(5); Recital 10) is a key advance in victim protection.
- **Co-location kept proportionate.** WAVE has repeatedly warned against one-stop-shop models for survivors of VAWG and DV: on the one hand because they risk survivors having to encounter their perpetrators unnecessarily throughout the criminal process; on the other because co-location operates on the logic that survivors must move through each step at the pace of the institutions and the judicial case, rather than at their own pace as they rebuild confidence and agency. We therefore welcome that, in the recast, the "same premises" model is confined to services for child victims (Article 9a(3)) and is not imposed on adult women survivors of VAWG and DV, consistent with WAVE's position against one-stop-shop models for adult survivors.

These are the right foundations, but they are not yet the finished architecture. Because the VRD recast's rules are enabling rather than protective, how Member States implement them will decide whether victims of violence against women and girls actually reach the support they deserve: a response built on specialist expertise. The question the new Victims' Rights Strategy has to answer is not how services are organised on paper, but how to guarantee that a survivor reaches the gender-specific, trauma-informed expertise her situation requires, wherever she first turns for help. Survivors deserve access to women's specialist services, and it is that entitlement, not the structure that delivers it, that implementation must secure.

General victim support must reinforce women's specialist services, not replace them

The revised Victims' Rights Directive, adopted on 17 June 2026, consolidates the general EU framework for all victims of crime, including new provisions on helplines (Article 3a), reporting (Article 5a), victim support and specialist support services (Articles 8 and 9), the individual assessment (Article 22), and protocols or guidelines on cooperation between general and specialist services (Article 26a). Member States must transpose most of its provisions within two years. For victims of violence against women and girls (VAWG), more specific standards already exist and bind the EU: the Istanbul Convention, in force for the EU since 1 October 2023, and the Directive (EU) 2024/1385 on combating violence against women and domestic violence, to be transposed by 14 June 2027.

These legal frameworks are designed to work together, but they risk contradiction if each provision is implemented in isolation. The central risk WAVE asks the European Commission to address in the new Victims' Rights Strategy is the de-prioritisation of specialist support and the dilution of women's specialist services. In WAVE's reading, Article 8(3) of the revised VRD, which allows Member States to establish specialist support services in addition to, or as an integrated part of, general victim support services, will not be satisfied in practice by treating non-specialised, non-gender-specific provision for all victims as sufficient. The dilution is one of entitlement, not only of provision. Where recognition, referrals and funding are diverted away from women's specialist services, women and girls lose the practical means of exercising their

right, as victims of crime and specifically of VAWG, to have their specific needs recognised and met. Protecting those services is the precondition for that right, not an organisational preference.

WAVE's working distinction, in line with Article 22 of the Istanbul Convention, is as follows:

Women's specialist services (WSS): gender-specific, survivor-centred support delivered by independent, women-led feminist organisations, including women's support centres, shelters, women's helplines, rape crisis and sexual violence referral centres, and primary prevention services. Article 22 of the Istanbul Convention recognises them as indispensable.

General services: broader public services accessible to survivors of all crimes but not necessarily gender-specific.

Generic services: broad-mandate NGOs or institutional actors supporting victims of all crimes, without a feminist or gender-specific analytical framework. The revised VRD does not use this term, but WAVE distinguishes it because it is the category assumed as specialist provision, although it is not¹.

These distinctions matter to survivors before they matter to service providers, because they determine what a woman actually receives when she discloses. WAVE therefore asks that the new Strategy support Member States in clearly delimiting between general, generic and specialist services, setting out the distinct role and added value of each. General and generic services remain essential first points of contact, but they cannot substitute for the gender-specific, rights-based, trauma-informed response that only women's specialist services provide. General victim support cannot substitute for WSS any more than general medical care can substitute for specialist care. Crimes such as rape, domestic violence, stalking and technology-facilitated violence against women and girls require feminist-informed, survivor-centred expertise.

Against this background, the new Victims' Rights Strategy should reinforce that women and girl victims of violence reach the specialist support they need, in particular WSS: feminist, women-led services grounded in a gender-sensitive and intersectional understanding of violence, consistent with the VRD, the VAW Directive and the Istanbul Convention. Clear, needs-based referral mechanisms must operate between general, generic and specialist services, so that every victim reaches appropriate support regardless of her point of entry. Where survivors reach general or generic services that are untrained to understand gendered violence, and are not referred onwards, women's needs are overlooked and re-victimisation rises, directly reducing safety.

Merging these three types of service in EU policy and legislation, or leaving it to Member States to determine which service is adequate for victims with specific needs, is inadequate and runs counter to the EU's commitments under the Istanbul Convention. It also displaces the decision away from the person best placed to make it. When women's specialist services are treated as interchangeable with general or generic provision, survivors of violence against women and girls risk receiving inadequate support, owing to the absence of the knowledge and sensitivity needed to handle VAWG cases, impairing their recovery and opening a window in which secondary victimisation can occur.

