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**EDF feedback on the roadmap on Supporting crime victims – evaluation of the Victims’ Rights Directive**

The European Disability Forum, umbrella organisation defending the rights of over 100 million persons with disabilities in the EU welcomes the upcoming evaluation of the Victims’ Rights Directive by the European Commission.

Despite the adoption of the Victims’ Rights Directive and related legal framework, many victims in the EU are not granted their rights. Even when measures are available, they are often inaccessible to victims with disabilities. Persons with disabilities face difficulties reporting crimes, accessing support measures and services, and exercising their rights to a criminal proceeding and support throughout.

Physical and/or communication barriers make crimes difficult to report, and myths and stereotypes prevent persons with disabilities from being considered credible by the police and the criminal justice system. Persons with disabilities are often not aware of the legal remedies available or are afraid of stigmatisation and victimisation. States also fail to provide victims’ services accessible to persons with disabilities, from lack of (or inaccessible) information on their rights to inaccessible helplines and shelters. In the criminal proceedings itself, persons with disabilities often do not receive appropriate procedural accommodation and, in many instances, court buildings are not accessible to people with reduced mobility.

Women with disabilities are particularly affected as they are more at risks of being victims of crimes, including sexual and domestic violence, and excluded by the justice system.

We call on the European Commission to particularly examine the specific gaps faced by victims with disabilities in the evaluation of the Victims’ Rights Directive.

The evaluation should look at the following issues:

* Whether existing **EU policies** to support the implementation of the Victims’ Rights Strategy are inclusive of persons with disabilities and contribute to the implementation of the UN Convention on the Rights of Persons with Disabilities, ratified by the EU and all its Member States.
* Whether existing **national legislation and policies on victims’ rights** include the rights of persons with disabilities, and **mandatory provision of accessibility and reasonable accommodation** for victims with disabilities in the criminal justice system and in victim support services, in line with articles 3-7, 22-23 and articles 8-9 of the Directive, including:
	+ Whether **existing victims support services**, such as helplines and shelters, are accessible to victims with disabilities, in particular women and girls with disabilities;
	+ Whether victims of crimes with disabilities, especially women and girls with disabilities victims of domestic violence, have an equal **right to avoid contact with the offender** in line with article 19 of the Directive, including when the offender is a legal guardian or carer;
	+ Whether the rights of **children with disabilities** victims of crime are guaranteed in the national legislation and policies, in line with article 24 of the Directive.
* Whether EU Member States adopted **measures to raise awareness on the rights of victims with disabilities**, including women and children with disabilities victims of violence, and to combat stereotypes that hinders their rights, including through the **training of practitioners**, in line with article 25 of the Directive.
* Whether EU Member States collect **disaggregated data on victims**, including by disability, age and gender, to evaluate the implementation of the Directive and adopt targeted measures to support disadvantaged groups of victims, in line with article 28 of the Directive.