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These are the views of:	<i>Welsh Women's Aid (Third Sector) - the national charity in Wales working to end domestic abuse and all forms of violence against women.</i>

About Welsh Women's Aid

Welsh Women's Aid is the umbrella organisation in Wales that supports and provides national representation for independent third sector violence against women, domestic abuse, and sexual violence (VAWDASV) specialist services in Wales. Our membership comprises of 20 specialist support services. These services deliver lifesaving and life-changing support and preventative work in response to violence against women, including domestic abuse and sexual violence against children and young people, men and boys, trans and non-binary people, as part of a network of UK provision.

As an umbrella organisation, our primary purpose is to prevent domestic abuse, sexual violence, and all forms of violence against women and ensure high quality services for survivors that are needs-led, gender responsive and holistic. We collaborate nationally to integrate and improve community responses and practice in Wales. We also award the Wales National Quality Service Standards (NQSS), a national accreditation framework for domestic abuse specialist services in Wales (supported by the Welsh Government) as part of a UK suite of integrated accreditation systems and frameworks. (More information on the NQSS can be found [here](#)).

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Consultation on the new Victims' Code

Questions 1A to 1F:

Question 1A: Does the new information, in the blue box in Right 1 entitled 'When and how your needs will be assessed' help victims to understand how their needs will be assessed?'

Yes, we broadly welcome the inclusion of this information and consider it to be a clear and accessible explanation of how victims' needs will be assessed.

However, we would welcome further clarity regarding the format and delivery of the assessment. It is not currently clear whether this is intended to be a discrete, structured interaction or whether it will take place more informally throughout ongoing engagement with police, Independent Domestic Violence Advisors (IDVAs), or other professionals. Greater clarity on this point would help to manage expectations and provide reassurance to victims at what is often a highly uncertain stage.

We would also welcome further detail on what is meant by needs being considered on an ongoing basis. In particular, clarification is needed as to how this will operate in practice, including whether needs will be actively reviewed at each point of contact and how changes will be recorded and acted upon. Without this clarity, there is a risk that the principle of ongoing assessment is not consistently implemented.

Question 1B: Do you think needs assessments occur at the right stages of the criminal justice process (those stages are when a victim first engages with the police, during the investigation of the crime, and before giving evidence)?

Yes, we agree that the identified stages represent appropriate points within the criminal justice process to assess victim's needs.

However, it is essential that needs assessment is understood as a continuous and responsive process rather than one limited to fixed stages. Victims' needs may evolve significantly over time, particularly as cases progress or as new developments arise. A system that is able to respond flexibly to these changes is therefore critical to ensuring equitable and effective support.

Studies have highlighted the importance of regular contact with the police, with [a report](#) highlighting research that whilst most victims were satisfied with their initial contact with the

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police, their levels of satisfaction declined as the case continued, due to the lack of contact until charges were made and if the victim was wanted as a witness¹.

At the same time, it is important to balance responsiveness with sensitivity. Repeated or duplicative questioning may risk re-traumatising victims or creating a perception of being subject to a procedural “tick-box” exercise. A trauma-informed approach should therefore seek to minimise unnecessary repetition while maintaining the ability to respond to changing needs. We provide further comments regarding needs assessments at the end of the criminal justice process in response to Question 1D.

Question 1C: Do you think they cover the right information to inform necessary adjustments to the services provided to victims?

Yes, we consider that the proposed assessments broadly capture the relevant information required to inform necessary adjustments to services.

However, the effectiveness of these adjustments will depend heavily on the ability of agencies to share and act upon information appropriately. This includes coordination between police, witness care units and other relevant services. Effective information sharing is fundamental to enabling agencies to respond appropriately to victims’ needs. Evidence from Multi-Agency Risk Assessment Conferences (MARACs) indicates that coordinated information sharing allows agencies to build a more comprehensive understanding of risk, leading to more effective safety planning and improved outcomes for victims².

Robust systems for information sharing are essential, but these must be proportionate and carefully managed to avoid unnecessary administrative burden or delays. In addition, agencies must retain the flexibility to respond dynamically to changes in victims’ needs, rather than relying solely on static assessment outcomes.

Question 1D: Do you think there could be a further needs assessment at the end of a case? If yes, what information could this cover and how could that information be used?

¹ Shapland, J., Willmore, J. and Duff, P. (1985) Victims in the Criminal Justice System. Aldershot: Gower.

