

An International Comparison of Victim Support Services

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Main findings

- Despite legislation across different countries providing similar rights to victims of crime, England and Wales are the only jurisdictions to explicitly recognise that an individual's status and rights as a victim are not dependent on whether the crime has been reported.
- There remains a gap between the availability and uptake of victim support, with many victims not accessing services even where established provision exists. Underreporting and limited trust in the justice system can further restrict access.
- Strong links between victim services and the police improve reach and engagement, particularly through direct referrals, while a single point of contact can reduce re-traumatisation by limiting the need for victims to repeatedly recount their experiences. However, greater service reach can create significant capacity pressures, as proactive referrals increase caseworker workloads at a time when many victim services face funding constraints.
- Even within countries with relatively developed victim-support systems, victim support remains geographically inconsistent. Across the UK and other countries examined, services are often delivered by different organisations rather than through a single national provider, resulting in variations in the type and availability of support depending on where victims live. Consistency of provision therefore emerges as a key consideration for effective victim support, highlighting the need to balance locally commissioned and specialised services with ensuring that all victims can access comparable standards of support regardless of location.

Introduction

Formal victim services were implemented internationally in the 1970s (Sims et al., 2005) and have been an area of growing interest ever since. Victim services are complex to measure and research due to a lack of standardisation of outcomes. Unlike with prison leavers, where the main outcome measure is re-offending, for victims there is not necessarily a black and white parameter that can be measured to demonstrate that one has been “unvictimsed”. Victim services vary from country to country due to differing systems adopted by individual governments and organisations, however a lot of similarities can also be identified.

Catch22 is a third sector organisation that supports victims of crime, reported or unreported, in six UK regions: Hertfordshire, Leicestershire, Greater London, Norfolk, Suffolk and Greater Manchester. This review is going to explore how victim services in England compare to victim services internationally. The review will firstly define what a victim is and what their rights are, and how this differs internationally.

It will then explore differing definitions of “victimisation” before comparing and contrasting victim services in Catch22 and in other countries, to identify whether there are any key learnings from other countries that could be adopted.

Victim's rights

There are many different definitions of victims. Christie's (1986) definition, which states that a victim is "someone who is weak, who was engaged in respectable activity at the time of the crime, is beyond reproach and with a perpetrator who was dominant over the victim and had no relation to them".

This is a highly inaccurate definition, as victimhood is not defined by one's strength, personal history, or relationship with the offender. The modern-day definition of victim, as defined in the Collins English dictionary at time of writing, is "someone who has suffered as a result of someone else's actions or beliefs, or as a result of unpleasant circumstances."

The importance of the modern definition is that the onus is completely removed from the victim, and no conditions are attached to the occurrence of the crime, only that someone was harmed after.

Rights can be supplemented by definitions and are determined by governmental legislation. They also have the possibility of changing regularly.

As we will explore below, different countries offer different rights to victims of crime.

United Nations (UN)

In August 2025, the UN defined victims as "persons who, individually or collectively, have suffered harm, including physical or mental injury, emotional suffering, economic loss or substantial impairment of their fundamental rights, through acts or omissions that are in violation of criminal laws operative within Member States, including those laws proscribing criminal abuse of power" (United Nations Office of the High Commissioner for Human Rights, 2025).

This definition is global, but legislation can still differ between countries.

It has been highlighted by the UN that victims need to be treated fairly, which is reflected within the 'Declaration of Basic Principles of Justice for victims of crime and abuse of power'. This outlines that victims globally should have access to restitution, compensation and assistance, including receiving medical, psychological and social assistance (ibid.).

United Kingdom

Most countries use a similar definition to the UN, but have their own individual legislation. In England and Wales, this is reflected in the 'The Code of Practice for Victims of Crime', which came into effect in 2004 and was most recently updated in 2025 (Ministry of Justice, 2025). Victims are defined as 'a person who has suffered harm, including physical, mental or emotional harm or economic loss which was directly caused by a criminal offence' or a 'close relative (or a nominated family spokesperson) of a person whose death was directly caused by a criminal offence.' (Ministry of Justice, 2005).

Victims are entitled to different rights, depending on whether their crime has been reported or not. Under the Code of Practice, all victims are entitled to Rights 1, 4 and 12, as listed below, while victims of a reported crime are entitled to all 12 rights.

