

**NO**  
discrimination



Rights



Privacy



Safety



Support



Quality



Training



Staff

# Ensuring Quality Of Victim Support Services In Serbia

Multi Donor trust Fund for Justice Sector Support in Serbia in partnership with



November 2018



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## Executive Summary

**Victim support is assistance which should be systematically provided to all victims of crime; it is important to be able to verify the quality of such aid.** Existence of quality standards are important for victims themselves, as knowing that services are subject to scrutiny, can be reassuring. Referral organisations can find it useful to be able to easily identify organisations to which they can send victims, with confidence in the quality of the service offered. Governments and donors can find it valuable to be able to easily assess the qualifications of an organisation when funding is being allocated. In addition, given the specific vulnerabilities of victims of crimes, it is a priority that the service should be of the required standard as to avoid further traumatisation and re-victimisation.

**Approach to ensuring quality standards varies in comparative practices.** Some countries have a rigorous approach to ensure quality assurance systems for victim support services<sup>1</sup>: organisations embrace existing systems, such as ISO standards – as is the case in Portugal. Other countries introduce their own rigorous measurements, such as the Marianne Charter in France, which sets standards for quality of services provided by French administrative bodies. In other instances there are elaborate internalised processes for imposing quality standards on victim support services: for example, the membership policies of France Victimes, the French federation of victim support, which brings together 130 member associations across all French territories.

**The objective of introducing standards should not be to exclude non-compliant organisations but rather to help them raise the calibre of their operational capabilities.** Guidelines should be used as encouragement for, rather than imposing restrictions and administrative burdens on, organisations. Standards are essential to the improvement of programs and while levels of expectation and specific requirements need to be set, along with rules applicable to specific forms of services (e.g. legal aid or psychological support), they should not prohibit the support offered to victims of crime, but rather should encourage organisations to improve their care and allow them to better respond to victims' needs.

**The report proposes a set of tailored standards for Serbian victim support providers.** The proposed standards should be acceptable to and seen as valuable by different stakeholders from policy makers to NGOs and the judiciary. In addition, a draft guidance document will explain the individual elements, as well as suggesting a set of indicators to verify the correct application of the standards and provide practical tools to help organisations comply with the suggested quality assurance systems.

**Proposed criteria have been developed with the cooperation of Serbian stakeholders and include features common to existing guidelines.** The 8 standards proposed are:

1. Services are available without discrimination
2. Respect the dignity, rights, needs and feelings of the victim
3. Ensure the confidentiality and privacy of the victim

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<sup>1</sup> Any reference to the term victim support service (victims' service, support service or service) in this report is to be understood in line with the provision of article 8 of the Directive 2012/29/EU of the European Parliament and of the Council of 25 October 2012 establishing minimum standards on the rights, support and protection of victims of crime, and replacing Council Framework Decision 2001/220/JHA

4. Ensure the safety and security of victims and service providers
5. Provide a variety of support options
6. Provide quality control through the monitoring and evaluation of service provision
7. Provide adequate and appropriate training for all staff and volunteers who work with victims
8. Services are provided by staff and volunteers

**As a minimum guarantee of conformity, the future Serbian system of quality standards for victim support services needs to ensure an independent and unbiased verification of compliance with standards.** The approach will depend on many factors, including the time and resources available, as well as the circumstances and context within which standards will be introduced.

**The report requires informed decision making by Serbian stakeholders to decide which path to take in the adoption of the proposed standards.** Whether these criteria will be adopted, or other priorities will be set; whether standards will be imposed through a governmental instrument or adopted by victim support providers; whether they will be controlled through a rigorous system of licencing or through a softer approach of study visits, evaluations and internal regulation – all very important – are decisions to be taken by interested parties in Serbia. There are benefits and shortcomings in each approach and standardisation needs to be the outcome of in-depth discussion and agreement between the governmental and non-governmental actors, working towards better services for victims of crimes.



# 1 Introduction

**1. In Europe, victims support services play a crucial role in responding to needs of victims of crime.** In Serbia, as in other European countries, victim support assistance is provided through non-governmental (NGO) and governmental bodies<sup>2</sup>. Providing help to victims of crimes requires specific skills, expertise and knowledge and failure to administer support for victims in an appropriate manner can not only be harmful to victims but can also be costly for all concerned. Substandard support can ultimately damage the reputation of NGOs and victim support bodies in the eyes of the public thus discouraging potential victims from seeking much needed support. Unfortunately, at present, it is difficult to assess the quality of the assistance provided in Serbia, apart from the personal experience and the word of mouth recommendations of victims who have benefitted from their interaction with individual organisations.

**2. The establishment of suitable standards ensures that victim support organisations operate in a manner which makes them cost effective, safe, and able to deliver a good quality of service.** In their essence, operational standards ensure that victim support organisations deliver a level of support which achieves the aims they have been established for.

**3. To guarantee to victims the highest level of service possible, a system of quality standards and an associated accreditation process can be very beneficial.** Victims can be reassured that the help they are receiving is being provided in line with certain requirements and are delivered according to an established set of rules. Organisations looking to refer a victim to a specific organisation can find it useful to be able to identify where to send victims for the support they need, knowing that victims will receive a good level of service. Governments and donors can find it valuable to be able to easily assess the good standing of an organisation, to be able to make their decisions on how to allocate funding. Viewed as such, quality standards are an extremely useful tool to guide victim support organisations in developing high quality, effective, efficient and consistent resources.

**4. The development of standards and a system of accreditation for victim support service providers can help ensure that minimum quality standards are achieved by victim support providers in line with Directive 2012/29/EU establishing minimum standards on the rights, support and protection of victims of crime<sup>3</sup> (hereafter the Victims' Rights Directive).** Recital 63 of the Victims' Directive stresses that "in order to encourage and facilitate reporting of crimes and to allow victims to break the cycle of repeat victimisation, it is essential that reliable support facilities are available to victims and that competent authorities are prepared to respond to victims' reports in a respectful, sensitive, professional and non-discriminatory manner". Member States are therefore obliged to ensure and control the quality of support services for victims of crimes.

**5. Quality standards specify the minimum conditions that service providers should meet to deliver assistance of a satisfactory level of quality and how the fulfilment of these standards should be measured.** Normally, standards should be conducive to a better quality of support, but also to

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<sup>2</sup> Analysis of victims' rights and services in Serbia and their alignment with EU Directive 2012-29-EU, Multi-Donor Trust Fund for Justice Sector Support in Serbia, World Bank in partnership with Victim Support Europe, June 2016

<sup>3</sup> Directive 2012/29/EU of the European Parliament and of the Council of 25 October 2012 establishing minimum standards on the rights, support and protection of victims of crime, and replacing Council Framework Decision 2001/220/JHA

ensuring that such quality is equally available to all. The overall aim of quality standards is to ensure that resources meet the needs and expectations primarily of users, but also of stakeholders and funders. Standards help organisations improve and structure their activities and make it easier to foster collaboration between organisations in sharing good practices and policies. These standards affirm that the individual mission and goals of each organisation remain relevant the purpose for which the standards are being adopted and implemented.

**6. Two main categories of standards can be identified: service standards and organisational/governance standards.** Service criteria help define what a user can expect from a particular resource and to remind management and workers of the obligations that they face when working with victims of crime. Organisational or governance standards focus on the nature of the organisation in which a service is delivered. These guidelines concentrate on how the ‘business’ of victim support is being done. They focus on governance, human and financial management, legal and administrative procedures and requirements and other practical and formal issues necessary to keep an organisation or an institution running in an efficient and transparent manner.

**7. The report focuses only on services (or quality) standards and will not cover the issue of organisational standards, as these issues are usually a matter of national legislation and established professional practices.** This is the case in Serbia where the Associations Act<sup>4</sup> and the Endowments and Foundations Act<sup>5</sup> regulate the creation and operation of non-profit organisations, while the operations of state provided facilities are regulated by the Court Organisation Act<sup>6</sup>, Social Protection Act<sup>7</sup> and a set of other applicable laws and rules, which ensure that some forms of victim support is provided through courts, prosecutors’ office as well as social and other public services. This report aims at giving an overview of best practices and existing quality guidelines and accreditation systems in different countries and offers to the Serbian stakeholders a similar approach to standards and accreditation that could apply in the country.

**8. The question of benchmarks for victim services was an issue raised by Serbian authorities and both state and non-governmental service providers as a matter of interest and as a need identified in practice.** Regardless of all the social media tools available today, it is difficult to check the quality of assistance provided by some actors simply by checking their websites or by contacting them: and a verifiable recognition of quality assurance is lacking. In the absence of an easy check system, there is a risk of referring victims to organisations which provide substandard facilities, or which simply do not provide the resources they advertise.

**9. To develop standards for one country, it is important to identify the most commonly applied standards in other countries.** This report is based on a broad analysis of existing standards in EU and non-EU countries with a focus on the victim support sector and, more generally, on the NGO sector. This report will:

- Examine and compare current standards and accreditation systems;
- Determine the objectives and benefits of standards and accreditation systems;

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<sup>4</sup> *Zakon o udruženjima*, Official Gazette Nos. br. 51/2009 and 99/2011.

<sup>5</sup> *Zakon o zadužbinama i fondacijama*, Official Gazette Nos. br. 88/2010 and 99/2011.

<sup>6</sup> *Zakon o uredjenju sudova*, Official Gazette Nos. 116/2008, 104/2009, 101/2010 and 31/2011.

<sup>7</sup> *Zakon o socijalnoj zastiti*, Official Gazette No. 24/2011.

- Suggest a list of standards that could be applied to victim support services in Serbia.

**10. A broad range of stakeholders were consulted in the preparation of this proposal.** Initial consultations with stakeholders were conducted in October and November 2017. In June 2018, a focus group was convened, and all relevant stakeholders - judiciary and prosecutors, service providers and professionals of victim support, both from Belgrade and regional centres - were given an opportunity to discuss the proposed standards and to contribute to their development.

**11. Having conducted extensive desk research, stakeholder consultations and analysis of different standards and/or accreditation systems, the report focuses on six examples which were found to be most relevant.** Based on a comparative analysis of standards and accreditation systems for victim support organisations as well as specific Serbian needs, this report offers an overview of the different systems studied in order to identify the most appropriate model for Serbian victim support services.

## 2 Introducing Standards and Certifying Compliance in Comparative Practices

**12. To better understand the establishment of standards and accreditation systems, it is necessary to analyse the different approaches in more detail.** Each system is different in its dealing with conditions for compliance and consequences of non-compliance. The systems reviewed represent a combination of approaches: a State introduced voluntary standards (French Marianne Charter), international NGO both voluntary and compulsory standards (ISO, VSE), national NGO compulsory standards (France Victimes and Weisser Ring), as well as a unique set of standards introduced by a company (Supporting Justice).

**13.** The introduction of quality standards for victim support services aims to ensure a high quality of service and not add a burden on the service. The State should not introduce unrealistic compliance requirements for NGOs or associations working with victims of crime: an inability to comply would leave the victims unassisted and unsupported.

### 2.1 Developing standards of services

**14. The primary aim of introducing quality standards and/or accreditation systems should be improving the quality of victim support services and maintenance of certain quality levels.** The introduction of standards is an important process and, if put in place, should be followed rigorously. Some secondary goals may include: control of funding, ease of identification of services or facilitating exchange or networking.

**15. An assessment of the objectives for the introduction of a set of standards is key to the development of a standards system.** The result of this exercise should be a clear set of objectives that need to be achieved by the introduction of any rules, e.g. how will quality be achieved, improved and measured, to whom will the service be provided or how it will be delivered to the best satisfaction of the end user – the victim. These objectives are set out below:

#### Objectives of standards and accreditation systems for victim support services

- **Enhance victim support system** by establishing optimal achievement goals in meeting standards
- **Continuous quality improvement:** victims should receive the best service possible targeted to their needs
- **Improved consistency in services:** victims should receive the same level of service no matter where they are
- **Strengthen the public's confidence** in the quality of victim support services

**16. Standards can be introduced into the system of victim support provision through several different approaches.** Whether they will be applied through a governmental instrument,

democratically adopted by all victim support providers or self-imposed by individual providers is a matter of discussion at the national level. Compliance with standards, controlled through a rigorous system of licencing or through a softer approach of study visits, evaluations and internal regulation, will also need to be decided by interested parties in Serbia. In terms of a formal adoption of standards, it is important to achieve a broad consensus on how to formulate the benchmarks for the victim support systems.

**17. The introduction and certification, depending on the forms they take, will incur a certain level of cost.** The preliminary cost-benefit analysis of victim support in Serbia<sup>8</sup>, looks at financial factors that will impact the development and implementation of service standards. Cost-benefit discussions between various stakeholders will need to take place before quality assurance systems can be applied.

## 2.2 Different approaches to introducing standards

**18. At either international or national level, governmental and non-governmental bodies can introduce compulsory or voluntary quality standards for victim support services.** The report provides an overview of the most important standards for victim support services.

**19. The most notable compulsory international standards in the provision of victim support services are the Council of Europe minimum standards for support services combatting all forms of violence against women.** These minimum criteria apply to all Council of Europe member States (including Serbia) and insist on the introduction of adequate services to support women victims of violence. These standards determine the types of services that should be provided to victims, as well as the minimum levels of provision for the most critical services<sup>9</sup> and are directed at Member States, setting an expectation upon them to ensure the required level of implementation. However, it is up to the individual Member States to choose whether or not to enforce these standards: while there is no retaliatory action for those who choose not to, they still play an important role in at least two ways. On the one hand, such international standards provide an important advocacy platform for organisations from which to argue the need for better or more services at the national level. On the other hand, they also give a tool to other members of the Council of Europe to apply pressure on non-compliant States to invest more into critical services.

**20. International governmental bodies can also introduce voluntary standards, to which the states may opt in.** In an attempt to ensure accessibility and quality of a Europe-wide service, the European Commission adopted a Decision reserving the national telephone numbering range beginning with '116XXX' to harmonise numbers across its Member States for harmonised services of social value and created specific criteria for Member States to establish these helplines<sup>10</sup>.

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<sup>8</sup> Victim Support Europe, Cost-benefit analysis of victim support services in Serbia, 2018, pending publication.