² Steel, N., Blakeborough, L. and Nicholas, S. (2011) Supporting high-risk victims of domestic violence: A review of Multi-Agency Risk Assessment Conferences (MARACs). London: Home Office. Available at: <https://assets.publishing.service.gov.uk/media/5a7a0309e5274a319e77736e/horr55-report.pdf> (Accessed: 28 April 2026).





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Yes, we support the inclusion of a further needs assessment at the conclusion of a case. This provides an important opportunity to assess victims' wellbeing following the criminal justice process, which can be lengthy and emotionally demanding. It also enables appropriate signposting to ongoing support services where required.

In addition, a post-case assessment could support learning and service improvement by capturing victims' experiences and identifying areas for development across agencies. This function should be clearly recognised as part of a continuous improvement approach rather than solely an administrative step.

Question 1E: What could agencies do to make sure that needs assessments are undertaken in a quality and trauma-informed way?

It is essential that needs assessments are conducted in a trauma-informed, compassionate and person-centred manner. Victims should not feel that they are being processed through a purely procedural exercise. Instead, assessments should be delivered in a way that prioritises dignity, respect and emotional safety. Research³ has shown that working with survivors as individuals is crucial to improving outcomes of victims and reducing risks of revictimisation.

Achieving this requires investment in comprehensive and ongoing training for all staff involved in conducting assessments, ensuring they are equipped to respond sensitively to a wide range of needs. In addition, quality assurance mechanisms should be embedded to monitor practice and ensure consistency across agencies.

Question 1F: What role could the Code have in facilitating needs assessments being undertaken in a quality and trauma-informed way?

The Code has an important role in establishing clear expectations regarding the standard and delivery of needs assessments, including the requirement for a trauma-informed approach.

However, effective implementation will depend on sufficient resourcing, including time for meaningful engagement and appropriate staff training. Without this, there is a risk that assessments become superficial and less effective in practice. We also highlight the importance of ensuring that individuals who are not eligible for a Registered Intermediary or statutory

³ Nichols, A.J. (2013) 'Survivor-defined practices to mitigate revictimization of battered women in the protective order process', *Journal of Interpersonal Violence*, 28(7), pp. 1403–1423. doi:10.1177/0886260512468243.





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support are not overlooked. There is a risk that some victims may fall between eligibility thresholds, despite experiencing significant vulnerability.

Finally, it is essential that information gathered through needs assessments is used solely to support victims and is not used in ways that could undermine their credibility or restrict access to services.

Questions 2A to 2I

Question 2A: Do you think a framework guiding criminal justice agencies' engagement with children should be introduced?

Yes. We strongly support the introduction of a formal framework guiding criminal justice agencies' engagement with children. Within the context of VAWDASV, a standardised framework is essential to move beyond treating children as "secondary witnesses" and instead recognise them as victims in their own right, as mandated by the *Domestic Abuse Act 2021*. From a trauma-informed perspective, the current inconsistency in how agencies interact with children can act as a "threat cue," causing secondary victimisation and stalling a child's psychological recovery. A formal framework must mandate predictability and safety, ensuring that communication is not merely age-appropriate but developmentally sensitive, recognising that trauma often causes emotional regression.

Critically, this framework must provide safeguards where the non-abusing parent's capacity is compromised, ensuring children have an independent right to specialist advocacy (such as an IYPA or CHIDVA). By codifying these requirements, the criminal justice system can shift from a "one-size-fits-all" administrative approach to a needs-led, trauma-responsive model that prioritises the child's stability, agency, and long-term wellbeing over mere procedural compliance.

Question 2B: Do you agree with the proposed framework for how criminal justice agencies could engage with children?

No. We cannot support the framework as currently proposed because its rigid reliance on chronological age tiers (under 12, 12–15, and 16–17) fails to account for the impact of developmental trauma on children and young people surviving domestic abuse and sexual

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violence. Trauma often causes emotional regression, meaning a child's chronological age is an unreliable indicator of their capacity to process complex legal information.

Furthermore, by defaulting to parental engagement for younger children, the framework risks silencing victims in cases where the non-abusing parent's capacity is compromised by their own trauma or the ongoing influence of the person causing harm. We advocate for a needs-led framework that presumes a right to independent specialist advocacy (IYPA/CHIDVA) for all children. This would ensure that engagement is adapted to the child's functional developmental stage and psychological "window of tolerance," rather than an arbitrary age bracket, thereby preventing secondary victimisation and ensuring the child's voice is heard directly and safely.

Question 2C: Do you think the proposed age categories that are being used to guide criminal justice agencies' engagement with child victims are the right ones?

