



Department of  
**Justice**

An Roinn Dlí agus Cirt  
Máinnystrie O tha Laa

**Improving the experiences of victims and witnesses in the  
criminal justice system:**

- **a new three-year Victim and Witness Strategy for Northern Ireland; and**
- **the establishment of a Victims of Crime Commissioner for Northern Ireland.**

**Consultation Report and Summary of Responses**

**September 2021**

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## 1. Introduction and Background

1.1 This document provides a summary of responses to the Department of Justice's joint consultation on:

- A new three year Victim and Witness Strategy for Northern Ireland; and
- The establishment of a Victims of Crime Commissioner for Northern Ireland.

1.2 The purpose of the consultation was to invite views on a range of proposals which would improve the experience and outcomes of victims of crime in the criminal justice system. The consultation was structured in a way that respondents were able to provide views on either initiative or to respond to both initiatives.

1.3. Section A of the consultation, a new three year Victim and Witness Strategy, was developed collaboratively by organisations represented on the Victim and Witness Steering Group (VWSG) which is comprised of the Department of Justice (DOJ), the Police Service of Northern Ireland (PSNI), the Public Prosecution Service (PPS), the Northern Ireland Courts and Tribunal Service (NICTS), the Probation Board for Northern Ireland (PBNI), Victim Support Northern Ireland and NSPCC's Young Witness Service.

1.4. Section B of the consultation, the establishment of a Victims of Crime Commissioner for Northern Ireland, was developed following engagement with a Reference Group, comprising of representatives from stakeholder organisations, from both the voluntary and community sector, and the statutory sector, to help inform proposals for such a role.

### Section A – Background

1.5 The draft Strategy has been developed to address a number of overarching themes which have been highlighted through recent inspections and surveys of victim and witness experiences. It aims to reinforce a multi-agency

commitment to delivering procedural and cultural changes that will produce improved outcomes for victims and witnesses in the criminal justice system.

- 1.6 The consultation proposals set out the background, strategic context and drivers for a new strategy and asked consultees to consider and comment on the proposed mission statement and strategic aim; strategic priorities; associated objectives and actions. It particularly welcomed views as to whether these will support delivery of the strategic aim of supporting victims and witnesses and improving their experience of the criminal justice system; and also invited comments or suggestions in relation to any gaps in the strategy.
- 1.7 The proposed programme of work that the strategy represents was structured around four strategic priorities, along with anticipated outcomes and measures. Against each of the four priorities there were a number of proposed objectives and associated actions that would support delivery of the overarching strategic aim, as well as the intended outcomes. As part of the consultation we were particularly keen to hear as to whether these were the right objectives and whether the proposed actions will, collectively, help to support victims and witnesses and improve their experiences of the criminal justice system.
- 1.8 The consultation also proposed that implementation of the strategy needs to be approached with an underpinning principle of working in partnership.

## Section B – Background

- 1.9 In late 2020, the Minister of Justice established a Reference Group, made up of experts from the voluntary and community sector and the statutory sector who work directly with victims of crime, to provide her with advice and inform her thinking on the need for a Victims of Crime Commissioner and the role and functions required for such a post. The Reference Group reported to the Minister in December 2020 and met with her in January 2021 to discuss their views. After considering the evidence and the advice provided, the Minister decided that a Victims of Crime Commissioner would add value to the good work that is already in place for victims of crime, and would be a positive step forward in providing a voice for all victims, promoting best practice and driving

improved outcomes and experiences for victims within the criminal justice system.

- 1.10 The Minister indicated that she wanted to appoint a Victims of Crime Commissioner before the end of this mandate in March 2022. Since it was not possible to bring forward the necessary legislation to put a Commissioner on a statutory footing by that date, the proposals focused on the establishment of an initial interim Victims of Crime Commissioner Designate, who will be able to represent victims of crime and will also help to scope development of legislation to establish a statutory Victims of Crime Commissioner in the next mandate.
- 1.11 The consultation sought views on the creation of the Commissioner Designate role and on the proposed role and functions, including whether they should also be required to have a particular focus on the specific needs of particularly vulnerable groups, including victims of domestic and sexual abuse and hate crime. We also sought views on whether the Commissioner should establish an Advisory Panel; on their autonomy and independence; and on whether they should be required to develop a Strategic Plan. We sought views on whether the Minister of Justice should be able to ask the Victims of Crime Commissioner to conduct a thematic review and advise on particular victim-related priorities.