<sup>9</sup> These services include: telephone helplines, counselling and intervention services, shelters/refuges, sexual assault referral and rape crisis centres. See Combating violence against women: minimum standards for support services, Directorate General of Human Rights and Legal Affairs Council of Europe Strasbourg, September 2008, available at: [https://www.coe.int/t/dg2/equality/domesticviolencecampaign/Source/EG-VAW-CONF\(2007\)Study%20rev.en.pdf](https://www.coe.int/t/dg2/equality/domesticviolencecampaign/Source/EG-VAW-CONF(2007)Study%20rev.en.pdf)

<sup>10</sup> According to Article 4 of the Decision, these conditions are: "(a) the service provides information, or assistance, or a reporting tool to citizens, or any combination thereof; (b) the service is open to all citizens without any requirement of prior registration; (c) the service is not time-limited; (d) there is no payment, or payment commitment as a pre-requisite to

**21. States themselves are often seen as regulators of publicly provided services.** This type of regulation is quite common and can be, depending on the country and context, either compulsory for each provider and a precondition to licensing, or voluntary for providers who want to achieve a higher level of performance. The former type can be observed in the existing standards for social services in Serbia. An example of the latter is the Marianne Charter for French public services wishing to demonstrate that they have reached a certain level of excellence in their relation with the user<sup>11</sup>.

**22. Apart from the above external governmental regulations, standardisation can also be achieved at the non-governmental level.** The best known standardisation of this type is demonstrated by ISO Standards. The International Standardisation Organisation (ISO) is a non-governmental organisation with a world-wide membership and global recognition. ISO standards are recognised benchmarks of quality control, and while they have not developed standards specific for victim support services, some providers, such as APAV, have opted to introduce certain ISO quality standards

**23. More specific approaches to standardisation can be taken by specialist international non-governmental organisations, which can aim to develop criteria specific to their area of expertise, to ensure a certain level of conformity in their membership, or a part thereof.** This is the case, for example, of VSE's guidelines that are compulsory for all full members, and optional for the rest of the membership<sup>12</sup>.

**24. National NGOs can also develop standards, that are either required for all those who want to be associated with them, or voluntary, as a recommendation for good practice.** An example of the former may be seen in standards applied in France Victimes, who have developed an elaborate process for the fitness check-in of their member organisations, in order to ensure a quality service for all victims supported by the existing 130, or any other future, member organisations of France Victimes<sup>13</sup>. The latter can be found in many non-governmental entities, primarily in non-governmental organisations, but also in other types of private law entities companies. One such unique example are the standards suggested by Supporting Justice<sup>14</sup>.

**25. Finally, criteria can be developed not to apply to organisations themselves, but to individuals who provide services to victims.** This is usually done on the national level through the systems of licencing for certain professions (lawyers, doctors, psychologists). However, apart from this rigid, formal and very demanding approach which is indeed justified in certain professional fields, a set of standards, such as the one developed by Weisser Ring in Germany for their volunteers, may add new value to volunteering and to the provision of important services to victims of crimes.

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use the service; (e) the following activities are excluded during a call: advertisement, entertainment, marketing and selling, using the call for the future selling of commercial services.", 2007/116/EC: Commission Decision of 15 February 2007 on reserving the national numbering range beginning with 116 for harmonised numbers for harmonised services of social value, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32007D0116>

<sup>11</sup> Le référentiel Marianne – nouvelle version (Sept. 2016), Le portail de la modernisation de l'action publique, available at: <http://www.modernisation.gouv.fr/etudes-et-referentiels/referentiels/le-referentiel-marianne-nouvelle-version>

<sup>12</sup> Full VSE members must be non-governmental organisations which provide generic victim support services to victims on the entire territory of their country. Conditions for associate membership are more flexible. For more info see VSE, Become a member, available at: <https://victimsupport.eu/get-involved/become-a-member/>.

<sup>13</sup> Charte IVANEM <http://www.france-victimes.fr/index.php/docman/grand-public/fv-vie-interne>

<sup>14</sup> Victims Choice Quality Mark, Supporting Justice UK, <http://supportingjustice.org.uk/quality-mark/>

Figure 1: Types of standards of services

Who adopts standards and how are they applied

		Compulsory	Voluntary
Governmental	International	Council of Europe minimum standards for support services combatting violence against women	European Commission 116 Helplines
	National	Serbian standards on social services	Marianne Charter (France)
Non-governmental	International	VSE standards for full members	ISO standards
	National	France Victimes Charter to access membership	Supporting Justice

**26. Most standards, compulsory or voluntary, will be accompanied by a process of verification, which will result in accreditation or certification of the service provider.** The process of verification can be devised in a number of different ways, and the initial accreditation may be followed by periodic or occasional controls, audits or renewals. Victims may be given an opportunity to complain against non-compliance, either to the service provider themselves or to an external mechanism.

**27. Verification of compliance and ensuring the maintenance of the required level of quality may be self-controlled or controlled externally with the involvement of private or public bodies.** These bodies may control standards they introduced themselves (e.g. governments imposing and verifying standards) or may review compliance of standards imposed by other institutions or bodies (e.g. independent third party evaluations by private companies or the victims' commissioner).

**28. Verification of compliance is conducted initially to grant accreditation, but should continue throughout the implementation of standards, by means of grievances procedures and/or periodic verification of compliance by an independent body.** All of the systems observed introduce some form of complaints or grievances procedure, where victims or other actors can introduce a complaint for non-compliance with standards. In the case of ISO standards, certification needs to be renewed every three years. In the case of some licencing procedures (e.g. Serbian standards for social services), a licence is only granted for a limited period of time and service cannot be provided unless the licence is renewed.

### 2.3 Analysis of existing standardisation systems in Europe

**29. Six different standardisation systems have been analysed and compared.** Each sub-chapter presents one system with reasons for the introduction of its standards, the procedure of accreditation, and the monitoring and complaints procedure in place, in case of non-compliance.

**30. These six standardisation systems (the French Marianne Charter, ISO, VSE, Supporting Justice, France Victimes and Weisser Ring) have been selected as representing commendable practices, showcasing the different approaches to the introduction of standards for (or applicable to) victim support service.** They reflect the different procedures in place for the establishment of a standards and accreditation system (via a government, an external entity or an NGO), the different procedures of accreditation (self-evaluation, monitoring by an external body, or an independent procedure) and the consequences for non-compliance. Each of them is relevant to the Serbian context as it gives Serbian stakeholders an opportunity to learn from existing approaches and choose which standards to apply to its own system.

### **2.3.1 France: The Marianne Charter**

**31. In France, public administrative bodies wishing to demonstrate they have reached a level of excellence in their approach to the user and the provision of service, may do so by complying with the Marianne Charter and obtaining the Marianne label<sup>15</sup>.** While there is no obstacle for any entity to voluntarily abide by the standards, the label itself can only be claimed by compliant French administrative entities<sup>16</sup>. The Marianne Charter was first introduced in 2004, with the aim to make the quality of the users' reception a shared value of all the services of the State through establishing a set of common commitments<sup>17</sup>.

**32. In 2016, the French government amended the Marianne Charter to adapt it to increased demand, and further advance the quality of services provided to citizens.** This demonstrates that standards are a living instrument, which can and should adjust to the developing needs of users, but also to better respond to changing realities. In 2016, the Marianne Charter was revised to better support users with online services and the stronger involvement of service providers in relation to users. The system is supported by a methodological kit, incorporating an online self-assessment tool. The 2016 version reinforced the key points of the previous standards but also introduced new commitments to meet new requirements:

- Better support for users in the use of online services;
- New commitments regarding processes and response times, which take into account the latest legal developments including the online referral procedure<sup>18</sup>;
- A greater inclusion of users in the evolution of services;
- Tools, training and stronger involvement of administration agents in relation to users.

**33. The Marianne Charter contains 5 categories divided into 12 commitments.** The 5 categories are: effective information to users, welcoming of users, clear and timely response, monitoring and

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<sup>15</sup> See, Le référentiel Marianne – nouvelle version (Sept. 2016), Le portail de la modernisation de l'action publique, available at: <http://www.modernisation.gouv.fr/etudes-et-referentiels/referentiels/le-referentiel-marianne-nouvelle-version>

<sup>16</sup> Article L100-3 du code des relations entre le public et l'administration, available at: [https://www.legifrance.gouv.fr/affichCode.do?sessionId=B6D53E22E312B68C6C1E6942DCF21F8F.tpdila18v\\_1?idSectionT A=LEGISCTA000031367302&cidTexte=LEGITEXT000031366350&dateTexte=20160921](https://www.legifrance.gouv.fr/affichCode.do?sessionId=B6D53E22E312B68C6C1E6942DCF21F8F.tpdila18v_1?idSectionT A=LEGISCTA000031367302&cidTexte=LEGITEXT000031366350&dateTexte=20160921)

<sup>17</sup> La Charte Marianne, occasion d'instaurer une logique d'engagement de service dans les services de l'Etat : « pour un meilleur accueil », Marielle Breas, 2006, available in French at : [https://www.persee.fr/doc/pomap\\_0758-1726\\_2006\\_num\\_24\\_4\\_2351](https://www.persee.fr/doc/pomap_0758-1726_2006_num_24_4_2351)

<sup>18</sup> Fiche pratique, Saisine d'une administration par voie électronique, 24 avril 2017, Direction de l'information légale et administrative, Service Public, available at: <https://www.service-public.fr/particuliers/vosdroits/F33312>



evaluation, and commitments to service. Ten commitments are addressed to users and 2 commitments concern agents working in the service.

Figure 2: The 12 commitments of the Marianne Charter<sup>19</sup>

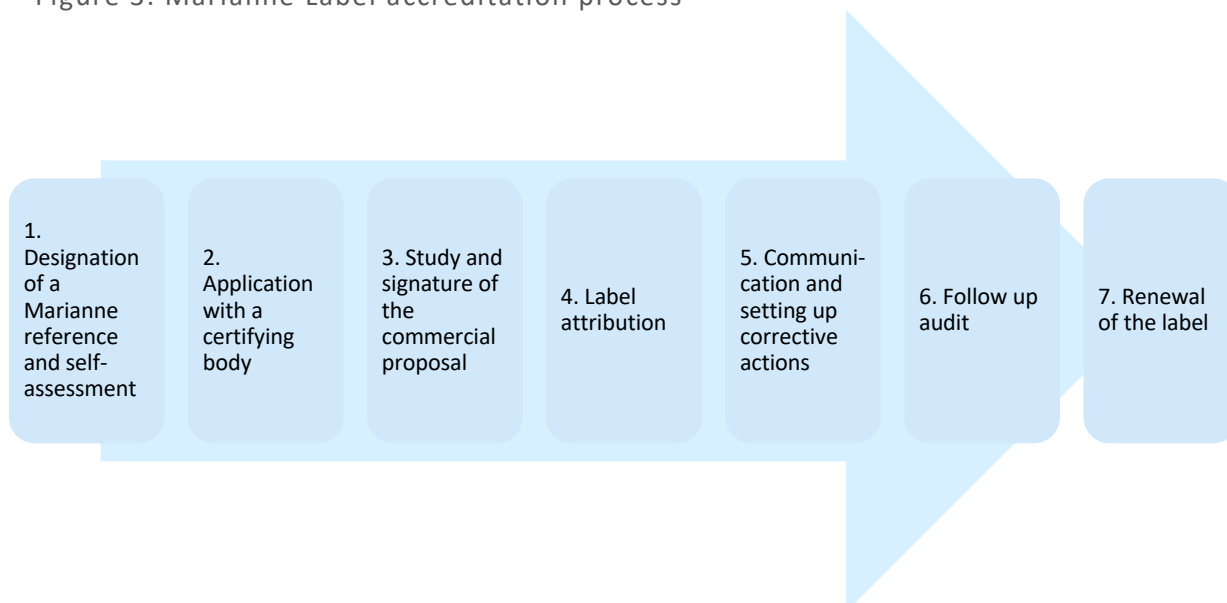
<p><b>I. Information that meets user expectations</b></p>	<ul style="list-style-type: none"> <li>• 1. We bring you the essential information to guide you through our procedures and we make sure to update them on all media</li> <li>• 2. We facilitate the use of our services on the internet and make our services available online</li> <li>• 3. We direct you to the right service or to the competent administration and we assist you in your administrative requests</li> </ul>
<p><b>II. A warm and caring welcome</b></p>	<ul style="list-style-type: none"> <li>• 4. We welcome you with courtesy and respect, we inform you of your waiting time, and we ensure your comfort</li> <li>• 5. We facilitate access to procedures for people with disabilities</li> <li>• 6. We welcome people in situations of difficulty</li> </ul>
<p><b>III. Clear and timely reply to users</b></p>	<ul style="list-style-type: none"> <li>• 7. We respond clearly and accurately to your requests and your claims</li> <li>• 8. We answer all your calls while minimising your waiting time</li> </ul>
<p><b>IV. Monitoring and evaluation</b></p>	<ul style="list-style-type: none"> <li>• 9. We use your feedback and suggestions to improve our services</li> <li>• 10. We regularly evaluate your satisfaction and we communicate the results of these evaluations</li> </ul>
<p><b>V. The public service is committed to its staff</b></p>	<ul style="list-style-type: none"> <li>• 11. We train our employees and give them the tools they need to guide and facilitate the user process</li> <li>• 12. We evaluate our practices, we involve our employees and we take into account their feedback to improve the quality of service</li> </ul>

**34. There are seven steps in the process of certification to obtain the Marianne label.** The Marianne label is issued by one of four independent certifying bodies<sup>20</sup> authorised by the General Secretariat for the Modernisation of Public Action (SGMAP) after an on-site audit to verify the compliance of practice and results against the Marianne commitments. A follow up audit is carried out 18 months after being awarded the label. The label is valid for 3 years and certifies that Marianne commitments are respected. The certifying body will invite the recipient to request renewal 8 months before the end of the 3 years.

<sup>19</sup> Translation from French

<sup>20</sup> The four certifying bodies are Afnor, LNE, Bureau Veritas and Lloyd' Register LRQA.

Figure 3: Marianne Label accreditation process



**35.** After being awarded the label, the certified organisation is authorised to use the Marianne logo in its communications, in accordance with the Marianne communication charter. The logo reassures users of the quality of the service. The process of accreditation is voluntary and the label marks the recognition of adherence to the Marianne standards by a public body. It represents, for users, a guarantee of the quality of the services available. The Marianne certification can be part of a broader quality approach, and may constitute a first step towards ISO 9001 qualification by structuring a high quality of user approach.

Figure 4: Marianne logo



**36.** The accredited administrations recognise the profound changes in the organisation and management of applications coming into their services. The result is a more accessible and humane administration which takes into account users and enhances the work of its agents<sup>21</sup>.