No. We do not agree that the proposed age categories are appropriate for guiding engagement with child victims. This chronological approach ignores the well-documented reality of developmental trauma, which frequently causes emotional regression in children and young people surviving domestic abuse and sexual violence. A rigid age-based hierarchy fails to account for a child's actual functional capacity or their "window of tolerance" when under the stress of criminal justice proceedings. Furthermore, defaulting to parental mediation for those under 12 is potentially detrimental in VAWDASV contexts, as it can inadvertently obscure the child's independent voice and lived experience. We advocate for a needs-led approach that prioritises developmental stage over date of birth, ensuring that communication is adapted by specialists who understand the neurobiological impacts of trauma and can facilitate safe, direct engagement regardless of the child's numerical age.

Question 2D: Do you think the right level of engagement is reflected in each category, for example a presumption of direct engagement with 16- and 17-year-olds?

No. We do not believe the proposed levels of engagement reflect the complexity of a child's needs in VAWDASV cases. Specifically, while we support the principle of direct engagement for 16- and 17-year-olds, a "presumption" of direct contact without the guaranteed presence of a specialist advocate ignores the significant risk of secondary trauma and digital or physical retaliation. For those under 12, the level of engagement is too distant; by defaulting to parental mediation, the system fails to account for instances where the caregiver's own trauma or relationship with the person causing harm may silence the child's independent voice. A truly trauma-informed Code would ensure that at every age level, the "right level of engagement"

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includes a mandate for specialist advocacy (IYPA/CHIDVA). This ensures that engagement is not just a transfer of information, but a managed, safe, and developmentally appropriate process that prioritises the child's safety and emotional regulation over procedural efficiency.

Question 2E: Are there any circumstances in which the proposed framework for how criminal justice agencies engage with children should not apply?

Yes. The framework should not apply in circumstances where its implementation would compromise the child's safety or psychological stability. Specifically, in VAWDASV cases, the presumption of parental mediation for younger children must be bypassed if the non-abusing parent is experiencing coercive control or trauma-related incapacity, which could inadvertently silence the child or risk the person causing harm accessing sensitive information.

Furthermore, the framework's procedural timelines should not apply if a child is acutely dysregulated or in a state of trauma-induced crisis; in these moments, clinical and therapeutic needs must override administrative updates. Finally, the framework must be flexible enough to be suspended in favour of a bespoke safety plan for children with complex neurodivergence or those facing contextual safeguarding risks, such as community-based retaliation. A trauma-informed Code must ensure that the "best interests of the child" is a dynamic assessment that can supersede the framework at any time.

We recognise that in certain contexts, including where there have been significant institutional failings, children and families may experience a lack of trust in criminal justice agencies. It is therefore important that the framework allows for flexibility, including the involvement of trusted independent or specialist organisations to support engagement.

Question 2F: Please provide your views on what agencies could do to make sure that direct engagement with children is undertaken in a quality and trauma-informed way.

To ensure direct engagement is undertaken in a quality and trauma-informed way, criminal justice agencies must prioritise psychological regulation over procedural efficiency. We recommend a "Joint Engagement Model" where direct contact is always facilitated by an Independent Young Person's Advocate (IYPA) who can act as an emotional anchor and "translate" the process into developmentally safe language. Agencies must also shift engagement to "neutral" spaces that minimise threat cues and utilise "Regulation Before Representation" protocols—ensuring a child is emotionally grounded before information is sought or delivered.

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Finally, quality must be monitored through child-led feedback mechanisms that measure the child's sense of safety and agency, rather than just the speed of the interaction. This approach recognises that for a CYP survivor of VAWDASV, the *manner* in which they are treated by the system is a critical component of their long-term healing.

Question 2G: Do you think the specific sections detailing what child victims can expect should be included in the Code? (as yellow boxes throughout)

Yes. We support the inclusion of specific sections for child victims, provided they are designed through a trauma-informed lens rather than just a formatting one. These sections are vital for making rights visible and accessible to children and their advocates. However, to be truly effective for CYP survivors of VAWDASV, these "boxes" must use child-friendly, empowering language that avoids re-traumatising terminology. They should also serve as a gateway to multi-modal resources, such as QR codes leading to age-appropriate video explainers.

Furthermore, the Code must be explicit that these sections represent statutory requirements, not just "best practice" guidance, ensuring that the child's rights are integrated into the core delivery of justice rather than being treated as an optional add-on. We recommend that the design of these sections be co-produced with young survivors to ensure the tone and content genuinely meet their needs for clarity and safety.

Question 2H: In general, do you think that the impact of a crime on victims under the age of 12 should be relayed by a parent or guardian (for example, by making a Victim Impact Statement on the child's behalf)?