¹ Women Against Violence Europe (WAVE) Network, *Agents of Change: Women's Specialist Services and Their Feminist, Multi-Level Approach to Tackling Violence Against Women and Girls* (Vienna: WAVE, 2026), [WAVE Agents of Change Study](#).

In Member States, or specific local arrangements, where specialist services operate as an integrated part of general services, as in the one-stop-shop model, particular caution is needed. Integration must not come at the cost of the specialist mandate: WSS must retain their women-led, feminist, gender-sensitive approach and dedicated expertise, and, where relevant, a degree of independence from generic or state structures, so that specialisation is not diluted, absorbed, or claimed by generic services that are not equipped to deliver it. The Strategy should call on Member States to maintain a clear delimitation of scope between generic and specialist provision within any integrated model, and to ensure specialist services, including those delivered by women's rights NGOs, are adequately and sustainably resourced in their own right, rather than as a subordinate function of the generic or general structure they sit within.

Victim/survivors of VAWG are entitled to a service adequately trained, holding a women-centred, trauma-sensitive approach from start to finish, that adapts and designs its support around the individual needs of each victim and focuses on her recovery, autonomy and agency, not only on the criminal proceedings. Only women's specialist services are built to deliver that. WSS also monitor the situation of VAWG at the national level, innovate and adapt to new forms of violence affecting women and girls, and are the first to sound the alarm when violence is increasing, as they did during the COVID-19 pandemic. Defunding or displacing WSS by merging them into general and generic services would therefore remove the state's own quality control on policy to address violence against women and girls and, by extension, on victim-support policy as a whole.

WAVE is aware that the new Victims' Rights Strategy cannot create binding duties. It can, however, steer coherent implementation of the hard law now in place concerning the role of specialist support services for victims with specific needs and, in the case of violence against women and domestic violence, the distinct role of women's specialist services recognised by the Istanbul Convention.

Against this background, WAVE's overarching recommendations are that the new Victims Rights Strategy should:

- Keep violence against women and girls visible as a cross-cutting priority in its own right, ensuring the new Strategy complements and builds on the Gender Equality Strategy and works towards a holistic, coherent response to the needs of victims of VAWG, using guidance on the implementation of the VRD recast, EU funding and the Victims' Rights Platform to address the gaps in the support these victims need from a horizontal perspective, and aligning VRD monitoring so that its implementation is held to Istanbul Convention standards.
- State explicitly that the general or generic victim-support framework complements but does not replace specialist services, in particular women's specialist support services in VAWG matters, and that referrals and funding must not be diverted away from them.
- Clearly position the Strategy as the implementation vehicle for the distinction between general, generic and specialist services, recognising the distinct role of WSS in addressing VAWG.

In the second part below, WAVE provides detailed input on each of the priorities identified in the Call for Evidence.

1. Prevention, awareness, information and safe reporting

Information and awareness of rights

As set out in the Call for Evidence, the new Victims' Rights Strategy will prioritise more effective crime reporting and greater public awareness. As a new set of rights is recognised in the VRD recast, it is sensible for the Strategy to ensure that victims of crime in the EU have access to detailed information on the new reporting channels, the new rights recognised, and how the overall victim support system in Europe is better tailored to their needs.

WAVE supports this goal. For victims of violence against women and girls, information and reporting must be gender-sensitive, trauma-informed and safe, and delivered by specialist support services, concretely by WSS. In line with the distinction set out above, this information should make clear which services can be provided by general victim support and which can only be provided by women's specialist services.

Information and awareness are necessary, but the new Victims' Rights Strategy should go one step further and act on a priority we have long emphasised: prevention, so that people do not become victims in the first place. Raising awareness and information for those who have already been victims of crime in the EU is highly relevant, precisely because, as the previous Victims' Rights Strategy recognised, barriers to accessing protection which deterred victims from seeking support or pushed them out of the system have now been reduced or eliminated. But for everyone who may become a victim, information about their rights and support is as important as serious EU investment in prevention. These are two halves of a coherent response to old and new forms of crime, in particular crimes with an increasingly digital component, as is the case with technology-facilitated violence against women and girls. WAVE therefore calls for the Strategy to include a distinct pillar of action on prevention.

Effective prevention is a multi-layered framework and requires coordinated action: primary prevention, which stops violence before it occurs by tackling risk factors and the patriarchal norms that normalise it; secondary prevention, which detects violence early and prevents escalation, including through timely specialist support; and tertiary prevention, which manages the consequences of violence, supports recovery and prevents reoffending and re-victimisation. Just as a fork cannot function if one prong is missing, EU efforts to tackle crime remain incomplete unless a coherent prevention approach is adopted, addressing all three forms together.

The EU's current approach to victim support and its response to crime leans disproportionately on interventions that come after violence has begun, and on awareness-raising campaigns that address public attitudes without changing behaviour or confronting root causes. Decades of evidence show that, while well-designed awareness-raising campaigns may shift attitudes, they do not build the social skills needed for prosocial action, nor do they change behaviour.