**37.** **This model is a closed system – it is limited only to public administrative bodies.** Such a closed system ensures the French authorities that a limited number of services can guarantee a high quality service for users and can therefore more easily control them and that a high level of control and certification can be ensured. Nonetheless, the disadvantage of such a system is that it prevents other entities, who might want to challenge themselves to provide the same level of service, to be officially recognised as compliant with the standards and to use the label. However, private services, including victim support organisations, can draw inspiration from the Marianne Charter and apply these standards to their own work with victims, even if the official recognition may not be forthcoming.

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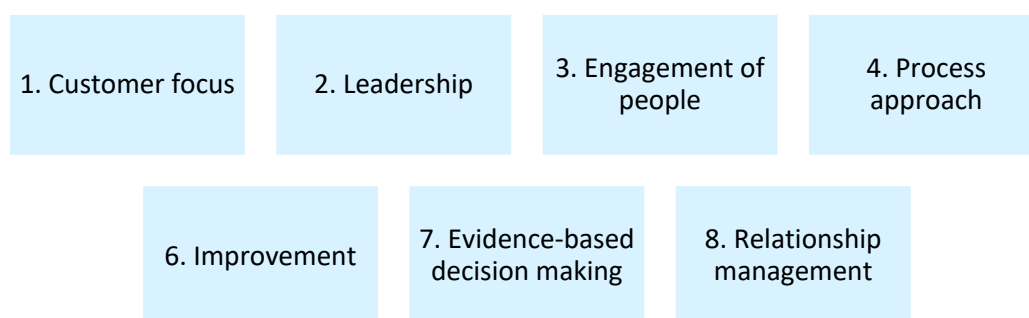
<sup>21</sup> <http://www.modernisation.gouv.fr/home/le-projet-marianne>

### 2.3.2 ISO standards

**38. The International Organisation for Standardisation (ISO)<sup>22</sup> is an independent non-governmental and non-profit organisation and the world's largest developer of international Standards.** It develops series of standards in the forms of requirements, specifications, guidelines or characteristics that can be used to ensure that materials, products, processes and services are fit for their purpose. ISO Standards instil confidence in the product. The user can rest assured that the product or service is safe, reliable and of good quality.

**39. ISO offers a range of standards in various categories, some of which are applicable for victim support organisations.** One such standard is ISO 9001 which certifies the quality of management<sup>23</sup>. Based on eight quality management principles, the ISO 9001:2015 standard defines the way an organisation operates to meet the requirements of its customers and stakeholders. ISO 9001:2015 sets out the criteria for a quality management system<sup>24</sup>:

Figure 5: ISO 9001:2015 quality management principles



**40. Certification follows successful completion of an audit against the ISO 9001 principles and enables organisations to: operate more efficiently, meet statutory and regulatory requirements, reach new markets and identify and address risks.** It is important to note that ISO itself does not provide certification of conformity assessment, this is done by external certification bodies. Unlike French administrations certified with the Marianne logo, organisations or businesses that received a certain ISO certification cannot use the ISO logo, but can label a product, a system or a service “ISO 9001:2015 certified”. Certified services receive a written assurance by an independent body that the product, service or system meets specific requirement.

**41. The Portuguese Association for Victim Support (APAV) received ISO 9001:2015 certification, according to which APAV promotes the continuous improvement of its internal working methods.**

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<sup>22</sup> <https://www.iso.org/standards.html>

<sup>23</sup> Quality management principles, available at: <https://www.iso.org/files/live/sites/isoorg/files/archive/pdf/en/pub100080.pdf>

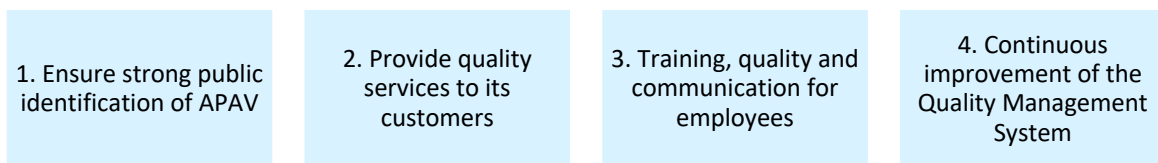
<sup>24</sup> A quality management system is a “formalised system that documents processes, procedures, and responsibilities for achieving quality policies and objectives” (<http://asq.org/learn-about-quality/quality-management-system/>)

The standard assures users that APAV implements a Quality Management System for its head offices<sup>25</sup>. To maintain compliance with the standard, APAV headquarters aim to fulfil the following objectives:

- Victim Satisfaction
- Human Capital Development
- Continuous Improvement
- Recognition of the role of APAV

**42.** To this end, APAV's head office maintains committed to the certain indicators of quality to comply with ISO Standard 9001:2015. These indicators reflect the dedication to quality for both victims and staff, as well as the continuous work to ensure that APAV's services are improving, and are recognisable, and identifiable by the public.

Figure 6: APAV quality commitments



**43.** **In the case of serious non-compliance of the rules developed in conformity with ISO (putting a victim's life at risk, for example), there is a system in place to ensure that quality is maintained.** In the case of APAV, the President would have to appoint two staff members (the Secretary General and a senior officer – depending on the issue), to be in charge of an internal audit procedure. The audit would make sure that all parties are heard and a report is prepared. The report would then be presented to the Board, which would take a final decision and set measures to remedy the situation (a warning, dismissal of the staff member responsible, or other appropriate measures)<sup>26</sup>. In the case of non-compliance with ISO standards, APAV risks losing ISO certification. The certification is valid for three year-period from the date of initial certification.

**44.** **APAV experienced a significant change after implementing ISO quality standards.** While the compliance procedures were cumbersome, as internal procedures needed to be written and practices adopted, the system is working well now and APAV testifies that staff feel a positive difference in the organisational management and in its relationship with stakeholders. Having successfully implemented the ISO 9001 standards in its head offices, APAV intends to work on extending the implementation of these standards to its local branches. They are also looking into implementing VSE standards as APAV is a full member of VSE. In parallel with the ISO standards on Quality Management System, APAV has also developed a monitoring and audit programme, which observes the quality of the support services provided to victims of crime by APAV local offices.

**45.** **ISO 9001:2015 set of standards is more focused on organisational standards than service standards and is therefore not best adapted to ensure quality of victim support services, but can**

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<sup>25</sup> [https://apav.pt/apav\\_v3/index.php/pt/apav-1/qualidade](https://apav.pt/apav_v3/index.php/pt/apav-1/qualidade)

<sup>26</sup> Information received during interview with APAV.

**certainly ensure a better management in an organisation.** ISO standards can cover a range of different aspects of an organisation and are internationally recognised as representing confidence, safety, and good quality. This can be a beneficial added value, providing reassurance to victims and stakeholders about the seriousness of the approach of an organisation.

### 2.3.3 VSE

**46. Recently, VSE has developed minimum standards to be met by full member organisations<sup>27</sup>.**

The VSE Constitution explicitly recognises the possibility for VSE to develop an accreditation system for its members. Taking into consideration that a standards and accreditation system can be expensive to administer and difficult to maintain, VSE decided to take a gradual approach. VSE first developed a common view on what minimum standards all full members could be expected to adhere to. These minimum standards form the basis for a feasibility study on the development of a VSE accreditation system. However, as the standards have only recently been introduced, the accreditation of members is still ongoing.

**47. The system of standards for VSE full members came as a consequence of extensive consultations with members.** Before introducing the system, an extensive desk review had been conducted to identify standards, guidelines, quality assurance mechanisms and accreditation systems applied around the world by:

- Organisations providing victim support,
- Services/NGOs in other sectors e.g. refugee services provision, psychosocial care provision,
- International organisations e.g. UN, FRA,
- Accreditation companies e.g. ISO.

**48. A list of 9 standards have been produced to ensure consistent minimum standards across full member organisations, to be able to show the quality of victim support services to funders and partners and to improve assistance for victims of crime across Europe.<sup>28</sup>** The standards are focused on quality of victims as well as organisational issues such as structural governance and monitoring and evaluation procedures

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<sup>27</sup> Developing victim support across Europe, Quality, Standards, Capacity Building, VSE Annual Conference and General Meeting, 14-17 May 2017, Warsaw Poland, Workshop Programme, available at: [http://victimsupporteurope.eu/activeapp/wp-content/uploads/2014/01/Workshop-programme\\_25-4-2014.pdf](http://victimsupporteurope.eu/activeapp/wp-content/uploads/2014/01/Workshop-programme_25-4-2014.pdf)

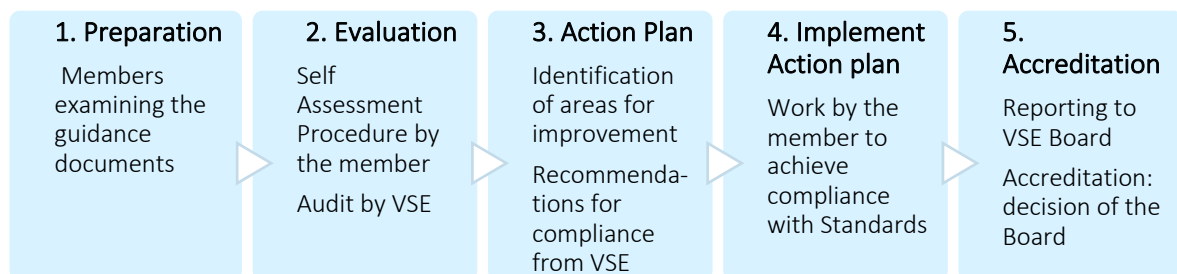
<sup>28</sup> In addition to these minimum standards, VSE established conditions for full membership in VSE which are: (1) NGOs; (2) from Council of Europe member States; (3) provide services to all victims of all crimes; (4) working at national/State level etc. For full list of conditions for membership see: <https://victimsupport.eu/get-involved/become-a-member/>.

Figure 7: VSE standards for full membership



**49. VSE Standards were developed through a participatory process.** This process involved the membership articulating the scope of quality requirements for accreditation of victim support service providers. VSE accreditation process lasts 3 years and is composed of 5 steps:

Figure 8: VSE Accreditation Procedure



**50.** For VSE, the establishment of standards was essential to provide assurance to victims and other users of services that VSE member organisations ensure consistent minimum standards across its members. The standards are set to help members develop their systems and services. The standards have not been established as an obstacle to membership, but as an attainable goal, that can be achieved not in isolation but in cooperation with other members and the VSE staff and management team.

**51. In the case of noncompliance with the standards after the accreditation, there is a verification process in place, which can lead to the removal of accreditation.** The verification process may be initiated by a complaint received from a victim, user or member, or from issues identified through contacts, or based on any other information, which might indicate that the member is no longer compliant. Withdrawal of accreditation does not mean the expulsion from membership, rather it will be a sign that the organisation needs further support to improve its approach and better serve victims. Nonetheless, if all effort fails it may be decided that membership will be suspended.

### 2.3.4 Supporting Justice UK: Victims Choice Quality Mark Standards

52. Supporting Justice is a community interest company that works predominantly in the criminal justice arena, with a focus on issues affecting victims, witnesses and their needs. Supporting Justice do not directly deliver any frontline victim service but works with third sector organisations and statutory organisations in the United Kingdom to help them improve their services through standards. Supporting Justice is composed of experts in the field of victim and witness care which make their expertise valued and recognised.

53. **Recognising that there was not one single entity working with victims in the United Kingdom, Supporting Justice has developed a set of standards to guarantee victims and witnesses access to a service of quality.** In the development of their standards, Supporting Justice analysed good practices in victim care and the needs of people affected by crime. The analysis resulted in the proposal of five standards: access, needs, respect, support and safety<sup>29</sup>:

Figure 9: Victims Choice Quality Mark standards

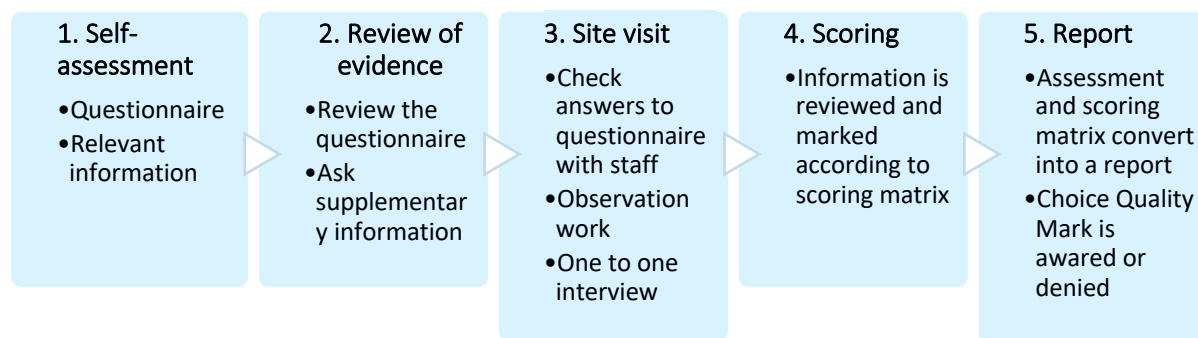


54. **The Victims Choice Quality Mark is obtained through an independent assessment by Supporting Justice.** The assessment looks at whether there is enough evidence to meet each standard. Where a provider is able to evidence that they meet all the criteria for each of the standards, they are awarded an appropriate quality mark. The quality mark demonstrates that the organisation delivers what victims need, and in meeting the standards, there is an assurance for victims and witnesses that excellent victim care is attained.

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<sup>29</sup> To measure if these standards were relevant to victims of crime a public survey was disseminated. When asked about how important these standards were when looking for a service and receiving a service, respondents felt that these standards would, if delivered, help meet their needs. See: Driving service standards and information for victims, Victims Choice UK, 25<sup>th</sup> July 2017, available at: <https://victimschoice.org.uk/articles/view/11>

Figure 10: Supporting Justice process of assessment of the Victims Choice Quality Mark



**55. The Victims Choice Quality Mark focuses on the support a victim will receive rather than on the organisation itself.** This assessment examines the frontline services that the organisation provides and ensures that the service will meet the needs of victims. This makes it completely victim focused.

**56. Organisations which decide to abide by the Supporting Justice standards will be granted the Victims Choice Quality Mark<sup>30</sup>.** Users expressed interest and seem to appreciate this process as they are assured that services are consistent even if they are located in different places and delivered by different organisations<sup>31</sup>. Supporting Justice’s ambition is to make the mark a recognisable symbol of guaranteed excellence of service to victims and general public alike.