No. We strongly disagree with the presumption that the impact of a crime on a child under 12 should be relayed by a parent or guardian. In the context of VAWDASV, a child's experience of trauma is distinct from that of the adults around them. Relying on a parent to narrate that experience risks filtering the child's voice through the parent's own trauma or, in cases of coercive control, silencing the child entirely to avoid further conflict with the person causing harm. To be truly trauma-informed and compliant with the *Domestic Abuse Act 2021*, the Code must ensure that children are supported by independent specialist practitioners to express their own impact in age-appropriate ways-such as through play, art, or specialised interviews. This restores agency to the child and ensures the court receives an accurate account of the child's unique psychological and developmental harm, rather than a secondary account provided by a caregiver.

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Question 2I: Please tell us if there is anything else that could be included in a yellow box in the Code to set out provision specific to child victims.

Beyond existing provisions, we recommend that the "Yellow Boxes" include a specific right to Digital Safety Planning, acknowledging that for CYP, protection from the person causing harm must extend to social media and gaming platforms. Additionally, there should be a mandatory provision for a "Safety Stop," empowering children to pause legal proceedings or interviews if they feel emotionally dysregulated. Crucially, these boxes should explicitly define the role of Independent Specialist Advocacy, ensuring the child knows they have a right to a professional who is independent of the police and social services.

Finally, the Code should include a child-friendly feedback mechanism-such as a QR code, allowing young victims to directly and safely report when their rights under the Code are not being met. These additions would transform the boxes from passive information points into active tools for safeguarding and agency.

Questions 3A to 3G

Question 3A. What information would be most valuable for victims going through the criminal justice process including during the investigation and pre-trial to access on a digital service?

We believe that a digital service could provide significant value to victims by offering timely, accessible and clearly presented information throughout the criminal justice process. As a report supported by the Victims' Commissioner in 2016 states "The basic provision of timely information can assist victims in coping with the impact of victimisation. A lack of information can only act to aggravate these symptoms and in many cases can result in victims disengaging with the criminal process and withdrawing their co-operation."⁴

Key information should include details of upcoming appointments and key dates (such as witness meetings, pre-trial hearings and trial dates), alongside updates on the progress of the investigation and indicative timelines for different stages. The inclusion of visual guides to the

⁴ Wedlock, E. and Tapley, J.D. (2016) What works in supporting victims of crime: A rapid evidence assessment. London: Victims' Commissioner for England and Wales. Available at: <https://victimscommissioner.org.uk/document/what-works-in-supporting-victims-of-crime-a-rapid-evidence-assessment/> (Accessed: 26 April 2026).





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process would be particularly helpful in supporting understanding. It would also be beneficial for the service to include clear information on victims' rights, including accessible summaries of the Victims' Code, as well as information on what is expected of victims and witnesses. A digital service could also reduce the need for frequent direct contact, which some victims may find distressing, by enabling them to access updates at a time of their choosing.

Finally, accessibility must be a central consideration. Any digital service should be available via web-based platforms and not rely solely on mobile applications, to ensure that it does not exclude those without access to smart devices.

Question 3B: What information should not be communicated digitally but instead conveyed through personal communication with victims?

We consider that while routine updates and previously communicated information (such as confirmed dates and timelines) may be appropriate for digital communication, more sensitive or potentially distressing information should be conveyed through personal contact. This is due to the significant risk of retraumatisation and can result in harm and victim disengagement from the process⁵.

This includes, but is not limited to, information about new or amended charges, requests for additional evidence (particularly where this may feel intrusive, such as requests for personal digital material such as social media messages), decisions relating to release, and trial outcomes.

Personal communication allows for appropriate support to be provided and ensures that victims are able to ask questions and receive information in a sensitive and responsive manner.

Question 3C. What other considerations should be integral to the design of any digital victim service?

Data security must be of utmost consideration, given the highly sensitive nature of the information that may be held within a digital victim service.

In addition, digital literacy and user experience are critical. The platform must be intuitive and accessible, recognising that victims may already feel overwhelmed and may not engage with a system that is difficult to navigate. It is also essential that the introduction of a digital service

⁵ Inzunza, M. (2022) 'The significance of victim ideality in interactions between crime victims and police officers', *International Journal of Law, Crime and Justice*, 68, p. 100522. doi:10.1016/j.ijlcrj.2021.100522.





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does not lead to victims being directed towards a single mode of communication. Alternative, non-digital options must remain available and of equal quality, particularly for victims who may have experienced technology-facilitated abuse or who prefer not to engage digitally.

