

Ministry of Justice, A new Victims' Code: consultation document Catch22 response 30/04/2026

Question 1B: Do needs assessments occur at the right stages of the criminal justice process? **[NO]**

Catch22 is a social business operating five victim support services across England, including the Young Londoners' Victim Service (ages 4-17), which supported 16,257 victims of crime in 2025. We also support victims of county lines, criminal exploitation, and sexual exploitation through our specialist services. This extensive operational experience and expertise underpins the views we set out in this response.

We are pleased to see that the new draft code moves needs assessments to Right 1 and introduces three specific trigger points. We broadly support this, but our frontline experience highlights significant gaps in how assessments are completed in practice and what happens to the findings afterwards.

These three proposed stages cover important transition points. However, we would urge that the code go further, and that two additional stages are added: the conclusion of a case, and the release of an offender.

The end of a case – whether through acquittal, conviction, or discontinuation – can be deeply disorienting for victims regardless of the outcome. A needs assessment at the conclusion of a case would provide a structured opportunity to check in with victims, ensure they have the support they need to process the outcome, and make referrals where appropriate.

Moreover, for many victims, offender release is one of the most anxiety-inducing moments of the entire process – yet it can occur months or years after the case has concluded, by which point contact with support services may have ended entirely. A needs assessment at or before the point of release would ensure that victims are not left to navigate this moment alone, and that any new safeguarding concerns are identified and acted upon promptly. This also applies to child victims, who may also find the prospect of release distressing.

RECOMMENDATION 1: Add case conclusion and offender release as formal trigger points for needs assessments, alongside the three stages already proposed.

We argue that the Code should be clearer about how information gathered at each stage is used, updated and carried forward. Repeating the entire needs assessment could cause unnecessary distress: having to re-tell their story can feel dismissive and retraumatising for victims, particularly if it suggests their previous answers have not been read or retained.

This matters even more in light of proposals to share needs assessment data between agencies. The Code should be explicit that information sharing is not just permitted but expected, so victims engaging with multiple services are not forced to start from

scratch each time. Any such information sharing should first receive the victim's informed consent, with robust data sharing protocols in place.

The Code should clearly distinguish between information that only needs to be collected once (such as the nature of the crime) and information that should be revisited as circumstances change (such as contact preferences, living arrangements, or willingness to receive support).

RECOMMENDATION 2: Distinguish between needs assessment questions that should be asked once only and those requiring regular review, and require that findings are proactively shared with all services working with that victim with the victim's informed consent.

We also strongly recommend that the Code requires victims to be offered multiple, ongoing opportunities to opt into support services – not only at the point of first police contact. Our services regularly receive referrals from victims who were not ready to engage when they first reported, but who later sought support independently. A victim's readiness to receive help is not fixed at the moment of reporting, and the Code should explicitly reflect this reality.

Question 1C: Do needs assessments cover the right information to inform necessary adjustments to services? [NO]

We welcome the draft Code's focus on communication needs, interpretation, and special measures. However, our services consistently identify gaps in what assessments capture. They should also include:

- **Digital literacy and preferred communication method** – as criminal justice agencies move towards digital portals and online services for case updates and information, needs assessments need to also be actively establishing whether victims have the practical capacity to engage with digital services (e.g. due to smartphone access, internet access, confidence, age, disability, etc.).
- **Safe contact details** – the current code already requires officers to record a victim's preferred and safest method of contact. However, our data shows this is one of the most consistently unmet requirements in practice. Across the Catch22 Norfolk and Suffolk victim services, 33.6% of invalid referrals were flagged as not safe to contact, and 19.2% had no contact details. At our Young Londoners Victim Service, 75.2% of invalid referrals were missing key information that prevented safe contact, meaning that 20% of referrals were closed due to missing key information. It is crucial that any needs assessment determines the times and methods by which it is safe to reach a victim, and whether the perpetrator may have access to their phone, email, or home address. In domestic abuse and stalking cases, failure to record and pass on safe contact information is a safeguarding risk, not an administrative gap.
- **Housing stability**, which the Code's current treatment of "practical concerns" does not adequately address. For victims of domestic abuse or exploitation in

particular, unstable/unsafe housing is not just a practical inconvenience, it directly determines whether a victim can safely engage with a service at all.