**57. The first quality Mark has been awarded in January 2018 to Derbyshire Victim Services<sup>32</sup>.** The award was made after Supporting Justice looked at the assessment (including a review of policies and other documentation) and conducted a site visit to speak to staff, volunteers and victims.

### 2.3.5 France Victimes standards

**58. For France Victimes, the French network of 130 victim support organisations, which provide services to victims of crimes across the entire territory under the sovereignty of the Republic of France, compliance with standards is a condition for membership.** To become a member of France Victimes, an organisation needs to apply and demonstrate compliance with several requirements. These include, first and foremost, abiding with ethical and deontological frameworks that reflect the values of victim support services and provide guidance on the assistance to victims,<sup>33</sup> and a commitment to the Charter of victim support services<sup>34</sup>. These two main documents define victim support, mediation and the framework for victim support, employment of staff and operational relations between France Victimes and its member associations.

<sup>30</sup> For more details on standards please see: <http://supportingjustice.org.uk/quality-mark/process/>

<sup>31</sup> Information received during interview with Supporting Justice.

<sup>32</sup> The first Quality Mark has been awarded, Victim Choice UK, 11 January 2018, <https://victimschoice.org.uk/articles/view/14>

<sup>33</sup> Services d’aide aux victimes, Code de déontologie, France Victimes, available at: <http://www.france-victimes.fr/index.php/docman/grand-public/26-code-de-deontologie-inavem> (in French)

<sup>34</sup> Charte des services d’aides aux victimes et de médiation, France Victimes, available at: <http://www.france-victimes.fr/index.php/docman/grand-public/fv-vie-interne/1588-charte-avinavem/file> (in French)



**59. To be a member of France Victimes, an organisation must:**

- Allow the effective reception of any person who considers themselves a victim of crime;
- Offer information about victims' rights;
- Provide victims with psychological support which can include material or financial assistance, accommodation, assistance in dealing with social organisations, administrations, insurance companies, banks etc.;
- Provide support which can include material or financial assistance, accommodation, assistance in dealing with social organisations, administrations, insurance companies, banks etc.,
- Have in place a referral system to ensure victims are redirected to specialised services, if needed.

**60.** The entire process of becoming a member of France Victimes takes up to two years, and includes a set of verification procedures, including a site visit to the applicant-organisation to verify compliance with standards. In cases of failure to respect France Victimes' rules, a process for the expulsion from the membership can be initiated by the Board. Before this procedure is initiated, the President of the association in question is invited to discuss the situation with the Board of Directors.

**61. France Victimes is the official partner of the French government in many victim related initiatives.** Being a member of the France Victimes Federation means access not only to national funding but also engaging with the government in its response mechanisms and policy development. Member organisations will be involved in the official response to instances of mass-victimisation, such as terrorist attacks, and will have access to funding which is budgeted through prosecutors' offices at the regional level to ensure victim support services via non-governmental providers. This added value is important in two ways: on the one hand membership of France Victimes motivates organisations to comply with standards in order to remain a part of the system; on the other hand, the government may rely on member organisations to provide quality services, involve them in response mechanisms, and provide funding with fewer formalities.

**62. The French approach relies heavily on the relationship of mutual trust and respect between the government, France Victimes and its members.** A similar system may also be built up through cooperation and good planning in Serbia. It would, however, require the consensus of stakeholders as trust needs to be engrained in any similar initiative.

### **2.3.6 Weisser Ring standards**

**63.** Weisser Ring is the nationwide victim support organisation in Germany, maintaining a network of more than 3000 volunteer victims' support workers in more than 400 field offices. Victim support workers provide one-to-one assistance in a voluntary and professional capacity. In 2012, three working groups composed of branch officers, regional chairperson and members and employees of the national headquarters jointly developed standards for victim support.

**64. As Weisser Ring relies on volunteers, the organisation felt the need to 'professionalise' its work through minimum standards.** The standards were developed to guarantee victims an equal service regardless of the location of the local branch where the victim may seek support or

information. The standards are binding for the entire organisation regardless of local and individual circumstances.

**65. The Weisser Ring standards<sup>35</sup> apply to the individuals providing the service and not to the organisation in itself.** The volunteers are expected to abide by the standards set by Weisser Ring: they must accept training on different aspects of victim support and are expected to maintain their commitment to these standards throughout their time with the organisation.

**66. A complaints procedure may be introduced by a victim or another volunteer, which triggers involvement of an external mediator<sup>36</sup>.** This allows Weisser Ring's main office to be aware of any misconduct or non-compliance with the standards by any volunteers or heads of local branches. If a serious breach is reported, the Federal office can take the decision to end the volunteer's engagement with the organisation.

**67. Volunteers receive additional training every few years to ensure they understand and apply the standards correctly.** It is the responsibility of the branch office leaders to ensure that the work of its volunteers is of high standard, and this makes it a part of their professional duties and is viewed as a part of their general performance appraisal.

**68. The Weisser Ring standards can be applied to voluntary and professional staff in combination with organisational standards.** When it is important to build trust into a new approach to victim support service, it might be important to consider introducing a set of standards similar to these, to ensure commitment and personal engagement of all individuals involved in the provision of victim support.

## 2.4 Serbian experience in standardisation

**69. Setting standards for service providers is not a complete novelty in Serbia.** Although learning from comparative practice is valuable for Serbian authorities, it is important to identify already existing good national practices. Recently, the Serbian Government has intensified activities regarding standardisation of social services, as laid out in the government regulations on conditions and standards for the provision of social protection services<sup>37</sup>. Standards are applicable to all social services, and compliance is required as a precondition for being licensed to provide any of the services deemed to fall under the category of social services.

**70. These standards contain a set of general requirements, which are applicable to all services and all service providers.** However, in addition to these general requirements, the social service standards provide for a number of specific conditions, which are required for the provision of certain type of services – e.g. services of personal support, institutional care etc. The service provider needs to comply with all the standards to be licensed to provide a certain set of services. A license, once

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<sup>35</sup> See the full Weisser Ring Victim Support Standards here: [https://weisser-ring.de/sites/default/files/domains/weisser\\_ring\\_dev/downloads/broschuerestandardsfuerdieopferhilfe.pdf](https://weisser-ring.de/sites/default/files/domains/weisser_ring_dev/downloads/broschuerestandardsfuerdieopferhilfe.pdf)

<sup>36</sup> Information received during an interview with Weisser Ring.

<sup>37</sup> Pravilnik o bližim uslovima i standardima za pružanje usluga socijalne zaštite, Official Gazette 42/2013

issued, is valid for a limited period of time, after the expiry of which the service provider needs to prove that they are still compliant to be granted an extension of licence.

**71. Social services' standards are divided into two main groups: structural and functional standards.** The former group defines necessary resources to be able to provide services (infrastructure, human resources), while the latter give guidance regarding the quality and quantity of professional procedures.

**72. Social services' standards are applicable to all providers of all social services, which also includes some services to some victims of crimes.** This includes shelters for victims of family violence and national helplines for those victims. These standards are commendable those specific services.

**73.** While social services' standards may be adequate for some forms of specific assistance provided to victims, these standards do not fully respond to the need for overall standardisation of victim support. Their shortcomings are reflected in the following points:

- Some victim support does fall within the category of social services, however, this overlap does not mean that the totality of victim support falls under the category of social services, as they are defined in Serbia. Generalist victim support is made available to all victims of all crimes, regardless of their social needs or potential categorisation as vulnerable for the purposes of social protection;
- While social services are focused on vulnerable social groups, generic victim support, which is required by the EU Victims' Rights Directive, should provide a complete support system to victims to help them recover from their trauma by allowing them to access the criminal justice system, if required. Victims' needs will be inherently interrelated with the justice and law enforcement sectors. Therefore, a solution should be found to ensure that victim support services are established and made operational within this context. Nonetheless, where they are applicable, social services' standards are indeed needed and useful for the provision of appropriate services for victims. Take for example, the provision of shelter for victims of violence: it is necessary to make sure, by means of these standards, that victims are provided with sufficient space and required minimum levels of comfort throughout this difficult period of their lives, while at the same time also providing them with sufficient support and protection.

## 2.5 Verification of compliance with standards

**75.** The analysis of comparative standard systems indicates that not only that the content of standards will vary depending on the objectives and aims of such standards, but also that the implementation of standards may be ensured through different mechanisms. Most systems rely on some form of control, either to enter a system, to stay in the system, or a combination of both, with different approaches to verification of compliance and accreditation of organisations. The choice of which framework to use depends on the nature of the organisation, on the purpose of the accreditation, and on the context in which the assessed organisation operates.

**76.** Three most common approaches to verification of compliance that were identified may be summarised as: self-verification, verification by the same body that had introduced the standards and verification by an independent third party. These models differ in the relationship between the standard and its verifying body: different levels of objectivity may be found in each option.

Additionally, each model varies by administrative and financial burdens that may be imposed during the accreditation process.

**77. The three methods presented below will often also come at a different cost to the service provider or the certifying body.** This cost may be the important factor when deciding which approach to take; especially in an environment in which victim support providers are struggling to provide better quality of services to as many victims as possible on very limited budgets.

**78. It may be important to appoint a victims' commissioner to ensure compliance.** This position exists already in a number of countries, and has helped ensure that victims' rights are fully respected and that the quality of services they receive remains at a high level. Ensuring compliance with standards, of course, will not be its sole responsibility, but can be a major part of the appointment: through supervision of the accreditation process or in the role of ombudsperson.

### 2.5.1 Self-verification

**79.** Self-verification is based on a set of internal standards adopted by an organisation to ensure it meets a level of quality in the services it provides. Setting internal organisational standards is the least costly of verification methods but is completely subjective and it may be difficult to reassure users and stakeholders that the standards indeed ensure the quality of service. This method may be used by smaller structures lacking sufficient resources to engage in a full accreditation process. Self-verification can be carried out through human resources management: annual staff appraisals; satisfaction questionnaires for clients; continuous on-the-job staff training, etc. Prior to ISO accreditation, APAV carried out self-assessment of its own internal management standards.

**80.** To claim compliance with internal standards, an organisation can display its objectives on its website and in its publications: to demonstrate how its services conform to the declared standards; and to advertise a grievance procedure for any unhappy with the service provided. Standards may stimulate members of the organisation to attain a certain level of quality within one or more areas of their scope of activity.

### 2.5.2 Verification by the standardising body

**81. A common approach to standards is verification of compliance by the body which imposes the standards.** This is the case with VSE, France Victimes, the Marianne Charter and Weisser Ring: while the processes existing in each of these organisations vary, they have some common features.

**82.** Each verification systems observed involved the following: self-assessment, site visit, reporting or scoring, and accreditation or certification.

**83.** Self-assessment is a process through which the 'candidate organisation' verifies if their existing practices are in accordance with the established standards before the verifying body is invited to verify compliance. The verifying body may provide a questionnaire to this effect, which will then be submitted to the accrediting body. As a part of this process, the verifying or accrediting body may ask for relevant documentation that supports the answers provided. The accrediting body will review the answers and, if needed, ask for additional documentation and/or information.

**84.** Site visits provide the accrediting body with the opportunity to audit compliance before deciding on the outcome of the verification process. Site visits allow the verifying body to assess factors that could not have been adequately described in the self-assessment process. During the site visit the review team may:

- Verify the information provided in the self-assessment
- Investigate issues identified during self-assessment.
- Interview staff and volunteers
- Review promotional and display materials.
- Visit key facilities.
- Share suggestions for improvements or exchange best practices.

**85.** Site visits will be usually followed by a report, which may contain a numeric or descriptive score of the organisation being verified for compliance with standards.

- **Reporting:** The written site visit report embodies a review of the victim support provider, and serves as the basis for accreditation decisions. The report also guides the accrediting body in determining the degree of the victim support provider's compliance with the standards. The site visit report can include: recommendations of the site visitors with supporting documentation, recommendation for accreditation status. It can also provide information to be included in the letter notifying the victim support provider about the results.
- **Scoring:** Following all of the evidence gathering, the information is reviewed and marked according to a scoring matrix which identifies whether the criteria for each standard have been met.

**86.** **Accreditation or certification will be the expected outcome of the verification procedure, where the service provider will be provided by a seal of approval (Marianne Charter or Supporting Justice), the right to invoke a certain set of standards in their references (ISO, VSE) or simply the right to provide a certain service (Serbian standards for social services).** Accreditation will normally come after the service provider has satisfied the verifying body that it meets all the requirements to be granted accreditation of certification.

**87.** **Such a process of accreditation is commonly practiced by both governmental and non-governmental standard systems.** It is practiced by VSE and Supporting Justice, as non-governmental bodies, the former an association, the latter a company, but it is also practiced by the Serbian government in case of social services' standards.

### **2.5.3 Verification by an independent third party**

**88.** The process of verification by a third party is in itself quite similar to the verification by the standardising body, however the significant difference is in the neutrality of the adjudicator. The existence of an external certifying authority gives additional assurances that compliance with standards will be applied in a non-biased and professional manner. This way the certifying organisation delegates the process of verification to a trustworthy third party, hence avoiding to have to put into place resources for the verification process which may be extensive and resource consuming.

**89. The independent third party may be a private or public entity.** Usually, private entities are engaged for commercial standards – for example, ISO standards can only be verified by independent private third party, as ISO itself does not provide certification. This is performed by external certification bodies, who use another ISO standard – CASCO<sup>38</sup> in the process of certification of compliance. Marianne standards are also verified by private entities, rather than by the French government<sup>39</sup>.

**90.** In some countries, the institution of victims’ ombudsperson or victims’ commissioner is introduced to ensure respect for victims’ rights in general, and may be entrusted with certification of victim support providers, as a part of their competence. There is a growing number of such bodies globally, from Canada and some US States to the UK’s Victim Commissioner and the Portuguese Commission for the Protection of Victims of Crimes.

**91.** Even when not entrusted with certifying compliance with a specific set of standards by victim service providers, these institutions generally are always in a position to receive complaints from victims. A victims’ commissioner or ombudsperson can ensure that services are provided in accordance with expectations of high quality service.

**92. Independent third party may also be an individual.** The Audit and Risk Committee (ARC) of Victims and Survivors in Northern Ireland is one such example. The ARC members and chair are appointed by the Board. However, the Chair is independent and is not a member of the VSS Board. The ARC’s terms of reference set out its purpose as being to support the Interim Accounting Officer in monitoring risk, control and governance systems (including financial reporting). Additionally, the ARC will advise the Board and the Accounting Officer on the adequacy of audit arrangements (internal and external) and on the implications of assurances provided in respect of risk and control<sup>40</sup>.