Question 3D: How could a digital victim service help to prepare victims for what to expect at the court?

A digital service could play a valuable role in preparing victims for court by providing clear, accessible information about upcoming hearings and what to expect.

This could include explanatory materials outlining the roles of different individuals within the courtroom (such as the judge, jury, prosecution and defence), as well as video content to help demystify the court process. The service could also provide signposting and direct links to relevant support services, alongside carefully selected updates (see question 3B) and frequently asked questions tailored to the victim's circumstances.

Consideration could also be given to including information on how victims can raise concerns or make complaints.

Question 3E: Please provide your views on what agencies could do to make sure that communication with adult victims is undertaken in a quality and trauma-informed way. Please see question 2F for child victims specifically.

Ensuring that communication with adult victims is trauma-informed requires a consistent, system-wide approach grounded in training, practice and organisational culture. All staff engaging with victims should receive comprehensive and ongoing training in trauma-informed principles, including an understanding of how trauma can affect memory, communication, behaviour and engagement with services. This should be supported by clear guidance on how to communicate sensitively, avoid re-traumatisation, and respond appropriately to a range of emotional and practical needs.

In addition to training, agencies should embed trauma-informed practice within organisational processes and supervision structures. This includes allowing sufficient time for meaningful engagement, minimising unnecessary repetition of information, and ensuring that victims are kept informed in a clear, timely and respectful way. Quality assurance mechanisms, such as supervision, case reviews and feedback from victims, are also essential to ensure that standards are consistently applied in practice rather than remaining aspirational.

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Partnership working with specialist organisations is a key component of effective trauma-informed communication. Organisations such as Victim Support, Women's Aid (all federations), and SafeLives bring significant expertise in supporting victims and can provide both direct support and guidance to statutory agencies. Strong, well-resourced partnerships can help ensure that communication is not only procedurally correct, but genuinely responsive to victims' needs and experiences.

Question 3F: What role can the Code have in supporting quality and trauma-informed communication processes?

The Code has a critical role in establishing clear, consistent standards for communication with victims, including the expectation that all engagement is trauma-informed, respectful and responsive to individual needs.

In addition to setting out principles, the Code can play an important role in promoting greater consistency in practice across agencies. Research on victim–police interactions highlights that victims are not always treated equally, with responses influenced by perceptions of the “ideal victim.” Victims who are perceived as more credible, vulnerable or compliant may receive more empathetic and supportive responses, while others -particularly those who do not fit these expectations -may experience less effective engagement⁶.

This variation risks reinforcing inequalities and undermining trust in the criminal justice system. The Code should therefore emphasise that all victims are entitled to the same standard of communication and support, regardless of background, circumstances or perceived credibility. To support this, the Code should set out clear expectations for communication processes, alongside guidance that reduces the scope for discretionary variation in how victims are treated. This includes reinforcing the importance of procedural fairness, consistency, and accountability across agencies.

However, standardisation must be balanced with flexibility. While consistent minimum standards are essential, communication should still be tailored to individual needs and preferences to ensure that it remains genuinely trauma-informed.

⁶ Inzunza, M. (2022) 'The significance of victim ideality in interactions between crime victims and police officers', *International Journal of Law, Crime and Justice*, 68, p. 100522. doi:10.1016/j.ijlcrj.2021.100522.



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Question 3G: Do you think agencies should be able to delegate certain responsibilities such as providing information to victims and making referrals to support services?

We agree that agencies may delegate certain responsibilities, such as providing information or making referrals, where appropriate.

However, this must be underpinned by robust, stable and well-managed partnerships. Frequent changes in service provision or unclear responsibilities risk creating confusion and inconsistency, which can be detrimental to victims' experiences. It is also essential to recognise the capacity constraints faced by many specialist services. Any delegation of responsibilities must be accompanied by sufficient resourcing to ensure that services are able to deliver effectively.

Questions 4A to 4L

Question 4A: Do you think that the opportunity to make a Victim Impact Statement should be offered to victims once a suspect has been charged and again when a trial is scheduled?

We support offering victims the opportunity to make a Victim Impact Statement at multiple stages. However, it is essential that this is clearly communicated as optional. Victims may feel implicit pressure to complete a statement, particularly where they believe it may influence sentencing outcomes. The process of drafting and delivering a statement can also be emotionally challenging and, for some, retraumatising.

A trauma-informed approach requires that victims are supported to make an informed choice without pressure, and that they are given flexibility in both timing and format should they choose to proceed.

Question 4B: How helpful do you think the new information in Right 7 is to ensure victims understand how they can make a Victim Impact Statement?