- **Previous victimisation and contact with the criminal justice system**, which can significantly affect a victim's level of trust, their expectations, needs, their willingness to engage, and their vulnerability to revictimisation.

We want to stress that the value of a needs assessment depends on how its findings are used. Our services regularly receive referrals where assessments are poorly completed or key information is not passed on at all. We see missing or incorrect contact details and, in the most serious cases, the contact number of a perpetrator rather than the victim. Where a victim is at risk of coercive control, this is a direct risk to their safety.

Evidence from our victim services show that about one in four referrals received cannot be acted on safely or at all. This represents a significant waste of finite resource and, more importantly, a direct risk to the victims those referrals represent.

Catch22 service data – referral quality

Young Londoners' Victim Service (since January 2025): of 14,328 referrals received, 24.5% (3,509) were not valid.

- 75.2% of invalid referrals were missing key information that prevented safe contact.
- 23.0% of invalid referrals were duplicates.

Norfolk and Suffolk Victim Services (since October 2025): of 10,917 referrals received via the ADT, 13.4% (1,467) were not valid.

- 33.6% (493) of invalid referrals were not safe to contact.
- 22.7% (333) were out of area.
- 19.2% (281) had no contact details.
- 10.8% (158) were duplicates.
- 10.3% (151) were ineligible.

This creates avoidable pressure on frontline services, as teams spend time chasing basic information instead of supporting victims, and without the right context we cannot properly safeguard at first contact.

While proposals to share needs assessment data between agencies are welcome, the Code should go further by making clear that referring agencies have a duty to pass on relevant information, and that services have a right to receive it – and for data quality to be a measure of accountability of proper implementation of the Code. There should also be a clear way for victim services to flag deficient referrals back, so these failures are identified and addressed.

Best practise example: triage and screening models in Leicestershire and Hertfordshire

Two of Catch22's victim services operate alongside a dedicated police staff triage function that sits between frontline officers and our service. A small team makes proactive contact with each victim, provides their crime reference number, and carries out a brief needs check before any referral is made. This ensures that every referral we receive has been through a real conversation with the victim. Co-location with Catch22 staff allows queries to be resolved quickly, which is particularly valuable in cases with safeguarding concerns. In Hertfordshire this operates across all crime types; in Leicestershire it covers a more limited range. Both demonstrate what effective information-sharing can look like in practice, and we would encourage the Ministry of Justice to consider how local and national commissioning guidance could support wider adoption of similar models.

RECOMMENDATION 3: Set up a formal feedback mechanism through which victim services can flag incomplete or unsafe referrals back to the referring agency, with a duty on that agency to respond, and make data quality an accountability measure.

RECOMMENDATION 4: Include guidance for commissioners for the development of dedicated victim triage and screening teams, ideally co-located with victim services, to improve the quality and safety of referrals.

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? [YES]

A needs assessment at the end of a case should be a requirement, not an optional addition, and offender release should be introduced as a further trigger point alongside it. We address both points in our response to Question 1B, but answer the specific questions here about what such assessments could cover and how the information could be used.

A needs assessment at case conclusion could usefully cover: how the victim is coping with the outcome and whether ongoing support is needed; whether they understand what the outcome means in practice, including sentence length, release dates and licence conditions; whether they wish to join or remain on the Victim Contact Scheme; any ongoing safeguarding concerns; and whether they would like to explore restorative justice (RJ). For many victims, including child victims, the conclusion of a case is the moment at which they are most ready to consider RJ, as the facts have been established and the legal process complete. The new Code proposes that victims be informed about RJ at conviction; a needs assessment at case conclusion would be useful for delivering this in a meaningful, personalised way rather than as a standard notification.