## 2. The Consultation Process

- 2.1 The Department launched the consultation on 6 May 2021 via a press release and an announcement on social media. Full details were published on the DoJ website and a link to the consultation on Citizen Space (a digital tool for delivery) was distributed to a wide range of stakeholders, including all criminal justice organisations through the consultation list, the Victims and Witnesses Steering Group, and the Victims of Crime Commissioner Reference Group. Throughout the consultation period, DoJ Press Office regularly used social media channels to promote the consultation and encourage individuals and organisations to respond.

**2.2** The consultation ran for 12 weeks and ended on 29 July 2021. **A total of 35 responses were received in relation to Section A and a total of 30 responses in relation to Section B.**

**2.3** This report summarises the responses to the consultation questions. The Department of Justice is grateful to those who took the time to respond.

### 3. Overview of responses

**3.1** A total of 35 responses were received in relation to Section A of the consultation, of those:

- 9 responses were from victims/parents of victims
- 5 responses were from frontline workers/service providers
- 2 responses were from members of the public
- 19 responses were from organisations (and a number of these were informed by and incorporated views expressed in focus groups)
- A total of 12 questionnaires were received, 18 completed responses on Citizen Space and 5 respondents forwarded submissions rather than questionnaires.

#### **3.2 List of Respondents to Section A:**

- Barnardo's Northern Ireland
- Commission for Victims and Survivors Northern Ireland
- Hourglass
- MindWise
- National Society for the Prevention of Cruelty to Children
- Northern Ireland Human Rights Commission

- Northern Ireland Association for the Care and Resettlement of Offenders
- Probation Board for Northern Ireland
- Ulster Unionist Party
- Sinn Féin
- The Law Society
- The Migrant Centre
- The Police Service of Northern Ireland
- The Rainbow Project
- Victim Support Northern Ireland
- Women's Aid
- 3 responses from members of service providers
- 16 responses from individuals

3.3 A total of 30 responses were received in relation to Section B of the consultation, of those:

- 9 responses were from victims/parents of victims
- 4 responses were from frontline workers/service providers
- 1 response was from a member of the public
- 16 responses were from organisations (again, a number of these were informed by and incorporated views expressed in focus groups)
- A total of 11 questionnaires were received, 14 completed responses on Citizen Space and 5 respondents forwarded submissions rather than questionnaires.

#### **3.4 List of Respondents to Section B:**

- Barnardo's Northern Ireland

- Commission for Victims and Survivors Northern Ireland
- Hourglass
- MindWise
- National Society for the Prevention of Cruelty to Children
- Northern Ireland Human Rights Commission
- Probation Board for Northern Ireland
- Ulster Unionist Party
- Sinn Féin
- The Law Society
- The Migrant Centre
- The Police Service of Northern Ireland
- The Rainbow Project
- Victims and Survivors Service
- Victim Support Northern Ireland
- Women's Aid
- 14 individuals

3.5 For both Sections A and B, direct engagement with victims of crime to obtain feedback and views, through Victim Support NI, was completed through the following:

- 3 focus groups with a total of 8 participants;
- 20 semi-structured one to one interviews;
- A survey of Witness Service clients (victims of crime or prosecution witnesses) resulting in 32 completed surveys (17 victims of crime, 11 prosecution witnesses and 4 friends and family in court for support); and
- A wider survey of members of the public who have been victims of crime themselves, had supported a friend or family member who had been a victim, or were professionals working in the field – resulting in a



total of 52 people responded to the survey: 23 victims of crime, 14 who supported a victim in a personal capacity, and 15 professionals.

3.6 We understand that Women's Aid also carried out extensive engagement with their clients which has informed the consultation response they submitted and that, in addition, a responses from organisations that work with children and young people were informed by engagement with young people or with their practitioners who work directly children and young people.