This is directly relevant to a gap identified under the 2020 to 2025 Victims' Rights Strategy: despite Commission awareness campaigns, victims too often remained unaware of their rights. The lesson is not to abandon awareness work but to stop expecting campaigns to achieve, on their own, what only sustained primary prevention can. The new Victims' Rights Strategy is an opportunity to ensure that victims of all crimes, including victims of violence against women and girls, are not only informed of their rights but protected by active primary-prevention measures as part of victim support.

Recommended Strategy actions:

- Establish prevention as a distinct pillar of the Strategy, structured around coordinated primary, secondary and tertiary prevention, rather than treating awareness-raising as prevention in itself.

- Pair rights awareness with primary prevention: ensure that victims are informed of their rights and that the EU invests in behavioural and structural change that reduces victimisation in the first place.
- On VAWG, design campaigns with women's specialist services, addressing under-reporting and avoiding gender-neutral framing that obscures the disproportionate impact of male violence against women and girls.

Helplines

The VRD recast introduces a general victims' helpline under the Union-wide number 116 006 (Article 3a), designed to refer victims onward to specialist helplines, including national women's helplines, in addition to the EU helpline against violence against women, 116 016. WAVE welcomes that the recast preserves existing national numbers and helplines run by non-governmental organisations (Recital 4), just as the Directive on combating violence against women and domestic violence recognises that the EU women's helpline neither can nor should replace national women's helplines.

The risk lies in how these provisions are implemented. To ensure that victims with specific needs access the support they are entitled to, referral pathways must be clear. For victims of violence against women and girls, this means ensuring clear referral pathways between the general EU victims' helpline and the EU helpline against VAWG, and from the latter to national women's helplines.

Experience with large-scale helplines, particularly those operated by commercial call-centre providers, shows real risks of inadequate training, mishandled disclosures, secondary victimisation and loss of trust. At the same time, funding cuts already mean that established national women's helplines struggle to sustain multilingual, 24/7 service. The establishment of the EU-wide victim support helpline must not become a pretext for defunding national women's helplines or weakening the service at national level by putting women's helplines out to public tender, with selection driven by commercial logic rather than victims' needs.

Recommended Strategy actions:

- Ensure clear, needs-based referral pathways from the general victims' helpline (116 006) to specialist support helplines, as required by Article 3a(1)(c). Staff should be trained to recognise violence against women and girls and to transfer callers onwards to the women's helpline (116 016) and to established national and NGO-run specialist women's helplines.
- Promote specialist operation and quality standards for helplines serving victims of violence against women and girls, based on the experience and work of those women's helplines themselves, and discourage outsourcing to generic or public-procurement providers without demonstrated VAWG competence.
- Monitor the roll-out of 116 006 and its interface with 116 016 so that harmonisation does not defund or displace proven, recognised national women's specialist services and women's helplines.

Safe reporting, including for migrant and undocumented women

The VRD recast's decoupling of victims' rights from residence status (Article 5a(7); Recital 10) and its "free in, free out" logic for reporting (Recital 11) are important gains. But safe reporting only translates into safety if reporting is genuinely separated from immigration enforcement, and if women are told about, and helped to access, the protections available to them. This connects directly to the concerns about co-located, state-run models in Section 2: undocumented women are among those most deterred from reporting where immigration authorities may be present.

Recommended Strategy actions:

- Promote a clear, practical separation between reporting violence and immigration enforcement, so that residence status does not deter reporting.
- Reach migrant, refugee and undocumented women with information on their rights in accessible formats and multiple languages, delivered with and through women's specialist services.
- Encourage Member States to move beyond the recast's optional autonomous residence permit (Article 5a) towards a guaranteed, renewable autonomous residence permit for victims, in line with Article 59 of the Istanbul Convention, with reasonable evidentiary requirements that reflect the realities of violence, and to fund the WSS that help women navigate residence procedures.

Reporting from closed settings

The new obligation that people in detention and other closed settings can report crimes (Article 5a(5)) must be operationalised so that women in institutional care, reception and detention facilities have safe, confidential channels and referral pathways to specialist support. This is essential for older women and for women and girls with disabilities in care homes and institutions, and for migrant women in reception and detention. These populations must be actively included in awareness-raising and prevention efforts. The people who work in these facilities must also understand that they may not violate the rights of those under their care or control.

Proper training must ensure that potential offenders, including law-enforcement officers in detention settings, know they are bound by the law. WAVE is concerned that the current rhetoric of EU institutions on migration and people on the move risks dehumanising migrants and normalising an excessive use of force that is inconsistent with the rights the Victims' Rights Directive affirms. Training and awareness for the agents of Europol and Frontex, and their national equivalents, is therefore a particularly important component of making these rights real.