At the point of offender release, a needs assessment could identify any new safeguarding concerns, re-offer the Victim Contact Scheme to

those who previously declined, and again raise restorative justice as an option. For some victims, the prospect of release is a trigger for wanting to understand or find resolution around what happened, and a needs assessment at this point would ensure that opportunity is not missed.

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

The central challenge is not a lack of training but culture: needs assessments are frequently treated as an administrative requirement rather than as a meaningful opportunity to understand the person behind the crime. The most important changes agencies can make are:

- Adopt a conversational, victim-led approach rather than a checklist. In 2025, Catch22's victim services achieved a 96% overall satisfaction rating, and our caseworkers attribute this in part to this approach.
- Mandate trauma-informed training co-designed with victim services and people with lived experience. A 2024 UK study (Quigg et al.) found such training measurably improved officers' empathy and decision-making.
- Use a Single Point of Contact model wherever possible so victims do not have to repeat their story, reducing re-traumatisation for both adults and children.
- Allow adequate time – time pressure is one of the most cited barriers to quality. This is especially important for child victims, who need age-appropriate conversations that cannot be rushed.
- Audit quality using victim feedback, not just compliance metrics - whether a victim felt heard and understood is also an important measure, as well as whether a form was completed.

RECOMMENDATION 5: Require that needs assessment training is co-designed with voluntary sector victim service providers and victims themselves and is subject to regular review.

Question 1F: What role could the Code have in facilitating trauma-informed needs assessments?

The Code already mandates that needs assessments are carried out but does not guarantee quality. The most common failure we see is not that assessments are not attempted, but that they are not completed in enough depth to be useful to the services that go on to work with victims.

We welcome the proposal to develop training for police supervisors through the College of Policing. Beyond training, the Code should require that a superficial or incomplete needs assessment does not meet the standard – initiating one is not the same as completing one. Accountability for this should sit with the police, not be left to victim services to identify and flag after the fact. Forces should be required to

routinely monitor and audit the quality and completion of needs assessments as a core performance measure, rather than just responding when failures are escalated by receiving organisations. This internal quality assurance should sit alongside the external feedback mechanism we recommend in Recommendation 3, so that police review their own practice systematically, and victim services are able to flag failures when they reach them. Together, these measures would begin to close the gap between what the Code requires and what victims actually experience. Without this, failures will continue to be absorbed silently by overstretched voluntary organisations rather than driving systemic improvement.

Trauma-informed needs assessments also depend on strong accountability for Victims' Code compliance. The planned abolition of PCCs raises important questions about how this will work in future, which we address in more detail in our response to Question 7.

Question 2A: Should a framework guiding criminal justice agencies' engagement with children be introduced? [YES]

Yes. Across our services, including the Young Londoners' Victim Service supporting children from age 4 and our child exploitation services, we consistently see children excluded from direct communication about their own cases, and significant inconsistency between forces. Survey data has consistently shown that a significant proportion of children experience crime each year. A national framework setting clear and consistent expectations is long overdue, and must include special consideration for child victims of domestic and extra-familial harm such as sexual and criminal exploitation.

Question 2B: Do you agree with the proposed framework? [NO]

We support the introduction of a structured framework for child victims and child-friendly version of the Code as this should strengthen children's their rights as victims being upheld. However, the intention of the framework cannot be met without a proper investment in the specialist child-focused victim support provision.

While we note the government's intention to address children as a specific category in upcoming Duty to Collaborate as well as the recent funding announcement for therapeutic support for victims of child sexual abuse (CSE) and child sexual exploitation (CSE), there is a dearth of child-appropriate victim support. To ensure that the government can deliver on its commitment to doing better for child victims and the Code, the Ministry of Justice should:

- Further invest in child-specialist victim support to address to address their specific circumstances and needs as well as specific types of crime, such as peer-on-peer violence or online harm. Our learning from our Young Londoners Victims Service indicates that the Code will remain ineffective without this type of child-focused provision being in place locally.