1. Be understood and be able to understand.
2. To have the details of the crime recorded without unjustified delay.
3. To be provided with information when reporting the crime.
4. To be referred to services that support victims and have services and support tailored to your needs.
5. Be provided with compensation information.
6. Be provided with information about investigation and prosecution.
7. Make a victim personal statement.
8. Be given information about the trial, process and their role as a witness.



9. Be given information about the outcome of the case and appeals.
10. Be paid expenses and have property returned.
11. Be given information about the offender after a conviction.
12. Make a complaint about their rights not being met.

This highlights that all victims within the UK are entitled to victim services, regardless of whether the crime has been reported or not. This right also extends to victims' relatives, which is not included within the UN definition. Moreover, if someone is a victim of a serious sexual or violent offence where the offender has been sentenced to over 12 months (or detained under the Mental Health Act 1983) they can be put on the victim contact scheme.

This means that they are entitled to a Victim Liaison Officer who can inform them about details of the case and answer general questions about the criminal justice system. Victim Liaison Officers can tell victims whether the offender is being considered for release and the month in which the offender is expected to be released.

The EU

Much of what is contained within 'The Code of Practice for Victims of Crime' (2004) is also reflected in the 'Victims rights directive', which was created for members of the EU. It was initially created in 2012, most recently revised in 2019, with a further proposed revision in 2023. It was mandatory for EU countries (except Denmark, who opted out to maintain national sovereignty) to implement this by November 2015.

The Victims' Rights Directive has more specific additions than the Code of practice for Victims of Crime. For example, the Directive 2024/1712 denotes specifically that victims of trafficking should receive financial compensation from their respective country (Nicodemi & Cirillo, 2024). Moreover, since the 2015 France terror attacks, there has been increased attention towards supporting victims of terrorism within Europe, and an overall increase in legislation for each specific crime one can experience, to make the Victims' Code more comprehensive and applicable to all victims.

Canada

In Canada, a victim is defined as “*an individual who has suffered physical or emotional harm, property damage or economic loss as the result of the commission or alleged commission of an offence*” (Office of the Federal Ombudsman for Victims of Crime, n.d.). In 2015, the Canadian Victims Bill of Rights came into effect, which outlines four main rights:

1. The right to information

Similar to other countries, victims have the right to know about court proceedings, the support available to them, and how to make a complaint if their needs are not being met.

2. The Right to Protection

Victims have the right to as much privacy and security as they want. This can be through not having their identity revealed to the public or having a testimonial aid at court appearances. Throughout the perpetrator's sentence, victims also have the right to know about these changes so they can ask for additional protection.

3. The right to participation

Victims have the right to present an impact statement in court in a variety of mediums. Victims can also have meaningful participation in the parole or conditional release of the offender, such as waiving information about the person being released.

4. The right to seek restitution

Victims have the right to request recompense from the courts for any financial losses acquired from the offence or aftermath of said offence. This may include restitution for physical or psychological harm, damaged property, or cost of temporary housing.

Australia

Australia uses the same definition of victimhood as the EU and Canada, abiding by the ‘Victims of Crime Act 2001’. Victims’ rights will vary based on territory, but all follow a similar framework to that of Canada and the EU. Key rights include being treated with dignity and respect, remaining informed about the case, having access to support services and protection, as well as the ability to complain or seek financial assistance (Australian Government, n.d).

Comparison of definition and rights

Most of these definitions are very similar and they provide very similar rights throughout the respective country's legislation. The focus across all of the above countries is the right to protection, participation, restitution and remaining informed, as nicely encapsulated by Canada's Victim Bill of Rights.

A remarkable difference, however, is that England and Wales are the only countries to have reference to unreported crimes and victims' rights within their legislation. Although this does not mean that victims of unreported crimes in other countries cannot access victim services (as will be explored below), legislation in England & Wales explicitly recognises that a person's status as a victim is not dependent on whether the crime has been reported.

The International Crime Victims survey (ICVS)

The ICVS was created in 1987 by European researchers to compare estimates of victimisation across countries (Kesteren, Dijk, and Mayhew, 2014). The ICVS looked at overall statistics related to crimes internationally, as well as getting feedback from victims themselves on questions such as whether they reported their crime to the police, whether they were satisfied with the treatment they received from the police or whether they received support. The survey has been distributed five times: 1987, 1992, 1996, 2000 and 2004/5. By the end of 2005, 78 countries had participated.