3.7 On 22 June 2021, the Minister met 12 members of the Reference Group that had been originally set up to help shape proposals for the establishment of the Victims of Crime Commissioner to discuss both sections of the consultation proposals in more detail. A summary of the main points from this discussion is included at the end of both Section 4 and Section 5 of this report. Those in attendance included:

- Age Northern Ireland
- Commissioner for Older People NI.
- Disability Hate Crime Advocate (based in Leonard Cheshire)
- Hourglass
- Nexus
- The Rainbow Project
- Men's Advisory Project
- National Society for the Prevention of Cruelty to Children
- Probation Board for Northern Ireland
- Racial Hate Crime Support Worker (based in Migrant Centre NI North East)
- Victim Support Northern Ireland
- Women's Aid

3.8 As a summary, this does not reflect every view on every question, but seeks to highlight the key areas, support for and opposition to the proposals.

- 3.9 While most respondents provided qualitative responses across all questions, in some cases some respondents chose not to answer particular questions or to provide any further comments. For those who responded by submissions rather than addressing each question in sequence, the comments have been summarized under the relevant questions and, where relevant, some of these have been noted as “not answered” regarding the yes/no question.
- 3.10 The views and comments recorded under the consultation are summarised below. The Department has used the Next Steps section to highlight the main issues that require further consideration and to confirm the next steps to be taken.

#### 4. Section A - A New Draft Victim and Witness Strategy: Summary of responses and comments

##### PROPOSAL:

We are proposing that implementation of the proposed strategy should help to make progress towards the direction set out in the aspirational mission statement that “victims and witnesses are at the centre of the criminal justice system”.

<b>Question A.1:</b>			
<i>Mission statement: ‘Victims and witnesses are at the centre of the criminal justice system’</i>			
<i>Do you agree that this is an appropriate longer term mission statement to work towards?</i>			
Y/N			
<b>Total Responses – 35</b>	<b>Yes – 26</b>	<b>No - 6</b>	<b>Not answered – 3</b>
<b>Summary of comments</b>		<b>DOJ response</b>	
One response emphasised the need for inclusivity of LGBTQIA+ people		Noted – the strategy is intended to be inclusive of all victims.	
Some responses, whilst supportive noted that delivery of mission statement would require not just operational changes but wholesale culture change across the system		Noted – we agree which is why the strategy seeks to strengthen the role of leaders across the criminal justice system to be champions for victims and witnesses.	
One response from an individual who identified as a victim welcomed the strategy, noting relief “that we as victims will have a voice”.		Noted	
One response agreed that victims and witnesses should be at the heart of the system but added that there should be a focus on hate crime.		<p>Noted. The mission statement is intended to be inclusive of all victims of crime.</p> <p>However, specific work is underway to implement the recommendations of Judge Marrinan’s Hate Crime review, which is part of the wider strategic framework that this strategy is aligned to.</p> <p>Also note that the proposals for a Victims of Crime Commissioner under</p>	

	<p>this strategy include a specific role for the Commissioner in respect of victims of hate crime.</p>
<p>Some responses suggested that the statement should go farther:</p> <p>Including a proposal to provide justice for victims as well as care and provision of all help and support required by victims and witnesses who are at the centre of the criminal justice system.</p>	<p>As noted the mission statement is intended to set out a high level direction of travel which the strategy will take us towards.</p>
<p>One response welcomed the strategy but added that it needs to define what we mean by victims and witnesses</p>	<p><b>Accept</b> – we have made a revision to the opening narrative to clarify this.</p>
<p>Another response was supportive of the mission statement which it set out was needed in order to counter the perception that the criminal justice system prioritises the needs of offenders over the needs of victims</p>	<p>Noted.</p>
<p>One response suggested that to truly deliver against the mission statement the criminal justice system should be restructured to build in participatory rights for victims within it.</p>	<p>Noted. We do not believe that we have capacity to take forward a fundamental review of the criminal justice system as this within the lifespan of this strategy as well as delivering on other commitments within the strategy.</p> <p>Our focus is on improving the experiences of victims and witnesses within the criminal justice system and on ensuring that we consistently deliver the information, services and support that they are entitled to.</p> <p>However we will also explore whether and how it may be possible to strengthen and advance the rights and protections available to victims and witnesses where this is appropriate and where this can be achieved without compromising the principle of an impartial and fair justice system.</p> <p>There are a number of measures within the strategy that are already helping to achieve this and to enhance victims'</p>