- Create a duty to commission specialist services for child victims of abuse and any type of exploitation, including criminal exploitation, to address the current postcode lottery. This would also have a strong preventative function in re-victimisation.

The updated code currently also lacks clarity about what appropriate child-specific support should look like. To this end it would need further detail on when and how parents/carers, safeguarding agencies, and professionals in the child's life should become involved and what types of information are needed.

Catch22 also has significant concerns about the age categories, as addressed in our response to question 2C.

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? [Yes/No] Please explain your answer.

While we welcome the presumption of direct engagement with 16 and 17-year-olds, we have significant concerns about the proposed age categories.

Our main concern is with the 0-11 category, which does not require agencies to proactively offer direct engagement, and instead places the burden on the child to demonstrate their wish to be involved. It is unlikely that children – particularly younger ones – will proactively assert this. In practice, the risk is that the framework gives agencies justification to reduce direct engagement with younger children rather than improve it.

We also think this category is too broad, not sufficiently reflecting the significant differences in development stages of children.

The framework is inconsistent with the UK's age of criminal responsibility, which is 10. A child of 10 can be arrested, charged and tried in court, yet under this proposal would not be proactively offered direct engagement as a victim. This contradiction is difficult to justify. We recommend the presumption of direct engagement be extended to age 10 at minimum, with an age-appropriate approach required as standard. Through our services, caseworkers regularly work with children from primary school age and demonstrate that complex concepts can be explained in ways children understand and benefit from. The important factor is practitioner skill, not the child's age.

RECOMMENDATION 6: Extend the presumption of direct engagement with child victims to age 10 at minimum, in line with the age of criminal responsibility, with an age-appropriate approach required as standard.

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? [Yes/No] Please explain your answer.

The level of engagement proposed for under-12s, in particular, is insufficient, for two reasons. First, the framework relies too heavily on parents and guardians as the default channel of communication for this age group. In domestic abuse and exploitation cases, which Catch22 encounters regularly, children may be unable to speak freely in front of a carer, or may have been actively instructed not to disclose. Routing all communication through a parent in these or similar circumstances does not protect the child; it can actively prevent disclosure and increase safeguarding risk.

Second, the threshold for direct engagement (requiring that a child act assertively and decide they would like this) is not realistic. Agencies should instead be required to carry out a routine safeguarding assessment before defaulting to parental communication, treating direct engagement with the child as the baseline consideration.

RECOMMENDATION 7: Require agencies to conduct a routine safeguarding assessment before routing all communication through a parent or guardian for under-12s. direct engagement with the child should be the default consideration, not an exception.

Question 2F: What could agencies do to make sure that direct engagement with children is undertaken in a quality and trauma-informed way?

The most important factor in trauma-informed engagement is practitioner skill and training, not the framework itself. Based on our extensive experience in providing trauma-informed support to child victims of crime, abuse, and exploitation, our key recommendations are:

- Employ specialist child-trained practitioners in the same way police designate officers for specific crime types.
- Use age-appropriate language and communication tools. Our caseworkers have demonstrated this is possible across a wide age range, including with children who have SEND. Ensure the child-friendly version of Code also includes age-appropriate language, rather than formal terminology.
- Conduct engagement in child-friendly environments rather than police stations wherever possible.
- Adopt a consent-based approach, always explaining to the child what will happen with their answers.

Children who feel informed and given appropriate agency are more likely to show better engagement and recovery outcomes. Our services demonstrate daily that age-appropriate communication with child victims is transformative, and we believe this should inform the framework.

Question 3A: What information would be most valuable for victims to access on a digital service?

The evidence is clear that poor communication is one of the most damaging aspects of the criminal justice experience for victims. The Victims' Commissioner's latest survey (published 2025) found that only around 40% of victims felt they were kept informed about their case, highlighting ongoing problems with communication. Victims told the survey that more regular updates, without having to chase, would have massively improved their experience. In our services, one of the most consistent findings is that victims feel forgotten, confused, and out of the loop. Many do not know that they are entitled to receive an update from the police every 28 days – a basic entitlement that already exists in the current Code but is widely unknown.