Recommended Strategy actions:

- Operationalise safe, confidential reporting channels and referral pathways to specialist support for women in care institutions, reception and detention settings.
- Include people in closed settings, and the staff responsible for them, in awareness and prevention efforts, so that facility staff and frontline officers understand and uphold victims' rights.
- Require rights-based, VAWG-competent training for personnel in detention, reception and care settings, including Europol, Frontex and national equivalents, to prevent abuses of power against people under their control or care.

2. Individual assessment and referral to specialist support

The individual needs assessment (Article 22) and the arrangements for contact and referral (Articles 8(2) and 9(1)(b)) are the provisions most likely to determine whether victims of violence against women and girls reach specialist services or are routed into general ones. WAVE welcomes that the VRD recast strengthens the assessment's attention to intersectional discrimination on the basis of gender and gender identity, age, disability, residence status, religion or belief, language, racial, social or ethnic origin, and sexual orientation (Article 22(2)(a)), and anchors contact in the victim's consent and wishes (Articles 8(2), 22(6)).

For victims of VAWG, this should be operationalised to mean that referral to women's specialist services is an integral part of their victim support, in coherence with their particular needs and the nature of the crime. In practice, this means that when a woman victim of violence comes to a general service, general services

should refer her to specialist services, namely WSS, and the Strategy should mention this clearly, allocate resources for WSS as well as establish clear referral pathways between general and specialist services.

This also has consequences for who carries out the assessment. Under the recast, the individual assessment is carried out by “appropriately trained persons” and competent authorities, with specialist services placed in a collaboration-and-referral role (Articles 22(1a), 8(2)). When it comes to VAWG victims, the Strategy should recognise the role of WSS as first responders: across Europe they routinely act as first point of contact, lead risk assessor and coordinator of local multi-agency networks, a role affirmed by decades of established practice and by GREVIO’s Mid-Term Horizontal Review. Recognising that role is what makes the referral pathway work in both directions, so that a woman who first reaches a general service is referred to WSS, and a woman who first reaches WSS has that assessment recognised by the authorities rather than repeated.

Recommended Strategy actions:

- Affirm that WSS (namely women’s helplines, shelters, and rape crisis and sexual violence referral centres) are the standard specialist response (Istanbul Convention Articles 22 to 25; Directive (EU) 2024/1385), not an optional referral endpoint.
- Promote referral pathways that default to women’s specialist services for victims of violence against women and girls, and assessment practice that reliably identifies domestic violence, sexual violence and other forms of violence against women and girls, draws on specialist expertise and avoids secondary victimisation.
- Recognise and resource WSS as first responders and as expert partners in risk assessment and multi-agency coordination, consistent with Article 15 of the Istanbul Convention, and drawing on the recast’s cooperation protocols (Article 26a). WSS should also be required partners in standard-setting and national action plans consistent with the consultation duties under Article 18 of the Istanbul Convention and Articles 40 to 41 of Directive (EU) 2024/1385.
- Recognise that women’s specialist services, as first responders, provide support tailored to survivors’ needs and available for as long as necessary, extending well beyond the duration of criminal proceedings, and ensure that referral pathways and funding reflect this long-term role.
- Reinforce specialist support for victims of sexual violence, including rape crisis centres and sexual violence referral centres (Istanbul Convention Article 25; VRD Articles 9(3) to (4)), and promote consent-based approaches.
- Support gender-competent training of first-contact authorities, police and justice professionals on violence against women and girls and on avoiding victim-blaming, in line with Article 15 of the Istanbul Convention.
- Guard against the residual endorsement of “one-stop shops” in Recital 62: for adult women survivors, co-located, state-run models can compromise safety, confidentiality and autonomy, and deter the most marginalised women, including undocumented women who fear encountering immigration authorities, and women in rural areas underserved by centralised provision.

3. The risks of restorative justice in cases of violence against women and girls

On restorative justice, the Call for Evidence identifies it as a key tool and lists it, alongside mediation and other forms, as a route to compensation and restoration. WAVE wishes to contribute a critical perspective rooted in our members’ experience and specialist voice, and in the findings of GREVIO’s Mid-Term Horizontal Review of baseline evaluation reports concerning the evaluation of Article 48 on the Prohibition of mandatory alternative dispute resolution processes or sentencing.

Restorative justice must be approached with extreme caution in cases of violence against women and domestic violence. Article 12 of the VRD recast, concerning the right to safeguards in the context of restorative justice services, was left unchanged. As a result, the recast continues to facilitate referral to restorative justice (RJ), including victim-offender mediation, and obliges Member States to establish procedures or guidelines for such referral (Article 12(2)). It also continues to assume that the generic safeguards included in the text, linked to safety considerations, on the basis of free and informed consent that may be withdrawn, and with full prior information and confidentiality (Article 12(1)) are enough and equally applicable to victims of all crimes, and do not include any exemptions or limitations for situations where the RJ model is inadequate, as is the case with the specific dynamics of violence against women and girls, and domestic violence. In WAVE's assessment, that is a serious gap the recast should have addressed, in light of the EU accession to the Istanbul Convention.