We consider the information in Right 7 to be somewhat helpful in clarifying what a Victim Impact Statement is and when it can be made, but as stated in question 4A, improved written information alone is unlikely to address underlying issues relating to awareness, confidence and perceived pressure. Victims may still feel an expectation to complete a statement, particularly where the purpose and impact are not fully understood

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We also welcome the inclusion of information on Community Impact Statements, which provide an important mechanism for reflecting the experiences of multiple victims. Ensuring this is clearly communicated in practice will be key to improving uptake and understanding.

Another key point remains of victim impact statements being communicated and offered properly, with only 13%⁷ of victims surveyed in the CSEW recalling receiving an offer to make one.

Question 4C: How helpful do you think the new information in Right 11 is to ensure victims understand when they can make a Victim Impact Statement?

We consider this information to be helpful, particularly in clarifying victims' rights in relation to parole and Mental Health Tribunal processes.

Providing clearer guidance on when victims can engage at these stages supports greater transparency and helps manage expectations. This is particularly important given the complexity of post-sentencing processes, which can otherwise be difficult for victims to navigate. Continued emphasis on clear and timely communication at these stages will be essential to ensure that the information is meaningful in practice.

Question 4D: At which point(s) during criminal justice proceedings should victims be told about sentencing hearings and offender attendance?

Victims should be informed as early as possible about sentencing hearings and the potential attendance of the offender. These are key milestones within the criminal justice process, and early communication allows victims sufficient time to process the information, seek support, and make informed decisions about their involvement. Where there are changes or uncertainty, this should be communicated clearly and sensitively, with efforts made to minimise last-minute updates wherever possible.

Question 4E: What information would be useful to help victims understand why the judge may or may not decide to order the offender to attend the hearing?

⁷ Windsor, E. and Roberts, J.V. (2020) Victim Personal Statements and Sentencing: A review of policy, operation and research. London: Sentencing Academy. Available at: <https://www.sentencingacademy.org.uk/wp-content/uploads/2023/09/Victim-Personal-Statements-and-Sentencing-2-2.pdf> (Accessed: 21 April 2026).





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Clear, timely and transparent communication is essential to help victims understand decisions regarding offender attendance.

Where possible, victims should be informed in advance and provided with definitive information, recognising that uncertainty can be particularly distressing. Where decisions are subject to change, this should be clearly explained, alongside the reasons for this. Victims should also be informed about any potential risks, including the possibility of disruptive or distressing behaviour, and reassured that their safety and wellbeing are being prioritised. In cases involving abuse, particular consideration must be given to the potential for ongoing harm within the courtroom environment.

**Question 4F: Do you think that sentencing decisions are well understood by victims?
[Yes/No] Please explain your answer.**

No, we do not consider that sentencing decisions are well understood by victims. Evidence indicates that a significant proportion of victims report that convictions and sentences are not adequately explained to them, with a fifth⁸ of victims reporting that the conviction and sentence were not properly explained to them, highlighting a gap between legal processes and victim understanding. This can contribute to confusion, dissatisfaction and a reduced sense of justice. Improving how sentencing decisions are communicated, particularly through clear, accessible explanations, should be a priority.

Question 4G: What materials do you think would be useful for victims to help increase their understanding of sentencing decisions?

We recommend the development of clear, accessible educational materials that explain sentencing decisions in plain language in order for victims to understand and therefore recover from the criminal justice process.

Given the complexity of legal frameworks, materials should aim to break down key concepts, including how sentences are determined and what different outcomes mean in practice. A range of formats should be used, including written guides, short explanatory videos and digital content. Digital materials might be useful here, such as a web page designed to convey this

⁸ <https://victimscommissioner.org.uk/news/fewer-than-half-of-victims-believe-they-can-get-justice-finds-victims-commissioner/>





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information. Tailoring materials to different offence types or scenarios may also support greater understanding and relevance for victims.

Question 4H: Do you agree that victims should be proactively offered additional opportunities to join the Victim Contact Scheme, where eligible?

We support proactively offering victims additional opportunities to join the Victim Contact Scheme, unless they have clearly indicated that they do not wish to receive further contact. Victims' needs and preferences may change over time, particularly as an offender progresses through their sentence or approaches potential release. Providing further opportunities to opt in allows victims to make decisions that reflect their current circumstances. Any further contact should be made sensitively and in a way that respects the victim's previous decisions.

Question 4I: At what point(s) do you think this offer could be made to victims (outside of the circumstances accounted for where risk has increased to the victim, or where the case is high profile)?