The most valuable digital offer would be a visual, interactive journey map showing where a victim is in the process, what comes next, what their rights are at each stage, and any updates on police activity. Catch22 has an online Victim Resource Hub accessible to the victims we support, and its use shows strong demand for this kind of accessible, self-directed information.

A digital service could usefully provide real-time case status updates; named contact details for the allocated officer or caseworker; relevant Code rights at each stage; available support services; court preparation information; and bail or remand conditions where relevant.

Question 3B: What information should not be communicated digitally?

Some communications must always be delivered personally by a trained professional before any written confirmation is provided. These include: charging decisions (especially not to charge); case discontinuation; trial outcomes and sentencing; offender release; and any development that is sensitive, unexpected, or likely to have significant emotional impact.

This principle applies with particular force in serious cases and with vulnerable victims, including children. A child or a domestic abuse victim finding out a key outcome through a digital portal, before anyone has spoken to them, risks causing serious harm. Digital tools are great to expand the information available to victims, but they should never be the primary vehicle for delivering news that could have a big emotional impact on a victim, or massively impact their life.

RECOMMENDATION 8: Introduce digital case update tools as a supplement to personal contact, not a replacement. non-digital pathways must be proactively offered rather than left to victims to request, particularly for older adults, those with learning disabilities, and children.

RECOMMENDATION 9: Require that sensitive communications – including charging decisions, discontinuation, trial outcomes and sentencing – are always delivered personally by a trained professional before any written or digital confirmation.

Question 3D: How could a digital service help to prepare victims for court?

Court is one of the most daunting parts of the process. Many victims have never been in a courtroom and don't know what to expect. Catch22 currently addresses this through peer support groups for victims experiencing court delays – virtual and in-person sessions where practical information is shared and emotional support is available.

A digital tool could usefully provide plain-English explanations of court processes; who the different people are and what they do; what special measures are available and how to request them; and a glossary of common terms. An accessible FAQ would allow victims to get quick answers without having to contact a professional. Information is currently scattered across multiple sources, often presented in dense documents that are hard to navigate. A single, well-designed platform with a good search function and plain-language content would be a genuine improvement. This should be developed in co-production with victims and built with accessible design from the outset.

Question 3E: What could agencies do to ensure communication with adult victims is trauma-informed?

Good communication ultimately comes down to practitioners genuinely understanding the experience of victimisation, rather than just following a process. The most effective investment is in training that gives frontline professionals real insight into how victims will likely feel at each stage of the criminal justice journey, so that sensitivity becomes instinctive rather than procedural. Multiple Catch22 services have delivered this kind of training to police, ambulance staff and A&E departments.

Structurally, the most important structural change agencies can make is to move towards a Single Point of Contact model – ensuring that victims speak to someone who already knows their story, rather than beginning again with a stranger at every point of contact. Victims consistently tell us that continuity of relationship is one of the most important factors in their experience of the process.

Transparency and realistic expectation-setting are also essential: victims need to be prepared for the possibility of not getting the outcome they hoped for, and this must be handled with empathy and without false reassurance.

RECOMMENDATION 10: Require criminal justice agencies to implement a single point of contact model where possible, so that victims, including children, are not required to repeat their story to multiple professionals throughout the criminal justice process. this should be embedded in the code as a standard to work towards, with agencies required to explain when this has not been possible to achieve.

Question 4A: Should the Victim Impact Statement be offered at charge and again before trial? [YES]

Yes. The Victims' Commissioner's 2024 survey shows that even at the court stage only 60% of victims recall being offered the opportunity to complete a VIS. This indicates low uptake in practice, and so it is important that offer points are written into the code.