The ICVS has been fundamental in understanding victimology across the globe. The various surveys firstly have identified that victimisation rates have high variability across different countries. In developed nations, there is a higher rate of property crimes such as burglary or car theft. In less developed countries, there is a higher rate of violent crimes such as assault and robbery. Van Dijk, Nieuwbeerta and Joudo Larsen (2022) explored the reasons behind these global crime patterns, using data from ICVS and other survey sources. Their findings showed that violent crime is more prevalent in less developed countries as a lack of resources and equality can lead to desperation and resentment.

Moreover, developing countries typically have weaker governance and law implementation, which reduces perceptions of punishment. Conversely, Van Dijk et al. discovered that property and acquisitive crime is more common in affluent areas as there are more “targets” such as high value properties and vehicles. Additionally, denser urban areas such as cities enable more anonymity and movement, so committing acquisitive crimes without being caught is easier. This highlights that people in less developed countries are not more criminal, but rather the crime is different due to situational and economic factors.

The ICVS also enquired about reporting of crime. Globally, a significant number of crimes go unreported. Victims choose not to report crimes due to reasons such as lack of trust in the police, feeling the crime was not serious enough, or fearing retaliation from the offender or others. The fear of crime, even for those that did not feel they had been a victim before, was significant across many countries and had considerable impact on someone’s quality of life. Even in low crime areas, participants would report changing their behaviour for fear of experiencing a crime. For example, avoiding certain areas, not going out at certain times of day, or spending less time out of the house (Ceccato, Langefors & Näsman, 2023).

As seen already, some countries have highly available and highly effective support for victims of crime. The ICVS found that this is the case for wealthier countries, but lower-income countries have limited and even non-existent victim services. Despite this, even in countries with established, accessible victim services, there is a disparity between the support available and the uptake of this support.

Another key finding of the ICVS is the impact of the crime. Whilst impact is profound regardless of the crime, it was found that violent crime is especially impactful for psychological, emotional and financial consequences (Butt, 2023). It is a striking finding that the impact of crime is felt severely across the globe, but engagement in support is relatively low.

Other trends identified from the ICVS were prevalence- and group-related. Generally, victim rates have declined. However, some developing countries are experiencing stagnant or increasing rates. Vulnerable, marginalised groups are also more likely to experience certain types of crime; women, immigrants, and minorities are more likely to experience crimes such as domestic violence or hate crimes (Van Dijk et al., 2021).

Conclusively, the ICVS often found that official crime statistics significantly underreport victim rates. As mentioned above, trust in the law is lacking in many countries which is affecting individuals' engagement in the support available. The ICVS found this especially true for non-violent crimes, such as fraud or theft. The ICVS is a vital survey in painting an accurate picture of victimisation and ensuring that a broader scope of countries is included in the conversation.

Research using ICVS survey data shows that that victim support is inadequate across various countries, so more support, and more accessible support, is needed.

Victim services

As a provision of victim support is within UN legislation and each country's legislation as denoted above, each of these countries have some provision of victim services. Although victims in the UK have rights that are nationally recognised, including the right to access victim services, there is not a single national provider for victim services that is both run and funded by the government. Instead, victim services are run by different organisations such as Catch22 and Victim Support.

This is widely the same across Europe, with only 7 countries having a state-run and funded victim services. While the existence of victim support provision demonstrates recognition of the impact of victimisation, variation in how these services are funded and delivered suggests that there remains scope to strengthen access to consistent and tailored support for victims of crime.

Catch22 victim services

Catch22's victim services are for all victims of crime, adults and children, whether the crime has been reported or not. They support over 30,000 victims each year, to whom they provide free and confidential services. As previously mentioned, Catch22's victim services cover Hertfordshire, Leicestershire, Norfolk, Suffolk, Greater Manchester and Greater London (for people aged 4-17). Each service runs similarly, with each of them adopting a victim-centred, holistic approach, where they focus on reducing re-traumatisation and promoting resilience so victims can develop their own self-sufficiency. Through their services they provide emotional support, practical information, signposting, advocacy and restorative justice. Catch22 as a wider organisation has vast experience and knowledge on the justice system, offenders and victims, which allows them to provide holistic support and link service users with partner organisations to ensure they receive the most relevant support.