Any further offers should be made at appropriate and proportionate intervals, such as at key points in an offender's sentence, including when they are approaching eligibility for release. However, this should be balanced with respect for the victim's wishes. Where a victim has clearly and definitively declined, this preference should be respected unless there is a significant change in risk. A flexible, case-by-case approach will be important to ensure that contact remains appropriate and proportionate.

Question 4J: Do you agree that the victim should have to consent to being contacted in future if they decline joining the Scheme (outside of the circumstances accounted for where risk has increased to the victim, or where the case is high profile)?

We agree that victims should provide consent to being contacted in future if they decline to join the Scheme. Respecting victims' autonomy and choices is essential to a trauma-informed approach. Unsolicited contact may risk causing distress or undermining trust in services. However, we recognise that there may be exceptional circumstances where contact is necessary due to increased risk, and these should be clearly defined and communicated.

Question 4K: Do you think that a way for victims to express their views about an offender's release should be introduced, recognising that this cannot have an impact on the Parole Board's release decision?

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We do not support introducing a mechanism for victims to express views where these cannot influence the outcome of the decision. While it is important that victims feel heard, offering a process that has no material impact risks creating false expectations and may be experienced as tokenistic. This may ultimately undermine trust in the system rather than enhance it. Any mechanism for victim engagement should be meaningful and clearly linked to decision-making processes.

Question 4L: Please provide your views on how you think victims could express their views about an offender's release where it is decided by the Parole Board.

In line with our response to question 4K, any mechanism for victims to express their views should be meaningful and transparent in its purpose. Where victim input cannot influence the outcome, care must be taken to avoid creating false expectations or placing additional emotional burden on victims. Engagement should be proportionate and clearly explained. Consideration should instead be given to strengthening existing processes where victim input does have a defined role, ensuring these are accessible and well-communicated.

Questions 5A to 5G

Question 5A: What do you think about requiring that victims be told about the Code when they report the crime, and when they have their needs (re) assessed?

We support the requirement for victims to be informed about the Victims' Code both at the point of reporting and when their needs are reassessed.

However, it is important to recognise that awareness of the Code should not begin only once an individual becomes a victim. The effectiveness of the Code is fundamentally dependent on wider public awareness of rights prior to engagement with the criminal justice process. Without this, individuals may not recognise when their rights are not being upheld or feel confident in challenging poor practice.

We also recognise that the point of reporting is often a time of significant distress, during which victims may not be able to fully absorb or retain detailed information. As such, reiterating information about the Code at later stages, particularly when needs are reassessed, is essential. This repetition should be framed as part of a consistent, ongoing communication approach

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rather than a one-off provision of information. Research⁹ on victimisation consistently highlights low awareness of procedural rights, with studies in victimology and procedural justice literature indicating that many victims have limited understanding of their entitlements unless information is repeatedly reinforced over time.

Consideration should also be given to how this information is communicated, ensuring that it is delivered in a clear, accessible and trauma-informed manner, and tailored where possible to individual needs.

Question 5B: What do you think about the new requirement for police to offer victims a standard physical or digital product on the Code?

We support the introduction of a standardised physical or digital product as a means of improving consistency in how victims are informed of their rights. This has the potential to reduce variation in practice across police forces and to strengthen accountability where standards are not met.

However, it is important that the design and delivery of such materials take into account the context in which they are provided. Victims may be experiencing distress, shock or confusion, and there is a risk that lengthy or overly complex materials may not be engaged with. Concise, clearly structured and accessible formats are therefore essential to ensure that information is usable in practice.

At the same time, standardisation should not come at the expense of flexibility. Victims should be able to access information in a format that best meets their needs, including verbal explanations where appropriate, and materials should be adaptable to different communication needs, including language, accessibility and literacy considerations. Research on digital justice highlights both opportunities and risks in digital service delivery, including improved accessibility for some users but potential exclusion for those with limited digital access or literacy¹⁰.

We also encourage consideration of wider dissemination strategies. For example, incorporating information about the Victims' Code into broader public-facing communications, such as local authority correspondence or community information campaigns, could help to improve baseline

⁹ Laxminarayan, M. et al. (2013) 'Victim satisfaction with criminal justice: A systematic review', *Victims & Offenders*, 8(2), pp. 119–147. doi:10.1080/15564886.2012.763198.

¹⁰ Goldsmith, S. and Crawford, S.P. (2014) *The responsive city: Engaging communities through data-smart governance*. San Francisco, CA: Jossey-Bass.



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awareness and ensure that individuals are better informed before entering the criminal justice process.