This gap has also been highlighted by WAVE and by GREVIO. In its Mid-Term Horizontal Review, GREVIO noted that “several state parties explicitly ban mediation and alternative dispute resolution mechanisms in family law or criminal proceedings when domestic violence is present”, highlighting that, “in this regard Spain stands out as a promising practice due to its organic legislation [...], which enforces a strict and absolute prohibition on mediation and conciliatory practices in all civil and criminal proceedings involving gender-based violence”² Thus, restorative justice is not recommended in cases of VAWG and DV, for reasons linked to the nature of the crime, as follows:

- **Inequality of the parties.** Whatever its proponents intend, RJ is in substance a form of mediation, and mediation presupposes parties who meet on an equal footing. In cases of violence against women and girls, the parties are not equal: the violence itself makes an equal basis impossible. This is precisely why Article 48 of the Istanbul Convention prohibits mandatory alternative dispute resolution, including mediation.
- **Consent that is not free in front of unequal parties.** Article 12(1)(a) requires free and informed consent, yet the subordination (material, moral and psychological) that keeps women within the cycle of violence, together with fear, guilt and the frequent institutional failure to recognise violence at all, makes genuinely free and informed consent extraordinarily difficult to secure. Where violence is not even acknowledged, the freedom of consent cannot reliably be assessed.
- **Safety and risk assessment.** RJ raises the unanswered question of who assesses, and takes responsibility for, the woman's safety, not only during the encounter but across her life, given the risk of continued intimidation, threats and emotional blackmail.
- **Timing.** The time of criminal proceedings does not correspond to the survivor's own time of processing, awareness and choice. Proceedings frequently intervene while a woman is still caught in the cycle of violence, when the perpetrator's promises of change and social pressure to forgive are strongest, making that moment especially unsuitable for a process that presumes a settled, autonomous choice.
- **Perpetrator accountability.** Perpetrators of violence against women and girls frequently fail to recognise the unlawfulness of their conduct, and effective perpetrator work requires demanding minimum standards, sustained duration, group settings and specific conditions that are difficult to reconcile with an RJ encounter.

² Council of Europe, Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO). (2022). Mid-term Horizontal Review of GREVIO baseline evaluation reports (paras. 411–412). Council of Europe. <https://rm.coe.int/prems-010522-gbr-grevio-mid-term-horizontal-review-rev-february-2022/1680a58499>.

These concerns are also reflected in GREVIO's findings. GREVIO has expressed concern about the use of restorative justice in cases of domestic violence, rape, stalking and murder, and has called for caution and for the systematic application of safeguards: a risk assessment of the suitability of restorative justice in the individual case; full information on the aims, consequences and non-mandatory nature of the process; judicial verification of the victim's consent; legal representation when such decisions are taken; and dedicated training for mediators in restorative justice centres.

Recommended Strategy actions:

- Steer Member States to treat restorative justice and mediation as generally unsuitable in cases of violence against women and girls and domestic violence, and to exclude their mandatory or diversionary use, in line with Article 48 of the Istanbul Convention. Where restorative justice is nevertheless contemplated in an individual case, require at a minimum the full set of GREVIO safeguards set out above, including a prior suitability and risk assessment and verification of the victim's free and informed consent by the competent judiciary or prosecution authorities, with specialist VAWG expertise.
- Ensure that any proposal or referral to restorative justice in cases of violence against women and girls or domestic violence is subject to a prior, individualised and documented risk assessment by the competent judiciary or prosecution authorities. The assessment should consider the gendered nature of the violence, power imbalances, coercion and control, fear, dependency, threats, stalking, trauma, risk of escalation, and any risks to children. The final decision on suitability should remain with the judiciary or prosecution authorities and should be based on specialist VAWG expertise where relevant.
- Ensure that the judiciary or prosecution authorities verify the victim's free and informed consent, both before referral and after referral, and before any process involving the victim begins. Victims should receive full information, with legal representation and dedicated support, on the nature and consequences of restorative justice, its non-mandatory nature, its implications for criminal and related proceedings, and their right to withdraw consent at any time. Refusal or withdrawal must never negatively affect the victim or her access to justice.
- Ensure that confidentiality does not prevent judicial oversight and accountability. Member States should require the secure documentation and review of referrals, risk assessments, information provided, consent, withdrawal of consent and safeguards applied, while protecting victims' confidentiality and personal data. The restorative justice process should never become a space in which coercion, intimidation or failures to respect safeguards cannot be identified or reviewed.

4. Children as victims in their own right

The VRD recast strengthens the recognition of children as victims in their own right, including children who suffer harm as a result of witnessing a crime, and requires child-friendly, targeted and integrated support that addresses their individual needs. It also introduces important safeguards where the holder of parental responsibility is involved in the offence: where there is a conflict of interest, a child's ability to report cannot be conditional on the consent of the holder of parental responsibility, and the child's best interests must be protected before that person is informed. The recast further requires the best interests of the child and the child's right to be heard to be respected in criminal proceedings, including where an act would otherwise require the consent of the holder of parental responsibility.