Moreover, multiple offer points are particularly important given the length of court delays: the impact of a crime on a victim can change significantly in the months or years between charge and trial, and a single early offer does not capture this.

Despite earlier findings (2023 HMCSI report on domestic abuse cases) that updated Victim Impact Statements were rarely requested at sentencing, a 2025 inspection found this remained an issue, requiring a national recommendation to ensure this happens consistently in domestic abuse cases. The Code should make it clear that victims can update their statement at any point before sentencing, not only at the two formal offer points.

RECOMMENDATION 11: Make explicit in the code that victims can update their victim impact statement at any point before sentencing, with caseworker support available.

Question 4D: At which points should victims be told about sentencing hearings and offender attendance?

Victims should be informed about sentencing hearing and offender attendance as soon as a date is confirmed, again when the sentencing hearing is set, and at least seven working days before with full practical details. From the outset, they should be told that offenders are generally expected to attend court. If it becomes known that the offender may not attend, victims should be informed as early as possible, through personal contact rather than digitally, with a clear explanation.

It is important to prepare victims early for the possibility of non-attendance. For many, the prospect of seeing the offender in court is one of the most anxiety-provoking parts of the process, and last-minute changes can increase distress. Victims should be informed about judges' powers to order attendance, what these mean in practice, and what options exist if attendance is not secured.

These points in the victim's journey are also key moment to remind them of specialist victim support.

We would also urge the Ministry of Justice to provide clarity in the Code on the importance of communicating this in a trauma-informed way and have consideration for what children need especially if the offender is a parent, carer, or someone who was previously trusted by the child.

Question 4E: What information would help victims understand why a judge may or may not order an offender to attend?

Victims would benefit from: a plain-language explanation of the legal powers and the factors a judge considers; clear reassurance that an offender's absence does not diminish the seriousness of the case or the weight given to their statement; and information about what happens procedurally in the offender's absence. This should be delivered by a trained professional, ideally supported by their victim service caseworker, and should be available in accessible formats.

Question 4F: Are sentencing decisions well understood by victims? [NO]

Confusion about sentencing is one of the most consistent findings across our Catch22 services. Victims frequently misunderstand sentence length, release dates, licence conditions, and the difference between custodial and suspended sentences. Jargon ('concurrently', 'on licence') is routinely used without explanation. For example, the assumption that a "life sentence" means someone will never be released is widespread. When victims eventually discover the reality of a sentence, the gap between expectation and outcome erodes confidence in the entire system.

We welcome the Government's decision to make sentencing remarks freely available to victims from January 2026, but sentencing remarks are written for a legal audience. Services should be funded to provide plain-language translations, co-produced with victims, explaining what the sentence means in practice.

The Progression Model, introduced in the Sentencing Act 2026 aims to simplify sentencing by creating a clearer framework for how long offenders will service in custody, which is a welcome step towards greater transparency. However, a clearer framework only helps victims if it is communicated effectively. Our experience is that victims consistently struggle to understand sentencing outcomes. There must be a communications strategy accompanying the Progression Model, designed with victims in mind.

Question 4G: What materials would help victims understand sentencing decisions?

Useful materials would include plain-language guides to common sentence types and their practical meaning; short explanatory videos or infographics on key concepts such as custodial versus suspended sentences, licence periods, and the parole process; accessible FAQ resources; and access to victim service caseworkers who can explain the sentence in context. All materials should be co-produced with victims and available in multiple formats, including easy-read versions, audio, and languages other than English.

Question 4H: Should victims be proactively offered additional opportunities to join the Victim Contact Scheme? [YES]

The current Victim Contact Scheme offer immediately post-sentencing – when many victims are in shock – is consistently poor in timing. Proactive re-offers at key points, including before release consideration, would significantly improve uptake. Victims should also be explicitly told they can change their mind at any point, even if they initially declined.

This aligns with the broader principle throughout our response: readiness to engage is not determined by the stage of the legal process. This applies equally to the VIS, to support services, and to restorative justice.