**93.** Verification of compliance by an independent institution can be expected to be recognised on a broader level than self-verification, or even verification by a standardising body. It is to be expected that an external verification would be more objective and neutral, especially if entrusted to a professional verification body – either a private entity (e.g. verification of Marianne standards by a number of private companies approved by the government) or by an independent public institution (e.g. victims’ commissioner).

## 2.6 Approach proposed for Serbia

**94. Each of the standardisation systems has its benefits and shortcomings.** The strict governmental control (such as the Marianne system) may be costly and prohibitive for organisations to comply with, in particular small NGOs working under pressure with limited resources and uncertain funding. Self-certification systems, on the other hand, rely heavily on trust, which can only come as a consequence of years of successful cooperation and proven reliability of partners: this cannot realistically be expected in Serbia.

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<sup>38</sup> See ISO/CASCO, available at: <https://www.iso.org/committee/54998/x/catalogue/p/1/u/0/w/0/d/0>

<sup>39</sup> The four certifying bodies are Afnor, LNE, Bureau Veritas and Lloyd’ Register LRQA.

<sup>40</sup> See Victims and Survivors Service, *Audit and Risk Committee*, available at: <http://www.victimsservice.org/about-us/audit-and-risk-committee/>.

**95.** As a minimum guarantee of conformity, the future Serbian system of quality standards for victim support services needs to ensure an independent and unbiased verification of compliance with standards. The approach will depend on many factors, including the time and resources available, as well as the circumstances and context within which standards will be introduced.

**96. The initial approach could be seen in a creation of a joint body (a commission, working group or similar) consisting of NGOs and governmental actors.** This option could be cost-effective and participatory, even though it would require coordination and dedication on the part of participants. It would, furthermore, come with the risk of having to limit the number of participants at the expense of full representation and proportionate participation, risking criticism for bias and lack of objectivity. The Serbian government might consider this option as a first step in the development of standards for victim support services, ensuring a proportionate representation and participation of relevant stakeholders. An effective system would consist of both NGOs and governmental actors.

**97. Alternatively, standardisation could be ensured through a requirement of external verification by a professional institution (e.g. a company or through some forms of ISO compliance).** This approach might prove to be neutral and unbiased, however its cost might present an insurmountable burden, if transferred to organisations themselves. The aim of introducing standards is to maintain a certain level of quality for users, Serbian organisations should not bear too much of the burden if the system is operated by an external body. This system might not be of relevance to the Serbian approach.

**98.** Finally, in the longer term, the appointment of an independent body in charge of the broader issues of victims' rights might be seen as an appropriate instance for ensuring standardised quality for victim support services. The appointment of a victims' commissioner might be relevant in this sense, to guarantee objectivity, impartiality and independence regarding standards applied to support services in Serbia, in its broader role of promoting the interests of victims and witnesses and encouraging good practice in their treatment.

## **2.7 Benefits of standards systems and consequences for non-compliance**

**99. Introducing a system of standards and their verification and consequent accreditation comes with a number of benefits.** These benefits include: better services for victims, including coordination and referral, increased trust into services and facilitated access to funding for service providers.

**100. Each set of standards victim support services achieve a better service for victims.** Compliance with service standards will push organisations to improve their office spaces, reduce waiting times, and improve their management procedures. As a result, personnel will respond better to victims' needs and support will be provided in a more efficient manner. Certifying an organisation for its compliance with standards will increase the trust of victims, who see that the service provider makes an effort to ensure quality through standardisation of services.

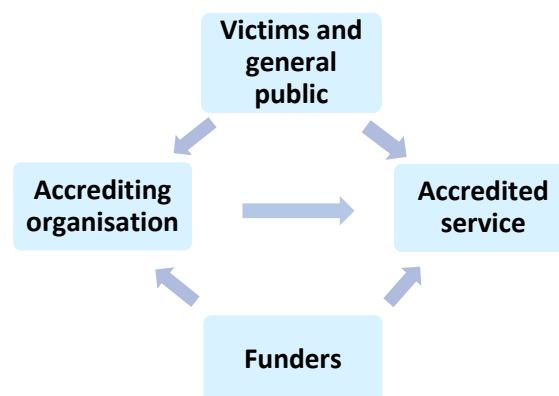
**101. Certifying an organisation for its compliance with standards facilitates referral.** This may be particularly relevant for Serbia, with its patchwork of providers, but is also important in environments

where there is more uniformity in approach. For example, when referring a victim to facility where the support is appropriate for her/his needs, it requires confidence on the part of the referring body that the service provided will be of a required standard of quality. Such confidence can easily be gained through thorough a system which enables an easy verification of an organisation's references.

**102. Certification may also facilitate funding.** Accreditation may be a pre-requisite to access some funding streams, while others may base decisions on the adherence of the organisation to a certain sets of standards. For example, members of France Victimes have access to funding based on their membership in the Federation.

**103. The relationship of trust instilled in a system of standardisation needs to be triangulated between the victim, the service provider and standardising authority to ensure that the system and certification is results oriented.** The victim needs to trust both the accrediting, and the accredited, organisation or authority. The service provider needs to have confidence in the process and conditions of accreditation and its related benefits. The accrediting organisation needs to be assured that victims are receiving appropriate quality care and to trust that only those organisations that are genuinely dedicated to providing quality support to victims of crimes are indeed given accreditation.

Figure 11: Trust relation between victims and general public, accrediting organisation, funders and accredited service.

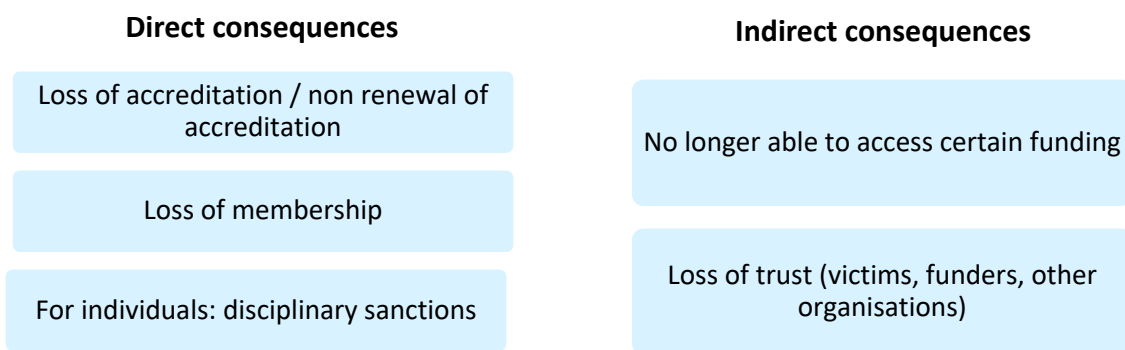


**104. Obtaining and maintaining accreditation should mean 'benefits' to compliant organisations.** Obviously, the main benefit is the ability to provide better services. But further than that – holding an accreditation should entail further advantages. For example, accredited organisations may be: considered automatically eligible for certain funding streams; given mid to long-term framework contracts which will ensure their sustainability, dependant on their continued compliance; given advantage in certain partnerships; given access to certain lines of restricted training opportunities (e.g. providers of legal aid may be given access to courses provided by the Judicial Academy or Bar Association, psychologists may be given access to forms of clinical work related to their work with victims etc.); granted advantageous conditions to access other activities (e.g. be considered as trusted partners who can provide training for law enforcement, judiciary or other professionals, can be invited to provide support to schools, or can be recommended to provide commercial services, such as support provided through insurance or transport companies).



**105. When accreditation is granted, the organisation should continuously check its conformity with standards.** Most of the systems studied for this report allow victims or users to file complaints if they feel the delivery of service was not in line with expectations. If there is a serious breach in the implementation of standards, the accrediting body may impose penalties on the organisation, including the removal of accreditation.

Figure 12: Direct and indirect consequences for non-compliance with standards



**106. An accreditation could become an administrative burden, instead it should support victim service providers to improve their services.** The aim of standardisation is to improve the quality of delivery and not to administratively burden service providers, with already limited resources. The process should lead organisations to improve their internal procedures and how they provide services, to the overall benefit of victims, funders, policy makers and the general public.

**107. In the case of non-compliance with standards, the loss of accreditation should be the last resort.** The accrediting body should help the organisation to identify the gaps and help it improve its efforts to offer a service of quality to the users.

**Interview with Brottsofferjouren (Victim Support Sweden)**

“National boards may ultimately exclude a local support centre (member organisation) if they are in blatant disregard of the statutes and minimum requirements. Being excluded from Brottsofferjouren is the utmost consequence of non-compliance. National boards are bound by a responsibility to do everything in their power to provide help and guidance to a local support centre so they can become compliant and exclusion will be unnecessary.”

### 3 RECOMMENDATION OF STANDARDS FOR VICTIM SUPPORT SERVICES IN SERBIA

**108.** The standards proposed in this report are based on the comparative examples as well as Serbian needs and have been broadly discussed with Serbian stakeholders. They represent common features of quality standards already existing in other systems in different countries and organisations.

**109. Compliance with standards should not present obstacles to their delivery.** While these standards are important steps towards good quality services in Serbia, and signing up to such standards is necessary to achieve compliance with the Victims' Rights Directive, organisations should be supported and guided towards compliance rather than overwhelmed by an additional administrative burden which will restrict further development of victim support services in Serbia.

**110.** Guidelines support the improvement of programs and are not intended to confine practical support by imposing rigid rules and boundaries. The standards proposed are guidelines for promoting competence, consistency and quality of victim support services and not an obstacle in setting up a support service.

**111. It is important to recall that standards need to be ambitious, yet realistic.** The bar should not be set too high, to discourage organisations from complying, yet standards need to assure a certain level of quality of services and instil responsibility in service providers to ensure this quality. However, standards should not impose unrealistic and unjust administrative or financial burdens on the organisation in order to comply. Standards should be accepted and seen as valuable by different stakeholders from policy makers to NGOs and judiciary. It is important to note that the objective is not to exclude non-compliant organisations, but rather to help them raise their standards.

**112.** Further guidance documents for the implementation of standards such as human resource policies, volunteering policies, and child protection policies can found in the annex of the report. Annex 1 of the report gives a check list of indicators for compliance with each standard. The 8 proposed standards represent a proposal for standards for services delivered, people working with victims and the premises where the service is provided.

Figure 13: Standards proposed for Serbia

1. Services are available without discrimination	2. Respect the dignity, rights, needs and feelings of the victim	3. Ensuring the confidentiality and privacy of the victim	4. Ensure the safety and security of victims and service providers
5. Provide a variety of support options	6. Provide quality control through the monitoring and evaluation of service provision	7. Provide adequate and appropriate training for all staff and volunteers working with victims	8. Services are provided by staff and volunteers

### 3.1 Standard 1 – Services are available without discrimination

**113.** This standard is highlighted as it will be applied in different ways to generalist and specialist services for victims, in terms of who can access the service. All other features of this standard, as well as the rest of the remaining standards, remain applicable equally to all providers of victim support services.

**114.** Application of this standard to all victims, without differing between them, can be considered as the first condition to the establishment of any victim support services which claims to be generalist in nature. Specialist services – those for only certain groups of victims (e.g. minorities – for example Roma, persons with disabilities or women) as well as those for victims of certain crimes (e.g. victims of domestic violence or human trafficking) or any combination of these factors (e.g. victims of hate crime, women victims of domestic violence etc.) are still very much needed for their specialist knowledge and their ability to provide tailored services to victims with specific vulnerabilities and needs. Even when specifically focusing on a certain group of victims, victim support organisations must not decline to assist to a member of such group of victims on the basis of age, gender, sexual orientation, race, religious belief, political opinions, culture, disability, the nature of his/her complaint or for any other reason, unless specified in their constitutions.

**115.** Regardless of the existence of specialist services, there is an obligation on the generic victim support services to respect specific vulnerabilities of all victims. Recitals 14 to 17 of the Victims' Directive expressly mention particular groups of victims that can be considered more vulnerable and, therefore, who need special attention, support and protection due to the particular nature of the crimes committed against them. These groups are: children, victims with disabilities, victims of terrorism and victims of gender-based violence. There is a legal obligation for States to ensure a support system, which is sensitive to the needs of these groups of victims. Obviously, the list is not exhaustive, and sensitivity needs to exist in relation to other vulnerable groups.

**116. Accessibility needs to be ensured in practice for all victims.** Premises need to be placed in safe neighbourhoods, with easy access to public transport. Websites and written materials need to be written in a non-technical, plain language, so as to be easily understood by people who do not have technical, legal or medical knowledge. Premises should be pleasant in terms of ambience and temperature, and staff should be friendly and responsive to all.

**117. Accessibility for persons with disabilities is an international legal obligation, stemming from Article 9 of the UN Convention on the Rights of Persons with Disabilities.** Requirement for accessibility is most notable in relation to victims with disabilities. The blind and visually impaired victims will have specific requirements when receiving support. It might be

In their General Comment on Article 9 of the UN Convention on the Rights of Persons with Disabilities, the UN CRPD Committee describes in more detail how States should comply with the requirement for accessibility.

important, for example, to ensure access to premises not only for the victims, but for guide dogs too. Documents should also be available in braille and a text-to-speech facility should be available for electronic correspondence, when communicating with victims with such specific needs. For the deaf and hard of hearing – sign language should certainly be a part of the solution, however, not all persons belonging to this group know and use standardised sign language. The presence of support staff, use of written notes, or use of pictograms might be advisable in this regard. It is also important to remember the accessibility of services for victims with psychosocial and intellectual disabilities – the environment in the premises should also be prepared in view of the needs of this group (avoiding sensory irritations by light or noise, for example) and any written materials need to factor in the needs of people with intellectual disabilities – the preparation and use of easy to read materials is advised. Similarly, pictograms can also be used in communication with people with intellectual disabilities. While minimum accessibility requirements need to be ensured, cooperation with specialist organisations and/or referral mechanisms can also be utilised, given the constraints within which most support organisations function in Serbia.

**118. Accessibility requirements may be quite specific and overwhelming.** They can also require a significant budget to fully meet all possibilities at all times. Much can be obtained through cooperation, and creating synergies, with specialist organisations, as for victims with other specific vulnerabilities. Coordination and referral will play an important role in ensuring full accessibility for victims with multiple requirements.