For victims of violence against women and domestic violence, these safeguards must be understood together with Article 31 of the Istanbul Convention. Children affected by intimate partner violence are not only in need

of support: decisions on custody and visitation must take the history and risk of violence fully into account and must never jeopardise the safety and rights of the child or the adult victim. This is particularly important where the perpetrator is also the child's holder of parental responsibility, as parental rights and contact arrangements can otherwise become a means of continuing control and exposing both the child and the non-abusive parent to further harm.

The Strategy should therefore promote coherent implementation of the VRD, the Istanbul Convention and the Directive on combating violence against women and domestic violence, ensuring that the recognition of children as victims in their own right is reflected not only in criminal proceedings and support, but also in the protection of their rights and safety in custody and visitation decisions. The Strategy should also ensure that where the holder of parental responsibility is the alleged or identified perpetrator, conflicts of interest are actively identified and safeguards, independent representation and specialist support are available to the child and the non-abusive parent. The VAW Directive's provisions on child support and safe contact are important, but the Strategy should reinforce the more fundamental Article 31 requirement that the violence and the resulting risks are properly addressed in the custody and visitation decision itself.

Recommended Strategy actions:

- Ensure that children affected by violence against women and domestic violence are recognised and treated as victims in their own right, with child-friendly, specialist and integrated support reflecting their individual needs and best interests.
- Ensure that where the holder of parental responsibility is the alleged or identified perpetrator, or where there is otherwise a conflict of interest, the child's rights are not dependent on that person's consent and the child has access to independent representation and support.
- Steer Member States to implement Article 31 of the Istanbul Convention in custody and visitation matters, ensuring that incidents and patterns of violence against women and domestic violence are systematically taken into account and that the exercise of parental or contact rights never jeopardises the safety or rights of the child or the adult victim.

5. Crisis preparedness and the resilience of women's specialist services

The Strategy's planned focus on crisis management is welcome, but crises are not gender-neutral, and neither is crisis preparedness. Evidence from the COVID-19 pandemic and from Russia's war of aggression against Ukraine shows that emergencies and societal shocks intensify violence against women and girls at the very moment services are most at risk, and that it is women's specialist services that hold the line when statutory provision retracts.

The pandemic made this unmistakable. Across the WAVE network, calls to women's helplines rose by around 30% between 2018 and 2020 and by 43% across EU Member States (WAVE Country Report 2021)³. Perpetrators weaponised lockdown itself to deepen control, while women faced higher levels of risk, more severe violence, and shelters constrained by distancing rules. The decisive finding is structural: women's specialist services adapted and expanded to fill the gaps, while many government and universal services retracted, restricted or stopped; yet the services carrying this burden were too often left unsupported. Some states failed even to designate this work as essential, or to make clear that escaping domestic violence was a lawful reason to leave home. The VRD recast's aim that specialist support services "remain fully operational

³ Women Against Violence Europe. (2021, December 20). *WAVE Country Report 2021*. [WAVE Network](#)

in times of crisis” (Article 8(6)) is therefore an important recognition, but only if the Strategy operationalises it, rather than leaving continuity to the same discretion that failed women during the pandemic.

Preparedness must be built on a gender-responsive, human-security foundation. The prevailing EU concept of security remains largely reactive and militarised, whereas real security for women and girls means safeguarding dignity, rights, physical integrity and access to services even in upheaval. Overlapping crises such as war, displacement, pandemics, climate shocks and democratic backsliding intensify violence, deepen economic precarity and push women out of decision-making, with marginalised women hit hardest. Feminist civil society and women’s specialist services are pillars of community-level resilience, yet they are chronically underfunded and routinely excluded from crisis-response planning. Consistent with a human-security approach and a preparedness strategy that keeps women’s needs at the core, the new Victims’ Rights Strategy should ensure that preparedness systematically assesses the differentiated, intersectional impact of crises on women and girls, and that women and the specialist services that support them are active participants in designing crisis prevention, management and recovery, not afterthoughts to it.

Recommended Strategy actions:

- Guarantee the continuity of women’s specialist services in emergencies, designating them as essential services in national and EU preparedness plans, and providing flexible, rapidly accessible emergency funding so they can adapt (Article 8(6)).
- Include WSS and feminist civil society in preparedness, response and recovery planning as pillars of community resilience, with long-term support rather than one-off interventions.
- Embed a gender-responsive, human-security approach across the EU’s security, preparedness and crisis-response policies and funding instruments, assessing the intersectional impact of crises and ensuring women’s meaningful participation as decision-makers, in line with the Women, Peace and Security agenda.
- Close the digital divide in crisis service access, so that remote support reaches migrant, refugee and minoritised women who lack private devices or connectivity.
- Keep justice functioning for victims of VAWG during crises: emergency protection orders, prioritised and remote hearings, and safe forensic practice, while protecting safe child-contact arrangements and avoiding a shift to bail over protection.
- Capture the lessons of COVID-19 in future response plans, building robust collaboration structures between statutory services and WSS for crisis response and recovery.