Catch22's Victim Services are commissioned by the police. As a result, each service receives a list of individuals that have reported a crime to the police and consented to being contacted by Catch22.

Caseworkers from Catch22 contact identified victims in order of risk and need to discuss the support available and how they could best benefit from our services.

As previously mentioned, those who have not reported the crime can still receive support, but they must refer themselves to Catch22. To drive community engagement, Catch22's services regularly attend public spaces to advertise their services to the public and inform those interested on how to refer.

Due to the individualised nature of services provided, duration of support varies from victim to victim. Therefore, if needs are still high, caseworkers can provide support from the time of victimisation through to the offender's release. This said, due to the high emphasis on independence and resilience, caseworkers aim to provide victims with the tools to support themselves.

This means that victims should eventually be able to manage themselves independently. Caseworkers always refer back to the needs assessment to ensure that support provided is relevant and helpful, and can refer and signpost onto other organisations where required (Catch22, 2025).

Victim Support EU

Victim Support Europe (VSE) is the largest organisation for victim services throughout Europe, supporting three million victims a year in 36 countries (Victim Support Europe, 2025). Its main aims are to work with different European agencies to ensure that victim services run well across Europe, and is co-funded by the European union. In 2020 VSE created a web-based referral system to increase coordination across services and countries. The ability to streamline each country's service onto one online directory means that cross-border support can be offered and that the support is consistent. This also enables increased collaboration and effective information sharing to provide the highest quality victim service.

Victim services Australia

In Australia, support is dependent on which state or territory one resides in. To access services, victims themselves reach out to the organisation that covers their state. One of the providers which works in New South Wales (NSW) is Victim Services. According to the website, *"the NSW Victim's Support Scheme provides assistance to people who have been injured due to a violent crime or modern slavery, and the family members of someone who has died as a result of a homicide or a road crime."* (Victim's Services, 2025) The police can signpost victims to the victim's access line, but they do not refer directly. Moreover, to make a referral to the Victim's Support Scheme in NSW, victims must apply with supporting documents to evidence that the crime has actually been committed. Through the Victim's Support Scheme, victims may be eligible for up to 22 hours of counselling. If the victim experienced child abuse, they may be eligible for more. Victim Support also provides bespoke support to aboriginal people. There is no time limit for application, meaning that victims can apply any time after they have been victimised. However, there can be a time limit to receive services such as financial compensation.

Victims of Crime supports victims in Victoria, South East Australia (Victims of Crime, 2025). Here, they have a helpline where victims can access free services, as well as needs-based, person-centred support. Through this, victims can gain access to the victim's assistance program which provides support including counselling and daily assistance. Their website is informative, providing detail on justice processes and words used in the justice system. It is also practical, as there are options to join an update register, or file an intervention order. Victims of Crime also held LGBTQIA+ resources, and had facilities to support aboriginal people.

Australia has some fantastic services available in some territories, and it is notable that they recognise aboriginal people and have bespoke support for them, but could benefit from wider coverage of more territories. Additionally, needing to prove that the crime occurred restricts many people from reporting the crime, and subsequently seeking support.

Canada

Canada also does not have a national victim service provider; it is instead provided by each province. There is a victim service directory which details all of the different victim service providers across Canada (Policy Centre for Victim Services, 2024). This directory allows victims to input their type of victimisation, select which type of service they would like to receive, and whether they want to share any protected characteristics they have (such as their gender, sexuality, age or disability) and find the most suitable support for them.

Moreover, there are different avenues of victim support provided throughout Canada, with different avenues providing different types of support. There are police-based victim services which can provide information, support and referrals. There are also court-based victim services which can provide court orientation, preparation, and updates on case progress. There are community-based victim services which can provide direct support to victims including emotional support, assistance, information and referrals.

Finally, system-based victim services, which are independent from the police and can help the victim with contact with the criminal justice system. They can provide information, counselling, court preparation and help liaising with police and the courts. Canada is well equipped by providing different mediums of victim support, but a potential downfall is a lack of nationalisation of support, which inhibits access to support based on the territory someone lives in.

Comparison of international services

As detailed above, due to guidelines established under international law, there are a lot of similarities between victim services across different countries. However, there are some important differences that lead to different levels of support provided. One thing that should be noted is that definitions of victimhood vary between countries, which makes comparison more complex.