#### **How is this standard ensured in other systems?**

**VSE Standard 1** “Making our services accessible to victims of all types of crime”

**Supporting Justice UK** “Victims know where to get help and find it easy to access”

**Marianne Commitment 5** “We facilitate access to procedures for people with disabilities”

**Marianne Commitment 6** “We welcome people in difficulty”

## 3.2 Standard 2 – Respect the dignity, rights, needs and feelings of the victim

**119. It is essential to ensure that the staff and volunteers treat victims with respect and dignity.** Respect and recognition represent basic needs of all victims and, as such, need to dominate the entire victim support services system. Victims need to feel that their suffering is recognised and sympathised with. They need to be respected, regardless of who they are and what type of crime they were subject to. Any form of secondary victimisation in victim support services should be unacceptable and avoided at all cost. The objective of this standard is to make sure that all victims are treated equally in a manner respectful to their dignity, rights, needs and feelings.

**120. From the very first contact, whether by email, phone, social media or face-to-face, staff members and volunteers need to ensure that victims are treated with courtesy, politeness and kindness.** Language used in any materials and when speaking to victims should be easy to understand and clear. Communications should be non-judgmental, take into account gender, cultural, religious and other sensitivities as well as the sensitivities of different types of victims (based on the crime).

**121. Giving clear information about service procedures, making clear to victims what to expect, informing them when an appointment has to be cancelled or delayed, listening to victims' requests and responding to them, are all methods of ensuring victims are treated with respect.**

**122. An important aspect of treating victims with respect is listening to them, giving them an opportunity to voice concerns or complaints, and then acting on those complaints.** A complaint procedure should be in place within the organisation to allow for this process and victims should be informed about it. The process for submitting a complaint and acting on it should be transparent and clear to both victims and the organisation's personnel.

**How is this standard ensured in other systems?**

**VSE Standard 2** "Respecting victims and treating them with courtesy and dignity."

**Supporting Justice UK** "Victims feel they have a voice and are treated with empathy and respect"

## 3.3 Standard 3 – Ensuring the confidentiality and privacy of the victim

**123. Article 8 of the Victims' Directive states "Member States shall ensure that victims, in accordance with their needs, have access to confidential victim support services (...)"**. Victim support services are therefore bound by confidentiality. The communication of information can only be carried out with the consent of the victim. It is crucial that all personal information, received from the victim, a witness or a family member, remain confidential.

**124. Victim support services need to comply with the EU legislation on data collection and protection<sup>41</sup>.** The General Data Protection Regulation (GDPR) aims at strengthening and unifying data protection law in the digital age. Any organisation processing or controlling data in the EU must comply with the legislation. This can be ensured by adopting a data protection and collection policy.

**125. Meeting confidentiality requirements also includes ensuring that victims understand both the commitment to maintain confidentiality and the limitations of that commitment.** Limitations include conflicts between a duty of care and support to the victim, and the duty to maintain privacy and respect confidentiality. For example, if there are concerns that a victim might hurt him/herself, or pose a threat to another individual or group, or that someone else poses a threat to a victim, confidentiality might need to be broken to ensure the safety of those concerned.

**126. Ensuring confidentiality will mean that premises of the support organisation allow for victims' privacy, regardless of whether they are contacting the service in person, by phone or through a chatroom.** Any interview or other contact with the victim must ensure victims' privacy and support provider's full attention to the victim and their needs at the moment. In practice, this might mean that there is a separate room for interviewing victims in person or on the phone. For example, when APAV decided to introduce the 116006 helpline, they were obliged to ensure a separate room to be able to provide service to victims without disruptions and disturbances.

**127. This standard is essential to ensure that a relationship of trust is in place between the victim and the support provider, as an essential condition for an effective service, able to respond adequately to victims' needs.**

#### **How is this standard ensured in other systems?**

**Article 6 Code of Deontology, France Victimes** "Victim support services are bound by confidentiality. The communication of information can only be done with the consent of the victim"

**Victim support standards of Weisser Ring** "We talk to victims confidentially on the phone or in person"

### **3.4 Standard 4 – Ensure the safety and security of victims and service providers**

**128. This standard is essential to ensure that victims feel safe and secure when they seek information, advice or support from a victim support service.** It is emphasised in the Victims' Rights Directive, which highlights that "Measures should be available to protect the safety and dignity of

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<sup>41</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC

victims and their family members from secondary and repeat victimisation, from intimidation and from retaliation, such as interim injunctions or protection or restraining orders”.

**Intake process** is different from individual assessment and the two should not be confused. In the intake process, victim support providers ensure that the victim is well received and made comfortable to receive support. During the intake process, the support worker will ensure that the victim understands how the support system works, what types of support they can receive and in what manner. Individual assessment is a procedure that requires more detailed approach, and sometimes happens over several appointments. It is reserved for victims at high risk and is usually conducted by law enforcement.

**129. An individual risk assessment procedure can be put in place to identify the nature of the risk, the extent of the risk and the likelihood of the risk to happen.** In the first contact with a victim, it is important to identify any ongoing risks for the victim. This can be done during the intake process by going through an assessment questionnaire.

**130. Depending on the nature of the risk, the organisation may not be equipped to deal with it.** In these circumstances, it may be necessary to refer the victim to another organisation. It is therefore very important to build, in advance, a network with different organisations and to develop relations with those organisations, for example, by meeting on a regular basis. Weisser Ring ensures this standard by working closely with psychological, psychotherapeutic

and medical support structures to which they can refer victims.

**131. Victims’ and support workers’ physical safety should be ensured at the premises.** Access to offices should be secured – by intercom, or other means, and limited only to genuine visitors, preventing potential abusers from following the victim to the victim support service. Any situation risking victims’ or support workers’ security should be avoided, or if inevitable, measures should be taken to ensure the safety of all concerned (e.g. by having separate entrances for victims and perpetrators, scheduling different arrival times: unbeknownst to the perpetrator scheduling the victim to come a bit later or earlier, informing the police, or hiring private security officers).

**132. Safety for victims needs to be ensured with other types of services.** For example, for phone calls with the victim, safe times for calls should be established or victims can be given a code word for when they cannot talk or are in danger. For online services, it is important to ensure there is an “exit button” on the service website. By clicking on the button, the page automatically disappears and is transferred to a blank Google page. With this option, a victim who is in an unsafe environment, who is watched, spied on or threatened by the offender can access the relevant information on the website and quit the page in a click if she or he feels in danger. This method is used on many victim support services websites (VSE, Victim Support Scotland, Victim Support Service South Australia, Victim Support Sweden, Victim Support Finland).

**133. Use of full names in communication of both victims and support workers should be carefully considered.** For example, in Victim Support Finland, support workers only use their first names in their communication with the victim. This measure was introduced to ensure their personal safety.

**134. It is advisable to discuss with the victim how accidental encounters in the street should be handled.** Both support worker and the victim need to feel comfortable and know what to expect when

they meet each other in the street. It is important to set the ground rules for such encounter between the two.

#### **How is this standard ensured in other systems?**

**VSE Standard 3** “Working to ensure victims are safe.”

**Supporting Justice UK** “Victims feels safe and steps are taken to ensure this”

Victim and Survivor Service Northern Ireland: “We put clients first” and “We take steps to ensure that VSS Staff work in a safe environment that protects their wellbeing.”

### **3.5 Standard 5 – Provide a variety of support options**

**135. It is important for victims to be able to contact victim support services in a range of different manners.** This will depend on their needs, their geographical location, their knowledge of IT tools, mobile technologies and social media, age, disability and other factors. Communication habits are very much a generational issue, and victim support services should be made available in a different range of ways, ensuring that all victims, from all generations, all regions and with different accessibility needs can access services in a manner that is most convenient for them.

**136. The most common distinction between ways to provide support is in-person and distance support.** In person support may be provided through victims being seen in the victim service office, setting up a mobile team, which will have fixed weekly or monthly schedules at different locations or go to victims’ home or workplace, church or school, to provide support on the spot. There are successful examples of some services which are left completely flexible, such as the personal ombudsperson in Sweden, where the support officer does not have an office at all, and is fully committed to be wherever the clients need her/him to be<sup>42</sup>.

**137. When the service has an established office, opening hours need to be clearly set and adhered to.** A volunteer or staff member will meet the victim to provide any information required and make a further appointment if necessary. This gives the victim a chance to have a confidential conversation in a peaceful and neutral environment.

**138. Some services also propose mobile teams where staff members or volunteers will go and meet victims in other locations.** This can be done in public spaces, at the victim’s home, etc. This can be very useful for victims in remote areas, victims with disabilities, or victims who are too afraid to go to an office. Schedules for mobile services need to be set up. If there are regular mobile services offered to provide permanence of service to remote regions, again, the schedule and location needs to be known in advance and the schedule must be respected. Visits to victims’ homes need to be

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<sup>42</sup> Personal ombudsperson (or representative) is an innovative approach to supporting persons with psycho-social and intellectual disabilities. It was introduced in Sweden in 2000 and has been successfully providing support since. See more at: <http://www.right-to-decide.eu/2014/08/swedish-personal-ombudsman-service-po-for-people-with-mental-health-problems/>.



conducted in a way as to respect the victims' desires for privacy and dignity, and bearing in mind the victims' and service providers' safety.

**139. Distance support, thanks to ever developing technologies, can be provided in a growing number of ways.** The first step is to have a website with all the relevant information a victim could seek (useful addresses and phone numbers, emails, the rights of the victim, what to do in case of victimisation, how to access justice etc.). This website should be easy to find through search engines and victims should be able to access this website on any electronic devices (computer, smartphone, tablet computer). A generic email address and phone number for the service should be easy to find on the page.

**140. Further distance support can be done using a whole range of other manners.** It can be done through phone, chat, WhatsApp, Viber, Telegram. Victim support services should be available from the earliest possible opportunity regardless of whether the crime has been reported. The most common way to provide prompt support and information to victims is through a helpline. The 116 helplines are a range of easy-to-remember and free-of-charge phone numbers to assist children and adults in need across the European Union<sup>43</sup>. The European Commission has reserved five short numbers with a single format 116 + 3 digits for helplines that should be accessible across Europe. The 116006 Helpline is the dedicated number for victims of crime. The service enables victims of crime to get support, to be informed of their rights and how to claim their rights, and to be referred to the relevant organisations<sup>44</sup>.

**141. Each organisation will need to decide which support methods they want to focus on.** However, a combination of a face to face service and a remote service can help to spread the organisation's coverage whilst enabling many victims to receive quick, simple information without having to come to an office.

**142. Depending on how victim support services are organised, not all support organisations need to provide all forms of support.** Hence, if the support is provided by means of a NGO network, a centralised service or through a different formal or institutional arrangement, there needs to be sufficient coordination between participating entities to ensure that variety exists and that the optimum division of labour is put into place – either by specialising to provide certain types of support (e.g. only one organisation provides national helpline, while another provides support for some types of social networks or mobile apps), ensuring maximum different types of support in a certain region, or probably through the combination of the two.

**143. When providing services to victims, multiple referrals should be avoided at all cost.** For this reason, networking of victim support services, standardisation and growth of victim support organisations is essential. Coordination of different services needs to be ensured through protocols

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<sup>43</sup> <https://ec.europa.eu/digital-single-market/en/116-helplines>

<sup>44</sup> There are currently 10 victim support organisations (VSOs) operating the 116 006 in their Member State. All of the operators of 116 006 helplines are members of VSE – Weisser Ring (Germany), Weisser Ring (Austria), Croatian Victim and Witness Support Service (Croatia), Crime Victims Helpline (Ireland), Slachtofferhulp Nederland (The Netherlands), Bílý Kruh Bezpečí (Czech Republic), Offerrådgivningen i Danmark (Denmark), Rikosuhripäivystys (RIKU, Finland), France Victimes (France) and the Portuguese Association for Victim Support – APAV (Portugal), with the latest information indicating that Estonia will be the next country to introduce the 116006 helpline for victims of crimes.

and agreements in a standardised manner, to facilitate transfer of information and minimise the risk of revictimisation in the process of referral.

#### **How is this standard ensured in other systems?**

**VSE Standard 5** “Supporting victims through diverse services”

**Victim Support Standards Weisser Ring** “Victims of crime may reach WEISSER RING by contacting the branch office or calling the victim helpline”

### **3.6 Standard 6 – Provide quality control through the monitoring and evaluation of services provision**

**144. To make sure that quality is achieved and maintained, victim support services need to be subject to regular monitoring and evaluation.** Evaluation is a cornerstone of a quality service and should thus be part of the regular activities of a victim support organisation.

**145. Evaluation can be internal or external and will largely depend on, and can be conditioned by, the verification system for quality control that will be introduced in Serbia.** Internal evaluation can be carried out by assessment on the quality and satisfaction with services of employees by partners, the public, and victims. It can be carried out through quantitative assessment tools such as questionnaires or analysis of data or qualitative assessments such as interviews or focus groups. External evaluation refers to evaluation by an external evaluator who will be expected to develop a comprehensive methodology to look at the positive impact of an intervention and identify potential areas of improvement.

**146. As the primary beneficiary of any victim support service is the victim, evaluation should always include victims’ perspectives.** Strong ethical guidelines should be followed when including victims’ opinions in evaluation procedures since responses guided by social desirability, secondary victimisation or re-traumatisation should be avoided at all times.

**147. High quality services for victims of crime should include a complaint system as an integral part of their structure.** Again, this system will depend on the accreditation system and the introduction of any independent external bodies which, if introduced, should certainly be involved in the complaints response. Victims are coming to victim support services to receive high quality care and should have the opportunity to place a complaint about the support they received. A low threshold and qualitative complaint procedure builds on the following principles:

- **Victim-oriented:** a victim-oriented complaint procedure is key to protect the victim from secondary victimisation and further harm;
- **Visibility and accessibility:** this can be facilitated by making the complaints procedure easy to access and to understand. Victim support organisations should also raise awareness and provide information about how and where to complain;
- **Responsiveness:** the responsiveness of complaint procedures should ensure a victim’s complaint is acknowledged quickly, addressed with the least possible delay and that the victim is kept informed throughout the procedure;

- **Objectivity and fairness:** victims' complaints should be shown to be treated in an objective, equitable, unbiased;
- **Confidentiality:** Personal information related to complaints is kept confidential.

**148. The outcome of the complaints procedure should allow for potential remedy to the victim and should inform a constant improvement of the services.**

#### **How is this standard ensured in other systems?**

Victim Support Netherlands has two complaint procedures in place:

- **Internal procedure (for volunteers and paid staff):** complaints can be reported to an external entity. Complaints can be reviewed by an independent Board of Misconduct. Mediation is also an option.
- **External procedure:** complaints about the quality of the service or the conduct of an employee can be addressed to the Secretary of the Complaints Board. In the first instance the complaint will be handled by the team leader, regional manager, director or a member of the Executive Board. In the second instance, the complaint will be reviewed by the external Complain Board.