	<p>participatory rights within the criminal justice system.</p> <ul style="list-style-type: none"> <li>• New initiatives include the provision of remote evidence facilities for vulnerable and child witnesses and the provision of legal advice for complainants in sexual offence cases.</li> <li>• In addition we have commenced work to consider not only how to improve the provision of information to victims and witnesses, but also to explore whether the criminal justice system is providing sufficient information.</li> <li>• We have also included measures to raise awareness of the Charters in order to ensure that victims and witnesses are aware of and able to access their existing rights, including rights such as the ability to make a Victim Impact Statement.</li> <li>• We intend to take forward work to explore how best to further develop and ensure access to restorative justice opportunities for victims. We have revised SP1 to include an objective around restorative justice practices.</li> <li>• Fundamentally, one of the proposed functions of the Victims of Crime Commissioner is to review the effectiveness of the adequacy and effectiveness of our laws and practices - including the Victims Charter - and to make recommendations for improvement.</li> </ul>
<p>One response was supportive of the statement but highlighted the need to tackle delay because of the impact it has on victims and witnesses of crime.</p>	<p>Noted. We recognise the huge impact that delay can have on victims and witnesses.</p> <p>Whilst we have not included any specific measures to reduce delay within the objectives of this strategy, we have set out the wider strategic framework which includes a significant</p>

	<p>programme of priority work which the Department is leading to speed up justice and reduce delay in the criminal justice system.</p> <p>On the basis of consultation responses we have revised the opening chapter of the strategy to include more detailed information on the current programme of work to reduce delay.</p>
<p>One response was supportive but raised a concern that the mission statement is not defined by clear, focused and with time- bound achievable goals.</p>	<p>Noted – However the mission statement is intended to be a high level statement of the overall direction of travel under this strategy.</p> <p>However the strategic aim is intended to be achieved within the three year lifespan of the strategy and it is supported by clear focused objectives and time-bound actions to deliver these.</p>
<p>Some responses raised concerns that the mission statement needs to be more balanced, with greater emphasis on supporting victims, but also balanced with fairness and justice Suggested an expanded statement such as "The needs of victims and witnesses are at the centre of a system which ensures the objective application of justice".</p>	<p>Noted. Agree that it is helpful to clarify the need for balance and have revised the mission statement accordingly to read</p> <p><b><i>Working to ensure that victims and witnesses are central to a criminal justice system which ensures the fair administration of justice".</i></b></p>
<p>A number of responses highlighted the need for the strategy to make provision for restorative practices.</p>	<p>Noted – The strategy is aligned with the DOJ's Adult Restorative Justice Strategy. We also intend to take forward work to explore how best to further develop and ensure access to restorative justice opportunities for victims. We have revised SP1 to include an objective around restorative justice practices.</p>
<p>One response was highly critical and set out that the strategy is a meaningless document which will detract from and delay actually addressing the faults within the system.</p>	<p>Noted – this is not our intention. Rather, the strategy sets out an ambitious programme of work which in many parts is already underway, to address the weaknesses in the system that have been highlighted by victim and witness feedback and in several key reviews and reports.</p>

One response was broadly supportive whilst recommending some revision to manage expectations that the mission statement will not be fully implemented in the lifespan of the strategy “we work to ensure that victims and witnesses are at the centre of the criminal justice system”	Agree and accept – have revised the mission statement accordingly
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**PROPOSAL:**

We are proposing that the strategic aim, to be delivered within the three year life span of the draft strategy should be “supporting victims and witnesses and improving their experiences of the criminal justice system”.

