



Recommendations on the EU Strategy on victims' rights

European Disability Forum Position Paper
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**A call for an ambitious and disability inclusive EU
Strategy on victims' rights post 2026**

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Table of Contents

Table of Contents	2
The European Disability Forum	2
Summary	2
1. Procedural accommodation and access to justice	3
2. Safe reporting for persons with disabilities living in closed settings...	5
3. Accessible victim-support services.....	6
4. Accessible information and awareness	8
5. Participation, monitoring and accountability.....	9
Document credits	10

The European Disability Forum

The European Disability Forum is an independent NGO that advocates for the rights of 100 million Europeans with disabilities. EDF is a unique platform which brings together representative organisation of persons with disabilities from across Europe. EDF is run by persons with disabilities and their families. We are a strong, united voice of persons with disabilities in Europe.

Summary

The European Disability Forum (EDF) welcomes the preparation of a new EU Strategy on Victims' Rights. Persons with disabilities face an increased risk of becoming victims of crime, including violence¹, abuse, exploitation, hate crime² and gender-based violence³. They also continue to encounter significant barriers when reporting crimes, accessing victim-support services, participating in criminal proceedings and obtaining effective remedies⁴.

These barriers include

- inaccessible information and communication;
- inaccessible police stations and courts;

¹ FRA, [Report "Places of Care = Places of Safety? Violence against persons with disabilities in institutions"](#), 2025.

² EDF, [Position Paper and Recommendations on hate speech and hate crimes against persons with disabilities](#), 2026.

³ EDF, [Position paper on Violence against women and girls with disabilities in the European Union](#), 2021.

⁴ EDF, [Recommendations on the EU Strategy on Victims' Rights \(2020-2024\)](#), 2020.

- the lack of procedural accommodation,
- discriminatory stereotypes regarding the credibility of persons with disabilities,
- and the absence of accessible and confidential reporting mechanisms.

Women and girls with disabilities, children with disabilities, persons with intellectual or psychosocial disabilities, persons living in institutions and persons deprived of their legal capacity may face particularly serious and intersecting forms of discrimination.

The new Strategy should therefore **explicitly recognise persons with disabilities as rights holders** and ensure that they can exercise their rights on an equal basis with others. It should be fully aligned with the EU Charter of Fundamental Rights, the revised Victims' Rights Directive, the European Accessibility Act and the UN Convention on the Rights of Persons with Disabilities (CRPD), in particular Articles 12, 13, 16 and 19. The EU and all its Member States are notably bound by the CRPD, which requires the elimination of barriers to justice and the provision of appropriate support and accommodation for persons with disabilities.

EDF recommends that the Strategy includes the following measures:

- 1. EU guidelines on procedural accommodation for victims with disabilities;**
- 2. Disability-inclusive actions to improve identification and reporting of crime in closed and segregated settings;**
- 3. Actions on accessibility of victim-support services, including an assessment of national helplines;**
- 4. EU-wide awareness campaign on victims' rights that explicitly includes victims with disabilities;**
- 5. Actions to strengthen participation, monitoring and accountability,** including by broadening participation in the Victims' Rights Platform, to additional representative organisations of persons with disabilities, and through the creation of a monitoring system for the Strategy.

We give more information about what each measure would entail below.

1. Procedural accommodation and access to justice

The European Commission should develop **EU guidelines on procedural accommodation for victims with disabilities** in accessing justice, including the police, prosecution services, courts and other justice bodies (as foreseen in the new phase of the Strategy on the Rights of Persons with Disabilities). These guidelines should explain the difference between

procedural accommodation and reasonable accommodation, and be developed in close consultation with organisations of persons with disabilities, including those representing specifically women with disabilities and organisations representing persons with intellectual and psychosocial disabilities.

This **would support the implementation of Article 26c of the revised Victims' Rights Directive**, which now requires Member States to ensure that reasonable accommodation and procedural accommodation is provided for victims with disabilities upon request.