RECOMMENDATION 12: Require proactive re-offers of the victim contact scheme at multiple points, including before release consideration. victims should be clearly informed they can opt in at any time.

Question 4K: Should victims be able to express views about an offender's release, even if these cannot affect the Parole Board's decision? [YES]

We support giving victims a voice throughout the process. However, if victims invest time and emotional energy in sharing their views and are then told this will have no impact on the outcome, the process risks leaving them feeling less heard. Therefore, it must be made clear from the outset that it is purely an opportunity to share rather than to influence. We would also note that for many victims, the most meaningful and productive way to have their voice heard is through restorative justice, which we address in our answer to question 7.

Question 5C: Would the proposed materials help improve victims' awareness of the Code?

The proposed materials to improve victims' awareness of the Code are a helpful starting point but not sufficient on their own. A QR code card or a leaflet given to a victim at the point of reporting – when they are often in shock – are unlikely to be retained or acted upon. Code awareness must be embedded into victims' interactions with the system at multiple points, rather than delivered once at a stressful moment. It also requires sustained public awareness activity and active promotion through community settings such as GP surgeries, schools, libraries, and A&E departments, where victims may seek help before or instead of contacting police. It is also important to measure whether efforts are working, and to revise the approach if awareness does not improve.

RECOMMENDATION 13: The government should require agencies to monitor victims' code awareness as a core outcome metric and be prepared to revise its approach if awareness does not improve.

The materials also need to account for different needs – a QR code is inaccessible to victims who lack digital literacy, a smartphone, or confidence online, including many older adults and some of the most vulnerable people our services support. For children, co-produced digital tools (e.g. interactive journey maps, age-appropriate videos, and partnerships with platforms already used by young people) could make the Code genuinely accessible in ways that printed materials cannot. But for all groups, person-centred delivery by trained professionals who take time to explain what the Code means remains the most effective approach.

Multiple Catch22 services have delivered training to police, ambulance staff, and hospital emergency departments on victims' experiences and what good communication looks like. Putting lived experience and frontline knowledge at the centre of how professionals are trained would be one of the most impactful investments the Government can make in Code awareness.

Question 5E: What information about the criminal justice process could be included to help children understand the Code?

Children need information presented in a way that reflects their developmental stage, not simply a simplified version of adult materials. Specifically, they need:

- A simple, visual explanation of the key stages in a case – reporting, investigation, charging, court, outcome – using language they can understand.
- An explanation of who the different people are and what they do.
- Clear information about special measures that are automatically available to them.
- An explanation of what a Victim Impact Statement is and how a parent or trusted adult can help them make one.
- Clear information about how to access support. Reassurance that it is okay to feel scared, confused or upset, and that they can change their mind about engagement at any stage.
- Information about what happens if they disclose at school or through another trusted adult.

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

Digital tools have real potential to make the Code more accessible for children, provided they are co-designed with young people and accompanied by appropriate support. Options might include:

- An interactive ‘journey map’ app showing a child where they are in the process, what comes next, and what support is available at each stage.
- Animated video series explaining key stages and concepts, produced in partnership with young people.
- Gamified learning modules along the lines of BBC Bitesize – accessible, engaging, and familiar in format.
- Voice-activated tools for children who find reading difficult or who have relevant disabilities.
- Partnerships with existing platforms, for example our partner Kooth, to embed Code information within trusted mental health and wellbeing services already used by young people.

- Resources for ‘trusted adults’, including teachers, social workers and youth workers, who play a crucial role in helping children understand and navigate the system. Our YLVS partners with London Youth, who deliver the Trusted Youth Allies (TYA) programme. This includes a training curriculum and range of resources for community champions across London, demonstrating this approach in practice.
- Peer support groups, both in person and virtual, for children waiting for court or going through the process. These combine practical information with emotional support and reflect how children prefer to learn and process difficult experiences.