<b>Question A.2:</b>			
<i>Strategic Aim: “supporting victims and witnesses and improving their experiences of the criminal justice system”</i>			
<i>Do you agree that this is an appropriate strategic aim for the draft strategy?</i>			
Y/N			
<b>Total Responses</b> - 35	<b>Yes – 31</b>	<b>No - 1</b>	<b>Not answered - 3</b>
<b>Summary of comments</b>		<b>DOJ response</b>	
A majority were strongly supportive of the aim which they felt would increase victim confidence in the criminal justice system, but there were some additional comments and observations.			
A number of responses emphasised the need to improve delivery of existing rights and supports under the Charters		Agree – the body of work under SP2, 3 and 4 is intended to support this.	
Others highlighted the need to improve communication with victims and witnesses and extend access to advocates to act as SPOCs, whilst also improving access to information for advocates		Agree – the strategy includes a number of objectives and actions intended to improve how the criminal justice system communicate with victims and witnesses. A working group has been established to take this forward, including the development of a digital information portal for victims and witnesses.	

<p>Some responses again recommended that the strategy should provide better access to restorative justice opportunities for victims to engage</p>	<p>Noted – the strategy is aligned with the DOJ’s Adult Restorative Justice Strategy. We also intend to take forward work to explore how best to further develop and ensure access to restorative justice opportunities for victims. We have revised SP1 to include an objective around restorative justice practices.</p>
<p>Several responses were supportive but observed that the strategy needs to be properly resourced and emphasised the importance of measuring the effectiveness of the strategy, noting that delivery should be evaluated against outcomes, including in relation to victim satisfaction. Some specific suggested measures were also proposed.</p>	<p>Noted and agree in principle. Any funding requirements for 2021-22 would be required to be considered as part of the in-year monitoring process alongside competing bids.</p> <p>As future year budgets are not yet set, funding for 2022-23 onwards would need to be considered as part of the future year budget process and the scale and pace of our delivery will be subject to available resources.</p> <p>Agree that the strategy should be evaluated against outcomes. We have set out anticipated outcomes and measures in the draft strategy and have ensure that these reflect and incorporate the measures recommended in consultation responses.</p> <p>In addition individual projects under the strategy will be subject to specific evaluation measures against objectives.</p>
<p>A few responses observed that delivery of the strategic aim will require both system and attitudinal change</p>	<p>Agree – The strategy seeks to deliver both of these. We recognise that attitudinal change will take time but the strategy commits to enhancing the role of leadership to support delivery of this.</p>
<p>One response recommended a clarification that the strategic aim should apply to ALL victims and witnesses (noting that some offenders may also be victims with specific needs)</p>	<p><b>We have revised the strategic aim to include a reference to all victims.</b></p> <p>We acknowledge the point about this overlap in relation to some victims. As noted within the opening sections, this strategy sits within and is aligned to a wider strategic framework including ongoing work by NIPS, Youth Justice Agency and PBNI with offenders, including offenders who are also victims</p>



	<p>of crime. For example, within NIPS this issue is recognised by providing counselling or support from organisations such as, for example, Nexus and Women's Aid. Often this support work has to take place before the individual addresses his/her own offending behaviour.</p>
<p>Some responses recommended revisions to strengthen the strategic aim</p>	<p>We acknowledge these recommendations and the aspiration to be as effective as possible in meeting the needs of victims and improving their experiences of the justice system.</p> <p>In developing this strategy we have sought to set a challenging and ambitious, yet still achievable, strategic aim and a realistic programme of work. We are confident of our ability to deliver against this strategic aim but would wish to avoid further revisions which we are not confident that we can achieve.</p>
<p>A number of respondents noted the perception that defendants are prioritised above victims within the criminal justice system.</p>	<p>Noted</p>
<p>One response noted the potential for shared learning and collaboration between the proposed Victims of Crime Commissioner and the Victims and Survivors Commissioner.</p>	<p>Noted.</p> <p>We recognise that there is scope for collaborative working with a number of other commissioners on areas of mutual interest.</p>
<p>However others reiterated the need for a greater focus on victims to be balanced against fairness and justice within the system</p>	<p>Noted – this has been addressed in the revised mission statement</p>
<p>One response was supportive but again raised the need for clarity to be provided on the definition of victims and on agency responsibilities</p>	<p>Have included definitions in the revised opening chapters of the strategy</p>

## PROPOSAL:

Four strategic priorities have been identified, the first of which focuses on improving our understanding of the immediate and longer term needs of victims and what works best in response to these needs. Strategic priorities, 2, 3, and 4 are what we need to do to deliver those needs.