The guidelines should:

- Set out minimum standards for procedural accommodation throughout the entire criminal process, from the first contact with the authorities until the conclusion of proceedings and enforcement of decisions.
- Clarify that procedural accommodation is an enforceable right and must not depend on the person's legal capacity, diagnosis or ability to communicate in conventional ways.
- Cover, among other measures, accessible communication, additional time, breaks, simplified explanations, the use of augmentative and alternative communication, professional and qualified sign-language interpretation, deafblind interpretation, communication assistance and support persons chosen by the victim.
- Ensure that victims may give evidence through video-link or other appropriate means where this is necessary to enable their participation and prevent secondary victimisation.
- Require individual assessments of the victim's support and protection needs without relying on general assumptions about a particular disability.
- Ensure that procedural accommodation is age-, gender-, disability-language- and culturally appropriate.
- Guarantee that victims can participate independently and that a guardian, representative, family member or institutional staff member cannot replace the victim's own will and preferences.
- Ensure access to independent legal advice, legal aid and an independent support person (especially in the case where the alleged perpetrator is a family member, guardian, carer or staff member of an institution).

The Commission should support the implementation of these guidelines through:

- Dedicated **training sessions** for police officers, prosecutors, judges, lawyers, victim-support professionals and other justice-sector practitioners.
- **Peer-learning and exchange of practice** between Member States, including in ad-hoc meetings of the Victims' Rights Platform.
- An **EU network** of experts and organisations of persons with disabilities on procedural accommodation and access to justice.
- **Model protocols and checklists for national authorities.**
- **EU funding** for pilot projects that test accessible justice procedures.

2. Safe reporting for persons with disabilities living in closed settings

The Strategy should include **specific actions to improve identification and reporting of crime in closed and segregated settings**. This should include residential institutions, psychiatric and mental-health facilities, disability-specific institutions, daycare and occupational centres, detention facilities, immigration and asylum centres, and other settings where persons with disabilities may be dependent on the institution or its staff.

This would support the **implementation of Article 5a(5) of the revised Victims' Rights Directive**, which requires Member States to ensure victims in closed and segregated settings can effectively report crimes, including those in "specialised accommodation centres for persons with disabilities".

The actions, which could include the development of a study, protocols and peer-support discussion, must call on and support Member States to:

- Establish confidential, accessible and independent mechanisms for reporting crimes inside institutions and other closed settings.
- Ensure that complaints can be made directly by the victim or by a third party, including an independent advocate/support person, without requiring authorisation from institutional staff, a guardian or another representative.
- Provide several reporting channels, including in-person, telephone, text message, online, video and other accessible formats.
- Ensure that information about the reporting mechanisms and the reporting itself is available in easy-to-read format, Braille, sign languages and other appropriate communication formats.

- Guarantee protection against retaliation, reprisals, institutional discharge, loss of support or other negative consequences following a complaint.
- Ensure the immediate referral of victims to independent support services, medical care, psychosocial assistance and legal advice.
- Require independent monitoring bodies to conduct regular and unannounced visits to institutions and other closed settings.
- Establish clear duties to investigate allegations promptly, impartially and effectively, including allegations involving institutional staff, guardians, family members or service providers.
- Ensure that institutional negligence, concealment, complicity and failure to report are subject to appropriate sanctions.
- Collect data on reported crimes, investigations and outcomes, disaggregated by disability, gender, age and type of setting, while respecting data-protection and confidentiality requirements.

The Commission should promote cooperation between Member States, independent monitoring bodies, equality bodies, national human rights institutions, victim support services and organisations of persons with disabilities.

3. Accessible victim-support services

The Strategy should support Member States in ensuring that all general and specialised victim-support services are accessible and inclusive of persons with disabilities. Accessibility should be understood broadly and include physical, sensory, intellectual, psychosocial, communication and digital accessibility.

This would **support the implementation of Article 26c(1) and (2) of the revised Victims' Rights Directive**, that requires Member States to ensure accessibility and access to support services by victims with disabilities.

EDF recommends that the Commission calls for, and supports:

- Accessible national victim-support helplines that can be contacted by telephone, real-time text⁵, total conversation (this is video, audio and real-time text on the same call), through relay services⁶, and

⁵ Real time text' means a form of text conversation where the text being entered is sent in such a way that the communication is perceived by the user as being continuous on a character-by-character basis. It is legally required by the European Accessibility Act for electronic communication and for emergency communication through the 112 European number.

⁶ Relay services refer to interpreting services which enable two-way communication by using, for example, text or sign language.

other accessible digital channels. Under the Strategy, the Commission should also evaluate the accessibility of national helplines and call on Member States to ensure their accessibility. Accessibility should be assessed for each group of persons with disabilities concerned.