6. Digital and online violence against women and girls

Technology-facilitated violence against women and girls (TFVAWG) is not a separate phenomenon: it is the digital extension of the same continuum of violence women face offline, amplified in scale and reach, and it disproportionately affects young, racialised, disabled, migrant and LGBTIQ+ women. As WAVE’s expert group on TFVAWG has documented, intersectionality here is not an optional lens but the only framework that explains why some communities suffer compounded digital harms while facing the greatest barriers to protection and justice.

The scale and speed of harm are escalating. Members across Europe report a rapid rise in AI-generated deepfakes and non-consensual intimate image abuse; one dataset records a 550% increase in deepfake

videos between 2019 and 2023, of which 99% target women (Berkeley Haas/UN Women 2024)⁴. Nudification apps and harmful AI tools circulate in a legal “grey zone” through app stores and mainstream advertising; misogynistic “manosphere” content normalises abuse; and online sexual exploitation of minors is growing, with girls coerced through blackmail.

Two structural failures deepen this: platform accountability remains weak and inconsistently enforced, and survivors are left to carry out most of the reporting and removal work themselves, to the point of exhaustion. The burden falls hardest on those already marginalised: migrant women whose digital dependency is weaponised by perpetrators, and women with disabilities, who face technology-specific abuse such as the remote control of assistive devices, rarely addressed in standard training.

AI systems themselves reproduce and scale these inequalities: studies find gender bias in a large share of systems, hate-speech detection tends to over-flag minority users while under-flagging misogynistic content, and the EU AI Act creates a separate, weaker framework for migration-control technologies, which are not classified as high-risk. This exempts the systems deployed where migrant women are most vulnerable, including border surveillance that can block women and girls fleeing violence from reaching asylum and protection. This connects directly to the concerns raised in Sections 1 and 2 about migrant women’s safe access to reporting and support.

Women’s specialist services are already responding by building toolkits, promoting survivor-centred tools and integrating digital safety planning into support, but they do so with little dedicated resourcing, and increasingly need to safeguard their own staff from the harm of sustained exposure to abusive content. The Victims’ Rights Strategy should back this work and press for a digital environment in which victims are not left to fend for themselves.

Recommended Strategy actions:

- Support women’s specialist services to build capacity on TFVAWG by funding training, survivor-support toolkits and safeguarding for staff exposed to abusive content, and promote survivor-centred tools and digital safety planning as a core part of support.
- Ensure coherence with the sectoral and digital acquis, aligning the Strategy with the cyber-violence offences in Directive (EU) 2024/1385, the Digital Services Act and the EU AI Act, and close the gender gaps in AI governance, including mandatory impact assessments for violence against women and girls and “safety by design” in new technologies, and mandatory labelling of AI-generated content.
- Guarantee adult survivors the same level of legal protection and reporting mechanisms as currently exist for children, with dedicated, clear reporting and rapid-removal channels for TFVAWG and deepfakes on all major platforms, and stronger cross-border cooperation on image removal and perpetrator accountability.
- Address the accountability gap in migration AI, so that surveillance and screening systems cannot obstruct women and girls fleeing violence from accessing protection and asylum.
- Put prevention at the centre alongside reactive responses by addressing the attitudes of men and boys and the “manosphere”, embedding consent, digital and rights literacy and sexual-violence education in school curricula, co-designed with young women, and consistently framing TFVAWG as part of the continuum of violence against women and girls in EU communications.

⁴ UN Women. (2023). *AI-powered online abuse: How AI is amplifying violence against women and what can stop it*. UN Women. (Citing data from Home Security Heroes, 2023).

7. Sustainable funding for women's specialist services

Sustainable funding is the weakest point of the VRD recast: it offers only a generic resourcing clause, that Member States “shall ensure sufficient human and financial resources ... without prejudice to ... budgetary autonomy” (Article 28b), and a soft recital directing “special attention” to helplines and general and specialist services, including those run by NGOs (Recital 35).

The evidence for investment, however, is decisive. EIGE estimates that gender-based violence costs the EU €366 billion a year, of which violence against women accounts for €289 billion (EIGE)⁵. Studies from the UK and Italy indicate that every €1 invested in women's specialist services returns several times its value in social terms, up to £11 in one analysis and a social return of €7.15 per €1 in an Italian study (WAVE Agents of Change)⁶. Underfunding WSS is the expensive option: it shifts higher costs onto police, health and justice, and forces services to limit support to crisis response. Investing in women's specialist services also strengthens the effectiveness of justice systems: it encourages reporting, builds trust in institutions and reduces cycles of harm. There is a growing evidence base on the impact of victim support and protection on effective criminal justice systems, and WAVE can contribute to it.