One feature of a good victim service is having a strong relationship with other agencies (Mawby & Simmonds 2008). This is evident in England and Wales, Canada and Australia, where they receive referrals from the police, who (with consent) pass on information about recent victims of crime. This allows the organisations to make initial contact to offer support that they might have otherwise not known to exist (Mawby & Simmonds 2008). It also helps to reduce re-traumatisation (Duckworth & Follette, 2012) as individuals do not have to self-refer and tell their story to be considered for support. Referrals by the police are important as it has been found that very few victims seek support themselves (Jensen & Thunberg, 2023) and having contact with victim services encourages them to engage with the justice system (Victims Commissioner, 2024).

This is further enhanced by victims having a single point of contact. This approach is used in England and Wales and throughout the EU, allowing victims to only share their story with one caseworker, and not have to repeat the traumatic event multiple times. This is another technique that can prevent re-traumatisation. Victims often get re-traumatised by going through the criminal justice system through interactions with the police and court cases, therefore it is necessary for support provided to be as seamless as possible to mitigate this. (Almeida et al, 2021). Ellard and Campbell (2020) conducted qualitative analysis on victims in Australia, who highlighted the desire for a single point of contact as they believed that this would make the justice process more seamless.

This said, although reaching out to victims firsthand and having a single point of contact is favourable for the victims, it increases caseloads for the caseworkers. In countries with poor connections with the police, the demand for victim services is much lower as new cases are only received via self-referrals (Mawby & Simmonds, 2008). Therefore, by reaching out to victims themselves the service has greater reach, but this could be challenging for smaller services. In Greater Manchester there were 325,164 crimes reported in 2024 (Jones, 2025). At the time of writing, Catch22's GMVS had 22 victim care coordinators.

This shows the significant number of victims that caseworkers must contact each day to provide support to everyone, whilst also delivering care to existing service users. With victim services being tasked to do more with less funding (Victims Commissioner, 2024), this could lead to burnout and reduced care effectiveness.

There are alternatives to potentially reduce caseloads, however this may mean engaging in a less personable service. Victim Support in the UK have a 24-hour live chat, where victims can reach out and text a caseworker for information. However, each time the victim reengages with the service, they are assigned a new caseworker. This approach enables a support option that does not require attending a meeting or in-person session, but it facilitates re-traumatisation and inhibits professional rapport between caseworker and service user. This highlights that there is a balance that must be achieved between making sure that the service can provide comprehensive support, but can provide it to all of those in need. This conflict is further evidenced within Australia's victim service. They offer counselling services to their victims, which is not guaranteed in other countries' services. However, Australian Victim Services only offer this to victims of serious or sexual offences and these individuals must endure an extensive application to qualify.

Moreover, it is important to ensure that victims nationwide can receive similar levels of support. In countries such as Australia, Canada, and the EU, there is a vast difference in support provided dependent on the state that the victim lives in. For example, in Canada, although the victim's services directory can direct victims to specialised support depending on their characteristics, these services are not necessarily available in every city. This means that victims may have to either travel or be referred to less specialised services. Linking back to the ICVS, it found that there is a variety of support provided within Europe (Kesteren et al., 2013).

Therefore, even though they are supported by VSE, victims within each country may receive different services depending on which country they reside in. In England, despite Catch22 providing broadly similar services within each of its four victim services, with comparable links to the police and wider support services, the organisation does not provide national coverage and only supports victims under contracted areas. This therefore means that victims in other areas do not have access to their services and there may be more evident differences between them and other service providers in England.

Conclusion

To conclude, the definition of a victim and the rights that they receive are largely similar internationally. However, globally, victim services are lacking. England & Wales stand out as they include rights for victims of unreported crimes within the legislation. However, crime is existent in every country and efforts should be given to recognising and supporting victims across the world.

It would be beneficial for victim services of different countries to coalesce their victimology, to use the most proven methods to provide the best support. Research has shown that many countries offer a variety of support that can accommodate many different people's individual needs, but the support could be improved by being available and consistent across the entire country.

Overall, the ICVS has been crucial in understanding victim services and victimology across the globe and should continue to be used to permit countries to learn from one another and provide seamless, evidence-based victim support.

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