- Physically accessible shelters and safe accommodation, including for women with disabilities who require personal assistance, mobility support, accessible facilities, access to national sign language, or support with communication;
- Mental health services, including tailored and accessible support, delivered through a human rights-, disability-, trauma-, age- and violence-informed, and culturally appropriate approach;
- Accessible information about available services, reporting channels, protection measures, compensation and legal remedies;
- Free, confidential and independent legal advice, support and psychosocial support;
- Victims support services that are available in rural, remote and cross-border areas;
- Services that are inclusive of women and girls with disabilities who experience domestic violence, sexual violence, trafficking, forced sterilisation, forced abortion, harassment or other forms of gender-based violence.
- Personal assistance, professional and qualified sign language interpretation, and communication support where these are necessary for the victim to participate in support services or legal proceedings;
- Support services based on the victim's free and informed consent, autonomy, will and preferences;
- The involvement of organisations of persons with disabilities, including organisations of women with disabilities, and specialised support services, in the design, delivery and evaluation of services.

EU funding should prioritise inclusive, community-based and rights-based services, and should not reinforce segregation or institutionalisation. This also means that support services, including shelters, should be inclusive and accessible to persons with disabilities- there should be no institutionalisation of persons with disabilities as "safety measure". Services for victims of gender-based violence and women-led services must be accessible to women and girls with disabilities. Funding calls should contain specific accessibility requirements and should support the participation of representative organisations of persons with disabilities.

4. Accessible information and awareness

The European Commission should develop an **EU-wide awareness campaign on victims' rights that explicitly includes victims with disabilities**. The campaign should make victims with disabilities visible in all their diversity, while avoiding stereotypes, pity-based narratives and/or representations of persons with disabilities solely as vulnerable persons.

The [Keep Your Eyes Open](#) campaign under the previous Strategy did not take this into account, as persons with disabilities were not represented, and the campaign did not seem to include materials in formats that are accessible for persons with disabilities.

The new campaign should:

- Explain how to recognise and report different forms of crime and violence.
- Inform victims about their rights to support, protection, legal advice, procedural accommodation and compensation.
- Include the experiences and perspectives of persons with disabilities, particularly women and girls with disabilities.
- Be available in all EU languages and in accessible formats, including easy-to-read language, plain language, pictograms, captioning, audio description, the 29 national sign languages, Braille and screen-reader-compatible digital formats.
- Comply with applicable EU accessibility standards, including EN 301 549 for digital information and communication, or EN 17210 for accessibility of the built environment.
- Be disseminated through police services, courts, healthcare providers, schools, social services, equality bodies, disability organisations and institutions.
- Include information specifically designed for persons living in institutions and other closed settings.
- Address professionals and the general public, as well as victims themselves.

Accessibility should be integrated from the beginning of the design process and should not be treated as an additional or optional component. All campaign materials should be tested with persons with different disabilities before publication.

5. Participation, monitoring and accountability

The Commission should **strengthen the work of the EU Victims' Rights Platform, and broaden participation by including additional representative organisations of persons with disabilities**, notably organisations representing women with disabilities, children with disabilities, persons with intellectual or psychosocial disabilities and persons living segregated in residential institutions.

The Strategy should also establish structured opportunities for consultation with persons with disabilities who have lived experience of crime and violence. Their participation should be supported through accessible meetings, professional and qualified sign language interpretation, communication assistance, reimbursement of costs and appropriate remuneration where relevant.

EDF recommends:

- **Regular thematic discussions**, including on the topics of victims of violence against women and domestic violence, reporting and support of victims in closed settings, procedural accommodation and access to compensation.
- The **integration of disability and gender equality across all priorities and implementation measures of the Strategy**.
- **Regular monitoring of the implementation of victims' rights** (both of the upcoming strategy⁷ and the revised directive) with indicators specifically addressing accessibility, procedural accommodation, reporting and support for persons with disabilities.
- **Collection of comparable, disaggregated data** on victims of crime, including by disability, gender, age, type of crime, place where the crime occurred and relationship with the perpetrator.
- **Promotion of disability rights and accessibility in EU-funded projects** concerning victims' rights and access to justice.

EDF calls on the Commission to ensure that the Strategy is consistent with the [EU Strategy for the Rights of Persons with Disabilities up to 2030](#) and with the EU's obligations under the CRPD.

The [EDF position paper on the previous Strategy for 2020-2024](#) contains detailed recommendations on participation, accessible services, information, procedural accommodation, training, monitoring, sanctions, data collection and research. Many of these recommendations remain applicable and should be carried forward into the new Strategy.

⁷ See the [monitoring framework](#) the Commission established under the Strategy on the rights of persons with disabilities.

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