All of these tools should be co-produced with children and young people, and developed alongside organisations with specialist expertise in child-friendly communication. Digital tools should be understood as one strand of a broader strategy, not a substitute for the human relationships and professional support that child victims most need.

RECOMMENDATION 14: Digital tools to improve children’s access to the code (e.g. interactive journey maps, animated video content) should be co-designed with young people and organisations with specialist expertise in child-friendly communication.

Question 7 – Are there any other views you would like to share as part of this consultation which haven’t been captured via responses to other questions?

We would like the opportunity to share further concerns about the impact of police reform for Victims’ Code implementation, Code adherence accountability, and restorative justice.

Abolition of PCCs

The Police White Paper sets out wide ranging reforms which, if implemented well, might offer much-needed strengthening of integrated strategies, collaborative approaches, and better outcomes for victims. We would, however, urge the Ministry of Justice, together with the Home Office, to consider how the proposed three-tiered policing structure may impact the referral, needs assessment, and communication with victims and adherence to the Code. Consistency and locally-based support are both crucial, no matter the type of crime or police force involved. Moreover, the proposed policing structures and changes needed following the abolition of Police and Crime Commissioners pose significant challenges in ensuring consistency and continuity of multi-crime and specialist victims support provision, which would need to be considered and addressed.

Accountability for Code compliance

The current accountability model for the Victims’ Code has not delivered meaningful compliance in practice. PCCs have a statutory duty to keep compliance under review,

but this does not carry any enforcement powers or consequences for non-compliance. The voluntary sector organisations that see the consequences of Code failures most directly – through deficient referrals, poor information sharing, and victims who have not received their entitlements – do not have formal routes to escalate these failures. Our referral quality data, set out in our response to Question 1C, illustrates the scale of this problem. This accountability must sit with the police forces themselves: police forces should be required to routinely audit the quality and completion of needs assessments internally, rather than relying on voluntary organisations to highlight these down the line. The new governance model should be held to a higher standard than the current model.

The replacement of PCCs with regional mayors or Policing and Crime Boards does not on its own address this. The Government must use this transition as an opportunity to build a genuinely stronger accountability model rather than replicate a failing one. This means setting out clearly how the Code compliance duty will transfer to successor bodies and what enforcement powers those bodies will have.

RECOMMENDATION 15: The government should introduce consequences for non-compliance for those responsible for enforcing the Code and make clear how compliance with the victims' code will transfer from PCCs to new bodies.

RECOMMENDATION 16: The government must ensure that victim services – including pathway referrals – remain consistent during the move to the new policing governance model.

On Restorative Justice (RJ)

The current Code provides a right to information about Restorative Justice (RJ) under Right 3 (at reporting) and Right 4 (referral). The new draft adds a further notification at conviction under Right 9. We welcome this, but it does not address the failures that have prevented the existing entitlement from being delivered. According to the Crime Survey for England and Wales, just 5.5% of victims recall being told about RJ in 2019/20 (the most recent year this data is available) – despite it being in the code since 2015.

Three changes are needed to make the RJ entitlement real. First, RJ information should be embedded into needs assessments throughout the process, including at case conclusion and at the point of offender release, where a victim's readiness to consider RJ may be very different from at reporting or conviction. Second, the conditional language that currently allows gatekeeping must be removed: the Code says police will inform victims about RJ 'where applicable', which in practice means many victims are never told about it. Third, where information is provided, it should be delivered by or alongside trained RJ practitioners, who are best placed to explain the process and answer questions in a way that enables a genuinely informed choice.

RECOMMENDATION 16: Embed restorative justice information into needs assessments throughout the process, including at case conclusion and offender release. remove conditional language from the code that enables gatekeeping and require that rj information is provided by or alongside trained practitioners.

Contact information

We would welcome the opportunity to discuss any of the issues raised in this response with the Ministry of Justice. For further information, please contact Beth Guard, Policy and Communications Manager for Justice and Education at Catch22: bethan.guard@catch-22.org.uk and policy@catch-22.org.uk