<b>Question A.3:</b>			
<i>Do you agree that the four proposed priorities are the appropriate areas that we should prioritise in order to deliver the strategic aim of supporting victims and witnesses and improving their experiences of the criminal justice system?</i>			
Y / N			
<b>Total Responses</b> - 35	<b>Yes – 29</b>	<b>No - 3</b>	<b>Not answered - 3</b>
<b>Summary of comments</b>		<b>DOJ response</b>	
Most responses were supportive of the four proposed strategic priorities. This question attracted fewer comments than others, although there were a number of further comments, concerns and suggestions raised.			
A number of responses expressed strong support for SP1, with a focus on learning and research, especially in relation to longer term needs of victims and witnesses.  Also emphasised the need for research to be inclusive of all victim voices, noting the most marginalised may often be the most vulnerable		Noted- we believe the strategy already is aligned with this.	
One response noted that research should not be in isolation but needs to be built on with operational responses that will adapt to meet emerging learning or changing needs arising from SP1.		Noted and agree. The strategy is intended to do this	
One response acknowledged that the four strategic priorities are broadly aligned with recommendations made in reports and reviews.		Noted	

<p>One response noted that the longer term initiatives are consistent with the need for cultural and operational change.</p>	<p>Noted and agree</p>
<p>One response noted the importance of SP2 and welcomed the ongoing steps to deliver against this.</p>	<p>Noted</p>
<p>SP3 was also seen to be critical to effective delivery of the strategic aim.</p>	<p>Noted</p>
<p>A number of responses recommended the need for the strategy to also incorporate the development of restorative practices for victims.</p>	<p>Noted – the strategy is aligned with the DOJ’s Adult Restorative Justice Strategy. We also intend to take forward work to explore how best to further develop and ensure access to restorative justice opportunities for victims. We have revised SP1 to include an objective around restorative justice practices.</p>
<p>One response noted the cross-over between SP2 and SP4 (in terms of the actual experiences of victims). It recommended a revision to extend SP4 beyond delivery of entitlements to <b>strengthen and advance the rights and protections available to victims and witnesses</b></p>	<p>Our priority in developing SP4 has been to focus on consistent delivery of the existing entitlements under the Victim and Witness Charters.</p> <p>We believe that this priority is the right one to focus on. However we do also want to explore how we might strengthen and advance the rights and protections available to victims and witnesses where this is appropriate and where it can be achieved without compromising the principle of an impartial and fair justice system.</p> <p>We believe that there are a number of measures within the strategy that are already helping to achieve this, such as the provision of remote evidence facilities for vulnerable and child witnesses and the provision of legal advice for complainants in sexual offence cases.</p> <p>In addition we have commenced work to consider not only how to improve the provision of information to victims and witnesses, but also to explore whether the criminal justice system is providing sufficient information.</p>

	<p>Fundamentally, one of the proposed functions of the Victims of Crime Commissioner is to review the effectiveness of the adequacy and effectiveness of our laws and practices - including the Victims Charter - and to make recommendations for improvement.</p>
<p>A number of responses highlighted the need for better, more timely and consistent information to be available to victims and witnesses</p>	<p>SP4 includes a number of commitments which are intended to deliver this, including enhancements to the Victim and Witness Care Unit and the development of a digital information portal.</p>
<p>A number of responses noted the importance of support for victims.</p> <p>One response noted that the Department of Health and its Trusts should be subject to a 'Victims Charter' and obliged to provide help and support to victims.</p>	<p>Noted</p> <p>Partnership is an underpinning principle to the delivery of this strategy and we recognise the need to work collaboratively with the Department of Health.</p> <p>We will engage with other Departments and organisations as appropriate on how we can work collectively with them to improve outcomes for victims and witnesses.</p>
<p>One response recommended that DOJ should establish a homicide service in Northern Ireland.</p>	<p>SP2 includes a commitment to consider how support services for families bereaved by homicide could be extended in 2023/24</p>
<p>One response called for proper sentencing and an end, albeit by gradual reduction, to the 50% remission scheme would go a long way to showing victims and offenders that crime is not considered another occupation. This should be a main focus of support for the victims of crime commissioner</p>	<p>We acknowledge the keen interest in sentencing and the level of confusion that sentencing can cause.</p> <p>SP4 includes a commitment to put in place measures to raise public awareness and understanding of sentencing.</p> <p>In addition we have included a new section in the opening chapters of the strategy setting out more information on the programme of work that the Department is leading following a recent consultation on the Sentencing Policy Review, to increase transparency and understanding of sentencing and to ensure a robust sentencing framework.</p>