The complaints board is composed of 3 independent members: a judge of the Central Netherlands court, a lawyer and a relationship and family therapist.

**Marianne Charter Commitment 12** "We evaluate our practices, we involve our employees and we take into account their feedback to improve the quality of service"

### **3.7 Standard 7 – Provide adequate and appropriate training for all staff and volunteers who work with victims**

**149. Good services will only be provided by appropriately trained staff.** In order to ensure a service of the best quality possible to victims, all staff and volunteers working with or supporting victims of crime should receive a required level of training in accordance with the nature of their contact with the victim and the type of crimes involved.

**150.** Training should be adapted to the relevant needs of staff and volunteers as well as for their personal and professional development. Starting with induction or orientation training, staff development should be ongoing throughout their career in victim support.

**151.** Induction training may be provided on an *ad hoc basis*, whenever new staff member joins, or organised periodically, for a larger number incoming staff at certain intervals. For example, some organisations put in place induction training for all new staff and/or volunteers in their network: new staff from the entire network will gather at a single location and receive training in several sessions organised each year. Apart from skill development, this is an opportunity to encourage interaction between staff and volunteers from different services and locations, which can facilitate communication between different services and potential victim referral points. While this approach

may be easier to execute in large organisations, it is also practicable in networks or via shared resources.

**152. Ongoing training should be provided to all staff and volunteers.** It may be a part of the ongoing organisational plan, providing training to all staff regarding new developments (e.g. the introduction of a new phone line or a change in legislation or internal procedures, which affects everyone’s performance), or a personalised training plan, adjusted for each staff member. Ideally, a combination of the two approaches should be put into place.

**153. Training may be provided internally – by an organisation’s own staff sharing knowledge, or externally – by outsourcing training to external experts.** External training does not need to entail additional cost; it can be provided through exchange e.g. specialist organisations can provide training on certain specific forms of services or needs of certain groups of vulnerable victims. Organisations can apply for external funding for training through a number of funding programs (e.g. Erasmus+), or using the free online training resources, such as Coursera, Alison or others.

**154. Staying in touch with other organisations in the country, region and internationally may facilitate continuous learning.** It is fundamental to networks, such as VSE, to exchange best practices and provide training for its members. VSE, as other similar networks, organises regular conferences, workshops, consultations and creates other opportunities to learn from its members and to forward that knowledge to the rest of its membership. Regional exchanges are facilitated and staff twinning encouraged, to ensure that learning is ongoing. Joining VSE, or a similar network, may represent an advantage for any victim support organisation to ensure continuous learning for its staff and to use the opportunities for affordable or even free training.

**155. Whether the training is internally or externally provided, it is advisable to have three levels of training.** (1) In depth training for the staff who will work directly with victims and provide them with necessary resources to deliver their work well (this may include staff supervision); (2) a general training for staff who will not be working directly with victims, but might happen to be in touch with them (e.g. administrative or finance staff); (3) and an information or awareness raising training – for staff who will not be likely to work directly with victims (e.g. technical staff, IT etc.), but who might still need to understand the sensitivities of work that the organisation provides.

How is this standard ensured in other systems?

**VSE Standard 8** “Achieving quality through training.”

**Victim support standards Weisser Ring** “Our work is based on successful compulsory and voluntary ongoing training in order to stay abreast of the latest knowledge”

### 3.8 Standard 8 – Services are provided by staff and volunteers

**156. This standard is important to ensure that services are provided through a combination of professional staff and dedicated volunteers who have various levels of expertise.** Provision of victim support, in comparative practices, is dependent upon dedicated volunteers.

**157. Both staff and volunteers, apart from being trained to work with victims, in line with Standard 7, need to be hired through a transparent system based on their qualifications and experience, as well as the organisations' needs.** Volunteering services may be provided not only by individuals, but also through businesses. For example, many law firms will be ready to donate some of their *pro bono* efforts to victim support organisations. This can benefit victims themselves – through legal representation, or organisations as a whole – by providing them with advice and support in, for example, developing internal policies in line with national and international legal requirements.

**158. For at least some positions, specific requirements – not only in terms of professional qualifications and experience, but also regarding their personal attitudes and conduct, will be important.** Staff and volunteers who are expected to come into contact with victims, in particular children, will need abide by a strict child protection policy. This policy may entail requirements such as screening for good conduct, convictions or other forms of verification related to character (e.g. getting references from their previous employers, family members, neighbours etc.), undergoing specific training or work under special forms of supervision. Any such requirements need to be made known to the staff member or the volunteer in a transparent manner and their necessity justified. In this regard, it will not be considered as discrimination if, for the sake of adequately responding to victims' needs, certain characteristics may be preferred in employing staff or volunteers (e.g. women, persons with disabilities, or members of minority groups).

**159. Victim support organisations need to ensure a supportive work environment, which is conducive to personal development of staff and volunteers.** It is in the interest of the service as well as victims that the staff and volunteer retention rate is high. Work environments supportive for staff increase job satisfaction and hence quality of life. Content staff and volunteers in return provide better services to victims. For victims who need long-term support, it is important to have stability in care arrangements and to try to ensure continuity of personnel.

**160. Volunteers needs' must be assessed, and their motivation for volunteering clear, as it will determine attitudes towards them and the best use of their skills.** Their profiles and interest for victim support may be different: some are students or young professionals, looking for practical experience prior to job-hunting, and who may join the staff after a successful period of volunteering; others are experienced retirees, looking for ways to give back to their communities or wanting to remain active after retirement. There will also be highly skilled professionals wanting involvement in the provision of victim support services for personal or professional reasons (e.g. have experience of victimisation themselves or through a family member). There will also be 'ordinary' people who want to give back to their communities without a specific justification. It is therefore important to determine individual motives, in order to decide how best to employ volunteers and best use their skills and availability.

#### **How is this standard ensured in other systems?**

**Victim support standards of Weisser Ring** "For our work to be of a high standard, it is essential that we have a careful selection process to recruit our voluntary victim support workers"

**Article 4 Charter of victim support services, France Victimes** "Victim Assistance and Mediation staff may be either a volunteer or an employee."

## ANNEX

The annexes attached suggest an outline for potential instruments, to ensure compliance with standards. Given the necessity to adapt such instruments to the particular circumstances of each organisation, it is difficult to suggest a specific text for each instrument. However, an outline of each instrument is given, indicating the important elements.

Each instrument must respect the following initial criteria:

- Be compliant with international human rights law and the EU Victims' Rights Directive;
- Comply with the national constitution and legal order;
- Be applied in a non-discriminatory manner, but may indicate affirmative action and address vulnerabilities of certain groups;
- Be transparent and address its intended audience with clarity;
- Transparency does not require publicity in each case. Some instruments may remain internal, but need to be made known in advance to all concerned;
- Ensure that victims' needs are a priority in the work of any victim support organisation;
- Clarify who adopts and amends instruments and who is responsible for their implementation;
- Establish lines of responsibility and foresee potential sanctions for non-compliance of procedures.

Instruments indicated in annexes do not necessarily need to be established in separate documents. Some, or even all, elements may be combined in a single document (see, for example, Jasper Victim Services which combines all elements of their operations in a single manual<sup>45</sup>). What is important, however, is that all elements are identified, defined clearly and with little left to interpretation, and that they are made known to staff, volunteers, victims and/or the general public, depending on their purpose.

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<sup>45</sup> Jasper Victim Services, Policies & Procedures Manual, revised February 2010, available at: <https://www.jasper-alberta.com/DocumentCenter/View/555/Jasper-Victim-Services-Unit-Policy-and-Procedures-Manual-PDF?bidId>

## Annex 1 – Overview of the recommended standards and how to implement them

Standards	Details	Indicators	Tools for implementation
Standard 1 – Services are available without discrimination	<p>Non-discriminatory and equal access to the services: Services are provided to victims, regardless of their personal characteristics (nationality, age, language, sex etc.), whether or not the crime was reported by the victim or anyone else. This includes victims who are not legal residents in the country. Witnesses, victims' families, or any other person who is impacted by a crime should be able to access victim support services.</p> <p>The service needs to be accessible to all victims.</p>	<p>The organisation should make it clear and evident in any relevant statutory instruments (e.g. constitution, articles of incorporation or other founding document), documentation and communications that its services are for all victims.</p>	<ul style="list-style-type: none"> <li>• Statute or constitution</li> <li>• Equality and non-discrimination policy (<a href="#">Annex 8</a>)</li> <li>• Accessibility policy (<a href="#">Annex 4</a>)</li> </ul>
Standard 2 – Respect the dignity, needs and feelings of the victim	<p>Staff and volunteers must treat victims with respect and dignity. Victims need to feel that their suffering is recognised and sympathised with. Any form of secondary victimisation in victim support services is unacceptable and should be avoided at all cost. The objective of this standard is to make sure that all victims are treated equally in a manner respectful to their dignity, rights, needs and feelings.</p>	<ul style="list-style-type: none"> <li>• Staff members and volunteers treat victims in a respectful, kind and polite way.</li> <li>• Staff members and volunteers receive adequate training to deal with vulnerable victims.</li> <li>• Information and advice should be provided to victims in simple and accessible language, respecting victims' communication skills and emotional needs.</li> <li>• A grievances system is put in place and made accessible to victims without any cost or other obstacles.</li> </ul>	<ul style="list-style-type: none"> <li>• Accessibility policy (<a href="#">Annex 4</a>)</li> <li>• Human resource policy (<a href="#">Annex 2</a>)</li> <li>• Child protection policy (<a href="#">Annex 5</a>)</li> <li>• Equality and non-discrimination policy (<a href="#">Annex 8</a>)</li> </ul>
Standard 3 – Ensuring the confidentiality	<p>Communication of information can only be done with the consent of the victim. It is crucial that all personal information,</p>	<ul style="list-style-type: none"> <li>• Private interview rooms, or ensure privacy through a range of other means.</li> <li>• Victims receive comprehensive and full information about confidentiality on first</li> </ul>	<ul style="list-style-type: none"> <li>• Accessibility policy (<a href="#">Annex 4</a>)</li> <li>• Human resources policy (<a href="#">Annex 2</a>)</li> </ul>

<p>and privacy of the victim</p>	<p>received from the victim, a witness or a family member, remains confidential.</p> <p>Victim support services need to comply with the EU legislation on data collection and protection<sup>46</sup>.</p> <p>Victims should understand both the commitment to maintain confidentiality and the limitations of that commitment (conflicts between a duty of care and support to the victim and the duty to maintain privacy and respect confidentiality).</p> <p>Victims need to be able to talk in a private environment and to receive information in a confidential manner. The premises where the victims will be heard or welcomed should be a quiet environment without noisy distractions. The victim support service needs to ensure that the infrastructure and organisation of services are respectful towards victims.</p> <p>The interior of the premises should be welcoming for victims who should feel safe to speak freely about their case or request information about a sensitive topic.</p>	<p>contact with the organisation (in formats that are appropriate, to their age, communication and cultural needs).</p> <ul style="list-style-type: none"> <li>• Confidentiality requirements and data protection are covered during orientation for new staff, volunteers, contractors and students, and ongoing training.</li> <li>• A case-management system is in place to ensure safety of personal data from any unauthorised access.</li> <li>• Referral is done in a way which respects victims' privacy and ensures the protection of their data.</li> <li>• Victims' informed consent is necessary for any data sharing, unless the situation and applicable legislation necessitate sharing in the absence of such a consent (e.g. emergency situations).</li> <li>• Materials, such as posters and brochures on privacy and confidentiality are displayed and both staff and victims are always mindful of the confidentiality requirements</li> <li>• Make sure that there are private interview rooms for face-to-face or other types of direct communication with victim (phone, Viber etc.);</li> <li>• Rooms should be well insulated, discreet, pleasant to be in and clean;</li> <li>• Water and a box of tissues, at a minimum, should be ready to be handed out to the victim;</li> <li>• Smoking or the consumption of alcohol or other substances should not be permitted on the premises.</li> </ul>	<ul style="list-style-type: none"> <li>• Data protection policy (<a href="#">Annex 7</a>)</li> <li>• Volunteering policy (<a href="#">Annex 3</a>)</li> <li>• Training policy (<a href="#">Annex 6</a>)</li> </ul>
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<sup>46</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC



<p>Standard 4 – Ensure the safety and security of victims and service providers</p>	<p>Victims feel safe and secure when they seek information, advice or support from a victim support service. Apart from physical locations of services (see Standard 9), victims' safety should be ensured with other types of services.</p>	<ul style="list-style-type: none"> <li>• Risk assessment procedures are in place and are systematically reviewed for all victims.</li> <li>• Premises are located in a safe neighbourhood and provide a safe and respectful environment for victims.</li> <li>• Victims are asked if they feel comfortable and safe: to be verified throughout the process.</li> <li>• Organisational Webpage has a quick exit button.</li> <li>• Any contact initiated by the victim will be responded to within a reasonable period of time and in a manner most convenient and respectful for the victim.</li> <li>• Protocols on cooperation with other relevant institutions are put into place</li> <li>• Put into place safety and security measures, including basic standards of safety for victims within the premises.</li> </ul>	<ul style="list-style-type: none"> <li>• Risk assessment guidance document (<a href="#">Annex 9</a>)</li> <li>• Accessibility policy (<a href="#">Annex 4</a>)</li> <li>• Child protection policy (<a href="#">Annex 5</a>)</li> </ul>
<p>Standard 5 – Provide a variety of support options</p>	<p>Victim support services should be made available in a range of ways, ensuring that all victims, from all generations, all regions and with different accessibility needs can access services in a manner that is most convenient for them.</p>	<ul style="list-style-type: none"> <li>• The office is easy to reach and accessible to those with special needs and must be open at its advertised times.</li> <li>• Victims can request services electronically, by telephone and face-to-face.</li> <li>• A helpline is put in place with either national or regional coverage, and with extended access times.</li> <li>• New ways of communicating with victims are explored</li> <li>• Staff and volunteers are trained to adequately provide such services.</li> </ul>	<ul style="list-style-type: none"> <li>• Accessibility policy (<a href="#">Annex 4</a>)</li> <li>• Training policy (<a href="#">Annex 6</a>)</li> <li>• Data protection policy (<a href="#">Annex 7</a>)</li> </ul>
<p>Standard 6 – Provide quality control through the monitoring</p>	<p>Victim support services need to be subject to regular monitoring and evaluation. Evaluation can be internal or external.</p>	<ul style="list-style-type: none"> <li>• Set up an internal performance evaluation system for staff</li> <li>• Systematically collect feedback from victims, their families and friends and partner</li> </ul>	<ul style="list-style-type: none"> <li>• Evaluation questionnaire template (<a href="#">Annex 9</a>)</li> <li>• Grievances procedure</li> </ul>