Question 5C: Do you think the proposed materials would help to improve victims' awareness of the Code?

We consider that the proposed materials are likely to contribute positively to improving awareness of the Code.

However, there is a risk that materials present victims' rights in isolation, without sufficient context as to how those rights operate in practice. This may limit their usefulness, particularly for individuals who are unfamiliar with the criminal justice process. To maximise impact, materials should aim not only to outline rights but also to demonstrate how they apply at different stages of the process. This could include practical examples, scenarios, or clear explanations of what victims can expect in real terms.

It is also important that materials reflect the diversity of victims' experiences, ensuring that individuals are able to see their circumstances represented and understood. This can support greater engagement and trust in the system.

Question 5D: What materials do you think would help children engage with the Code (for example, a video)?

We support the use of a range of engaging and accessible formats, including video content, to support children's understanding of the Code.

Materials should be tailored to different age groups and developmental stages, recognising that a single approach is unlikely to meet the needs of all children and young people. For example, younger children may benefit from more visual and simplified content, while older children and adolescents may require more detailed and context-specific information.

Interactive resources are particularly valuable in supporting engagement and understanding. For example, the interactive courtroom tool developed by Victim Support (<https://www.victimsupport.org.uk/you-co/interactive-courtroom/>) provides a practical and accessible way of familiarising young people with the court environment.

Additional approaches, such as quizzes, games or scenario-based learning tools, may further enhance engagement. We also note that these types of resources may have broader

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applicability and could be beneficial for adult victims who may similarly benefit from more accessible and interactive formats.

Question 5E: What information about the criminal justice process could we include to support children to understand the Code?

Information for children should be clear, accessible and age-appropriate, with careful consideration given to both content and presentation.

Key areas should include explanations of police processes, investigation stages, court proceedings and possible outcomes. It is also important to clearly outline what support is available, both during and after engagement with the criminal justice system, and how this support can be accessed.

In addition, materials should emphasise children's rights in a practical and meaningful way, helping them to understand not only what their rights are, but how they apply in real situations and what they can expect from different agencies.

Consideration should also be given to the role of families and carers, ensuring that information is accessible to those supporting the child. At the same time, older children and young people should be able to access information independently, supporting their autonomy and understanding.

Question 5F: Where could this information for children be held (for example, on www.gov.uk)?

At a minimum, this information should be available on official government platforms such as gov.uk, as well as on police websites, to ensure credibility and consistency.

However, accessibility and reach can be significantly enhanced by distributing information through trusted, child-focused organisations. This includes platforms operated by organisations such as Childline, NSPCC, and Barnardo's, which are already widely recognised and accessed by children and young people.

In addition, community-based settings - including schools, youth services, and other local environments - play an important role in increasing awareness. Embedding information within these settings can help ensure that it is accessible to those who may not actively seek it out online.

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Question 5G: What digital tools and innovation could help increase accessibility of the Code for children?

Interactive digital tools are likely to play a key role in increasing accessibility for children and young people.

As noted above in our response to question 5D, interactive online resources, such as those developed by Victim Support, can support understanding in a way that is engaging, accessible and less intimidating than traditional formats.

In addition, the use of multimedia content, including short videos, animations and scenario-based learning tools, can help to explain complex processes in a more digestible way. Targeted use of digital platforms, including age-appropriate social media content, may also support engagement with older children and young people. However, this should be approached carefully, with appropriate safeguarding and consideration of privacy.

Questions 6A to 7

Question 6A: Please provide any views relating to this additional information in the Code.

We have no further feedback to add.

Question 6B: Are there any further views you would like to share as part of this consultation which haven't been captured via responses to other questions?

We would like to state the pressure that victims can face to undertake or refrain from certain actions, in order to appear more credible or convincing to a jury, which is especially pertinent in cases concerning abuse or sexual offences. This is particularly relevant to Right 4, where victims have often been advised to avoid seeking counselling while police investigations were ongoing due to their therapy notes being used to decide whether to proceed with a prosecution¹¹. We hope this will be reflected upon and victims will have their rights fully upheld.

Question 7: Have we correctly identified the range and extent of the equalities impacts under this consultation in the Equality Statement? Please give reasons and supply evidence of further equalities impacts that are not covered as appropriate.

¹¹ <https://www.gov.uk/government/news/new-rules-on-police-requesting-counselling-notes-come-into-force--2>





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We would like to reiterate our concerns around supporting those who require translators or interpreters to make sure Right 1 is being adhered to, as there are concerns about sufficient effort to secure independent and appropriate interpreters where safety risks may exist.

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