	Automatic 50% remission for fixed term sentences of 12 months and over was abolished in 2008 when significant changes to the sentencing framework were introduced. For those sentences remission was replaced with release on licence, breach of which can result in an offender being returned to custody for the remainder of his or her sentence. There are no plans to abolish release on licence.
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**PROPOSAL:**

Strategic Priority 1 Objectives (Improved understanding of the needs, interests and experiences of victims and witnesses).

- Improved understanding of the experiences of victims and witnesses within the criminal justice system; their needs, interests and views.
- Improved understanding of the longer-term needs of victims and witnesses.
- Improved awareness of the best practice responses to the needs and interests of victims and witnesses.

<b>Question A.4:</b>			
<i>Do you agree that these are the objectives under SP1 that we should be focused on in order to support delivery of the strategic aim?</i>			
<b>Total Responses</b> - 35	<b>Yes – 30</b>	<b>No - 0</b>	<b>Not answered - 5</b>
<b>Summary of comments</b>		<b>DOJ response</b>	
All respondents expressed support of this objective  Most respondents who were victims emphasised the need for improvement across the criminal justice system		Noted	
A number of respondents noted the need for outcomes to be measured including the need for a baseline.		We have set out anticipated outcomes and measures in the draft strategy and have added to these to reflect additional measures recommended in a number of consultation responses.  In addition individual projects under the strategy will be subject to specific	

	<p>evaluation measures. Previous surveys, reports, focus groups and victim/witness feedback have provided a baseline which has also helped to inform the development of this strategy.</p>
<p>A number of responses emphasised the need for partnership delivery and some noted the role of other departments and third sector organisations in dealing with victims and witnesses</p>	<p>Partnership is an underpinning principle to the delivery of this strategy. The Victim and Witness Charters set out the responsibilities of criminal justice organisations. We will also engage with other Departments and organisations as appropriate on how we can work collectively with them to improve outcomes for victims and witnesses.</p>
<p>A number of responses emphasised the need for training, including better awareness across the CJOs of the charters and in particular the development of a trauma informed approach in respect of dealing with victims including their specific needs</p>	<p>Noted and agree. SP3 aims to embed an increased focus on victim and witness needs across criminal justice organisations and includes a number of objectives and actions to deliver this – including measures to address training needs through trauma-informed training, enhance awareness of the Charters and to drive continuous improvement through learning from complaints and victim/witness feedback.</p>
<p>More clarity was sought on how the longer term needs of victims and witnesses will actually be addressed in the 3 year period of the strategy.</p>	<p>The strategy sets out a number of steps towards this. The first step is work under SP1 to understand better what the longer terms needs of victims and witnesses are and to look at existing best practice.</p> <p>This is intended to inform further work under SP2 to scope delivery options including engagement with other interested Departments.</p>
<p>Some responses emphasised the need for research to be inclusive of all victim voices, noting the most marginalised may often be the most vulnerable</p>	<p>Noted- believe the strategy complies.</p>