<p>and evaluation of service provision</p>	<p>As the primary beneficiary of any victim support service is the victim, a good evaluation should always include victims' perspectives.</p>	<ul style="list-style-type: none"> <li>organisations, explore each instance of negative feedback.</li> <li>Constantly look for ways to improve services, introduce new ideas and develop partnerships which will be beneficial for the quality of service provided to victims.</li> <li>Aim to commission an external evaluation at least once every two years. Understanding that external evaluations might be financially demanding, peer to peer evaluation might be considered periodically in lieu.</li> <li>Have in place a complaints or grievances system for victims and ensure a due process following such a complaint.</li> <li>Provide victims with information about the feedback and complaint systems and explain to them the importance of genuine and honest feedback.</li> </ul>	<ul style="list-style-type: none"> <li>Information tools for victims (leaflets, brochures, posters, webpages etc.)</li> </ul>
<p>Standard 7 – Provide adequate and appropriate training for all staff and volunteers who work with victims</p>	<p>All staff and volunteers working with or supporting victims of crime should receive an appropriate level of training in accordance with the nature of their contact with the victim and the type of crime involved.</p> <p>It should consist of the initial – induction or orientation - training and ongoing staff development.</p> <p>Training may be provided internally – by organisation's own staff sharing their knowledge, or externally – by outsourcing training to external experts.</p>	<ul style="list-style-type: none"> <li>Induction training is provided for newly recruited staff and volunteers.</li> <li>Ongoing training is offered to existing personnel in accordance with their contact with victims as well as the nature and type of crime involved.</li> <li>Different levels of training and victim awareness raising courses are provided for staff</li> <li>Training is renewed and kept up to date to reflect the realities of the environment in which services are provided.</li> <li>Training is provided by a qualified trainer or other staff member who has adequate qualifications.</li> <li>Participation in national, regional and international networks, which offers training and exchange of best practices.</li> </ul>	<ul style="list-style-type: none"> <li>Human Resources Policy (<a href="#">Annex 2</a>)</li> <li>Training policy (<a href="#">Annex 6</a>)</li> <li>Applying for funding for projects through Erasmus+</li> <li>Use of free online training opportunities through e.g. Coursera or Alison.</li> </ul>

<p>Standard 8 – Services are provided by staff and volunteers</p>	<p>Ensure that services are provided through a combination of professional staff and dedicated volunteers who have various levels of expertise.</p> <p>Both staff and volunteers are hired through a transparent system and based on their qualifications and experience, as well as the organisations’ needs.</p> <p>Victim support organisations ensure a supportive work environment which is conducive to personal development of staff and volunteers.</p>	<ul style="list-style-type: none"> <li>• Sufficient resources, time and tools are provided to support the delivery of training.</li> </ul>	
		<ul style="list-style-type: none"> <li>• Human resources policy is in place and it clearly indicates organisational structure of the service provider, as well as minimum requirements necessary for incumbents for any paid or unpaid position.</li> <li>• Human resources policy should also contain, unless separately established, a performance appraisal system for staff members and some form of feedback to volunteers.</li> <li>• Victim support services should adhere to gender and non-discrimination standards, which will be applied also internally to staff and volunteers.</li> <li>• Code of conduct for staff and volunteers established, including a strict victim and child protection policy.</li> </ul>	<ul style="list-style-type: none"> <li>• Human resources policy (<a href="#">Annex 2</a>)</li> <li>• Training policy (<a href="#">Annex 6</a>)</li> <li>• Equality and non-discrimination policy (<a href="#">Annex 8</a>)</li> <li>• Volunteering policy (<a href="#">Annex 3</a>)</li> </ul>

## Annex 2 – Human resources policy

Human resource policies are guidelines on the approach an organisation intends to adopt in managing its staff. They represent specific guidelines to human resources managers on various matters concerning employment and state the commitment of the organisation to recruitment, promotion, compensation, training, selection etc. Human resource policy can include clauses on the following matters:

- Mission of the organisation
- Structure of the organisation (staff and board)
- Selection criteria/recruitment
- Work conditions;
- Employee salary benefits;
- Holidays and leave
- Personal growth (including training, performance evaluation, internal mobility when possible, motivational activities, personalised assistance to staff needs) – unless provided in other instruments;
- Non-discrimination and gender equality – unless provided through equality and non-discrimination policy;
- Termination conditions and procedures;
- Staff grievances;
- Disciplinary procedures;
- Personal records and data protection;
- Anti-harassment and mobbing.

## Annex 3 – Volunteering policy

The aim of a volunteer policy is to provide overall cohesion to the various policies and procedures that affect volunteering, for example recruitment, expenses, health and safety etc. It will also help define the role of volunteers within the organisation and how they can expect to be treated. Volunteering policy can include clauses on the following matters:

- Objectives of volunteering
- The volunteer's commitment to the organisation
- Recruitment and selection. For example, how volunteers are recruited, what type
- Training of volunteers (if not covered by the training policy)
- Support to and supervision of volunteers
- Health and safety
- Conditions of volunteering
- Confidentiality and data protection

## Annex 4 – Accessibility policy

The purpose of the accessibility policy in a victim support organisation is to ensure that a minimum of accessibility is provided for victims with different needs. This policy should be twofold: it should outline the organisation's objectives in ensuring accessibility for its staff, as well as of its services for its clients, with disabilities. Ensuring accessibility is an obligation based on the international human rights law<sup>47</sup>

## Annex 5 – Child protection policy

A child protection policy provides guidelines for organisations and their staff on creating a safe environment for children. It is a tool that protects both children and staff by clearly defining what action is required in order to keep children safe, and ensuring a consistency of behaviour. A child protection policy also demonstrates an organisation's commitment to children and ensures public confidence in its practices. The child protection policy can include clauses on the following matters:

- Screening of staff and volunteers, who are expected to work with children;
- Ensuring a child-friendly environment in which the child's best interests are paramount;
- Providing procedures and support specifically for children, including referral, when applicable;
- Defining clear responsibilities for the implementation of the policy and sanctions for non-compliance;

## Annex 6 – Training policy

Article 25 of the Victims' Rights Directive requires States to organise training for professionals who are likely to come into contact with victims. However, training for victims support organisations needs to go further and deeper than that.

All staff of victim support organisations who work directly with victims should receive initial and, thereafter, ongoing training.

Employee and volunteer training and development are part of good management practices and good risk management strategies. This policy suggests how an organisation trains and develops the skills of employees and volunteers.

Training policy should include clauses which will define some of the following issues:

- The policy needs to indicate who will be subject to training – all new staff members (including those who are not likely to be working directly with victims, such as IT staff) or only those who will be working directly with victims.

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<sup>47</sup> Article 9 of the UN CRPD sets out the obligation to ensure accessibility.

- Policy should indicate if there is an initial (induction) training for all new staff, and continuing training for the staff already employed. Initial training must be provided to all new staff who will work with victims. Some form of training can be provided for other staff.
- Is the training to be provided internally or externally? In the former case, the policy needs to indicate the outline of the training programme. In the latter, the policy should indicate what the requirements are for such external training and under which conditions a staff member can be directed/approved to attend external training.
- When and how is the initial training provided?. E.g. will the training be organised individually for each new staff member, or will there be training courses organised periodically for all new staff members. The latter case would be a practical solution for organisations with a high turnover of staff and volunteers.
- This document should also indicate when and how ongoing training will take place – internally or externally. An indication regarding frequency and duration of training may be stated (e.g. a minimum/maximum number of training days each year).
- The policy should ensure that the training needs are adequately identified – for example, through the staff member’s self-assessment, through a process of performance evaluation, or based on the specific requirements of the position.
- For internally organised training, the training policy should look to identify the scope of the induction training, including setting out the curriculum.

## **Annex 7 – Data protection policy**

The purpose of a data protection policy is to govern the collection, use and disclosure of personal data collected during discussion with victims of crimes. Under Article 24 of the GDPR, the Regulation states that “[w]here proportionate in relation to processing activities, [...] measures [...] shall include the implementation of appropriate data protection policies by the controller.” Data protection policy can include clauses on the following matters:

- Purposes and means of data collection;
- Use of data from service users;
- Use of data from staff and volunteers;
- Use of data from service suppliers and other professional business contacts;
- Legal provisions applicable;
- Exceptions that allow the passing of data to other agencies;
- Storage of data (including duration of retention);
- Internal access to data;
- Security of data;
- Handling of breaches of confidentiality.

## Annex 8 – Equality and non-discrimination policy

An equality and non-discrimination policy can have an effect internally and cover conditions of employment including hiring, promotions, termination and compensation, but also conditions for providing services to victims, respecting their differences and ensuring equality and non-discrimination. The protected grounds will be all those set in national legislation and international human rights law, including gender, race, national or ethnic origin, religion, sexual orientation, disability or any other personal characteristic. This policy solidifies the organisation's commitment to promoting equality and diversity through their staff and volunteering practices, as well as through providing services to victims from different backgrounds. Equality and non-discrimination policy can include clauses on the following matters:

- Statement outlining the organisation's commitment to equality and non-discrimination and emphasising particular forms of this commitment;
- Providing guidance on how to ensure equality and non-discrimination – including through affirmative action;
- Ensuring an environment free from of harassment, victimisation and unlawful discrimination;
- Ensuring sanctions in cases of non-compliance, including disciplinary and other measures;
- Providing for procedures to ensure compliance;
- Defining training needs, if not already provided through Training policy.

## Annex 9 – Risk assessment<sup>48</sup>

Each victim support organisation should be able to conduct risk assessment of victims' needs. This assessment should be conducted at the first contact with victim, and very often should be conducted by the police. However, victim support organisations should also be able to conduct risk assessment, for those victims for whom risk assessment has not been previously conducted. In some cases, where the assessment indicates the necessity

Risk assessment must look into a victim's personal situation and ensure an individualised approach. It needs to:

- Be conducted at the earliest opportunity
- Be updated as victim's situation changes
- Correspond to the victim's changing needs and personal situation
- Ensure that the victim is accompanied by a person of their choice (unless deemed contrary to victim's needs – e.g. in cases of organised crime, domestic violence etc.)

In order to establish victims' needs, a risk assessment should ensure a process to be followed. The procedure should be conducted through two basic steps (which can be combined):

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<sup>48</sup> The outline for risk assessment guidance document is based on EVVI – Evaluation of Victims Guidelines, available at: [http://www.justice.gouv.fr/publication/ewvi\\_guide\\_en.pdf](http://www.justice.gouv.fr/publication/ewvi_guide_en.pdf)

- To determine whether a victim has specific protection needs (i) depending on the personal characteristics of the victim, the type or nature of the crime, the relationship between the victim and the offender and the circumstances of the crime;
- To determine if special protection measures (ii) should be applied and what these should be (as listed in Articles 23 and 24 of the Victims' Directive).

Assessment procedure should ensure evaluation of all victims, but with some flexibility depending on severity of the crime and degree of harm to the victim. Victims may not wish to benefit from any protection measures, but that should not preclude the victim support organisation from demanding the authorities to take action if this is necessary in the interest of justice or to protect any person from harm.

To avoid further distress to the victim, special care should be taken when using the template questionnaire to ensure that the victim is not repeatedly asked the same questions. When conducting the assessment, the conductor of the assessment should be clear that it is about identification of specific protection needs or special measures.

Some victims will not have any specific protection needs or their particular needs may be apparent from the outset. For others, an in-depth assessment may be required to identify their specific needs and to determine whether, and if so which, measures would be of benefit in addressing them.

EVVI guidelines propose a questionnaire for individual assessment of victims of crimes. However, the questionnaire may not be necessarily fully applicable to the situation in Serbia. Hence, it will be necessary to conduct a revision of the approach and to create of a system of risk assessment that would fully correspond to the legal and practical environment and victims' needs in Serbia.

EVVI guidelines propose the following questions:

***I. Current situation***

Thirteen Yes/No questions are suggested in the template questionnaire:

1. Has the current incident resulted in an injury (clarification needed if that is the case)?
2. Is the victim frightened?
3. Does the victim have someone to support him or her (relatives, friends, community resources e.g. cultural, religious)?
4. Does the victim feel isolated?
5. Is the victim feeling depressed or having suicidal thoughts?
6. Is the victim in contact with the suspect (clarification needed if that is the case)?
7. Does he or she try to intimidate the victim?
8. Does the victim live with the suspect?
9. Is there any conflict over financial issues?
10. Is there any conflict over children?



11. Has the suspect ever committed acts of violence against others within the family or against pets?

12. Is the victim still able to access his or her personal documents, money...?

13. Is the victim free to move around in and/or leave his or her house?

## **II. Offence history**

Six additional questions may be asked:

1. Has the suspect ever threatened or committed acts of violence against the victim (clarification needed if that is the case)?

2. Has the suspect ever used a weapon against the victim (clarification needed if that is the case)?

3. Has the victim ever filed a complaint against the suspect?

4. Has there been an escalating series of incidents?

5. Are other persons potentially at risk (clarification needed if that is the case)?

6. Has the victim been threatened by any other person (clarification needed if that is the case)?

## **III. Suspect**

Nine other questions might be asked regarding the suspect:

1. Is the suspect identifiable?

2. Is the suspect a child (under 18 years old)?

3. Does the suspect have access to weapons (clarification needed if that is the case)?

4. Has the suspect ever been convicted of any offence against the victim (clarification needed if that is the case)?

5. Are there any outstanding court orders against the suspect (clarification needed if that is the case)?

6. Has the suspect ever been convicted of any serious offence (clarification needed if that is the case)?

7. Does the suspect have/has problems with drugs and/or alcohol (clarification needed if that is the case)?

8. Does the suspect have/has the suspect had mental health problems (clarification needed if that is the case)?

9. Has the suspect ever threatened or tried to commit suicide?

Note that not all questions need to be asked. If the victim has already given you information towards response to any further questions, note them down, without repetition. Avoid irrelevant questions (e.g. if the victim does not have any children, do not ask those questions, if the victim does not know the suspect, those questions will not be asked etc.).