Recommended Strategy actions:

- Link the Strategy to dedicated, sustainable EU funding for women's specialist services under the relevant programmes and the next Multiannual Financial Framework, recognising that the effectiveness of the rights in the VRD depends on adequately funded services, including women's specialist services. **We note that the Strategy carries no resources of its own and that implementation funding will depend on the MFF now under negotiation; the Strategy should nonetheless make the case for it.**
- Recognise that private and donor funding cannot substitute for sustainable public investment, and protect the unique approach of women's specialist services.

8. Data, monitoring and governance

The Strategy's consultation and governance arrangements must reflect the diversity of victims and of the organisations that support them. Victim Support Europe is one example among many, and cannot on its own represent victims of all crimes. WAVE's expectation is that the Victims' Rights Platform, and every consultation channel the Strategy relies on, value the input of all civil society organisations equally, and do not assume that consulting a single umbrella organisation is equivalent to consulting the specialist organisations that provide frontline support. This is a matter both of the equal treatment of all civil society organisations and of the equal representation of victims of all crime types, and it requires that specialist knowledge be conveyed by specialist organisations rather than filtered through umbrella bodies.

The Strategy also looks to strengthen the role of Justice and Home Affairs agencies in cross-border cases involving large numbers of victims, including online crimes. Women's specialist services should be connected to these mechanisms, not bypassed by them.

Recommended Strategy actions:

⁵ European Institute for Gender Equality (EIGE), *The Costs of Gender-Based Violence in the European Union* (Vilnius: EIGE, 2021), [EIGE Costs of Gender-Based Violence Report](#).

⁶ Women Against Violence Europe (WAVE) Network, *Agents of Change: Women's Specialist Services and Their Feminist, Multi-Level Approach to Tackling Violence Against Women and Girls* (Vienna: WAVE, 2026), [WAVE Agents of Change Study](#).

- Ensure that the Victims' Rights Platform and the Strategy's consultation mechanisms give equal weight to the input of all civil society organisations, guarantee the representation of victims of all crime types, and secure specialist knowledge directly from specialist organisations, including women's specialist services and WAVE, rather than assuming that consulting one umbrella organisation suffices.
- Involve women's specialist services in the work of relevant Justice and Home Affairs agencies: as training partners for CEPOL, as a source of sex-disaggregated evidence for the FRA, and in cross-border coordination through Eurojust and the European Network on Victims' Rights.
- Ensure continuity of protection for women who move between Member States, including the effective operation of the European Protection Order in cross-border cases.
- Promote the collection of sex-disaggregated administrative and prevalence data (building on VRD Article 28) and support femicide-watch mechanisms and femicide reviews, in line with GREVIO's recommendations.
- Ensure women's specialist services, including WAVE, are represented on the Victims' Rights Platform, and align the Strategy's monitoring with GREVIO monitoring and the monitoring of Directive (EU) 2024/1385, recognising WSS as accountability and shadow-reporting partners, not merely service contractors.

9. International cooperation and enlargement

The Strategy treats international cooperation, including with candidate countries and potential candidates, as essential, and ties victims' rights to the EU's enlargement policy. WAVE is well placed to contribute here: our network spans 46 countries, including EU candidate and potential candidate states, where women's specialist services are often building provision from a low base and under significant political and financial pressure. A Strategy that supports the development of WSS and their alignment with Istanbul Convention standards in these contexts will strengthen both victims' rights and the integrity of the accession process itself.

Recommended Strategy actions:

- Support the development of women's specialist services, and their alignment with Istanbul Convention standards (Articles 22 to 25), in candidate and potential candidate countries, drawing on WAVE's network and expertise.
- Ensure that cooperation with international and regional partners, in particular the Council of Europe and GREVIO, reinforces rather than duplicates existing monitoring, and that specialist women's organisations are included in these exchanges.

Conclusion

WAVE stands ready to contribute its expertise, and the experience of its members, to the development and implementation of the new Victims' Rights Strategy. The single most important contribution the Strategy can make is to ensure coherence. This is also the Strategy's own stated aim: to ensure the coherent transposition of complementary provisions stemming from recent sectoral legislation, expressly including the Directive on combating violence against women and domestic violence. WAVE asks the Commission to hold to that aim, so that the general framework consolidated by the revised Victims' Rights Directive reinforces, rather than

dilutes, the specialist support that women victims of violence are entitled to under the Istanbul Convention and Directive (EU) 2024/1385.

We caution firmly against gender-neutral approaches, which erase the disproportionate impact of violence on women and girls and shift recognition, referrals and resources from feminist specialist services to generic providers. Women's specialist services are not a cost to be trimmed. They are the infrastructure through which the EU's own laws reach the women they are meant to protect, and behind every major advance in women's rights stands a women's specialist service.