<b>Question A.5:</b>			
<i>Do you agree that the actions that we have proposed will help us to achieve these objectives?</i>			
<b>Total Responses</b> - 35	<b>Yes - 27</b>	<b>No - 3</b>	<b>Not answered – 5</b>
<b>Summary of comments</b>		<b>DOJ response</b>	
It was commented that the strategy should pay particular attention to the <b>needs of vulnerable victims including those who are children and those with hidden disabilities including speech and language and communication issues</b> who may have particular difficulty understanding the workings of the criminal justice process.		Noted. There are a number of measures within the strategy that are intended to make specific provision for vulnerable victims and witnesses including vulnerable children.  This includes continued provision for assistance through the registered intermediary scheme and continued support for the delivery of support through NSPCC Young Witness Service.	
One response asked that in mapping the victim and witness journey we also look specifically at the journey for victims and witnesses who are children		Noted – we will refer this to the Victim and Witness Steering Group.	
The same response suggested the development of a research programme to understand safeguarding and child protection in suspected cases of child abuse.		Noted.  The Victim and Witness Steering Group will take forward work to identify research priorities. We will include this for consideration, however also note that this piece of work may be better led by other groups (e.g. the DOH-led Child Protection Senior Officers Group, CPSOG) – we will also raise this suggestion with CPSOG.	
Some responses emphasised the need around vulnerable e.g. reporting crime under threat, coercive control and hate crime being experienced by BAME groups.		Noted. The Department already engages with communities in a range of ways and this will continue to inform how we identify emerging needs and our operational responses.	
One response cited the Scottish ‘hate crime model’ noting that it “can deal with any offence, not just the limited suite of offences currently dealt with as aggravated offences for race and religion alone under the 1998 Act in		Noted.  We have shared comments with the Department’s Hate Crime policy team for consideration.	

<p>England and Wales.” although should be tailored to NI</p>	
<p>A number of responses highlighted the need for appropriate resources</p>	<p>Noted and agree in principle. Any funding requirements for 2021-22 would be required to be considered as part of the in-year monitoring process alongside competing bids.</p> <p>As future year budgets are not yet set, funding for 2022-23 onwards would need to be considered as part of the future year budget process and the scale and pace of our delivery will be subject to available resources.</p>
<p>It was suggested that Strategic Priority 1 (3) should reach further than “improved awareness” in order to deliver the Strategy and perhaps more of a commitment to introducing best practice be set out.</p>	<p>Noted. Our intention is that learning and best practice under SP1 should continue to inform delivery of work programmes set out in SP2, SP3 and SP4 throughout the life of the strategy.</p>
<p>A number of respondents who were victims raised concern about effective case information being provided as well as their experience engaging with complaints procedures.</p>	<p>We recognise the need to learn about addressing complaints. SP4 intends to make it easier by assisting victims to make complaints but also assist the CJ system in identifying and responding to issues and trends emerging through the complaints process. This includes the establishment of a Victims of Crime commissioner, in addition, SP4 includes a series of measures intended to improve the provision of information to victims and witnesses of crime.</p>
<p>One contributor emphasised the importance of mapping and measuring the effectiveness of the strategy alongside existing and new research in order to measure the progress and success of this strategy.</p>	<p>Noted.</p> <p>Agree that the strategy should be evaluated against outcomes. We have set out anticipated outcomes and measures in the draft strategy and have added to these to reflect additional measures recommended in a number of consultation responses.</p> <p>In addition individual projects under the strategy will be subject to specific evaluation measures. Previous surveys, reports, focus groups and victim/witness feedback have provided</p>



	a baseline which has also helped to inform the development of this strategy.
One response recommend that further work is done to understand the reasons behind attrition rates	We will seek to capture this information in relation to Gillen and where possible although recognise it may not always be possible.
On advocacy it was raised that the development of a specialist LGBTQIA+ Domestic and Sexual Violence advocate.	Noted and we have passed to the DV policy lead for the department for consideration.
There is still an issue in regards to level of understanding within the PSNI and Criminal Justice partners to the particular barriers to LGBTQIA+ people in accessing support and reporting incidents of domestic abuse.	Noted. The strategy includes commitments around the development and delivery of trauma informed training. The department is committed to ongoing engagement with a wide range of stakeholders and continues to fund hate crime advocates. The strategy also includes a commitment around the provision of advocacy services to victims of domestic and sexual abuse. In addition the proposed Victims of Crime Commissioner will have a specific focus on victims of both domestic abuse and hate crime and will help to drive improvements.
One response raised the issue of repeat victimisation in relation to hate crime noting a role for other departments and agencies	Noted we have passed to the Departmental Hate Crime policy lead for information and consideration. We will also engage with other Departments and organisations as appropriate on how we can work collectively with them to improve outcomes for victims and witnesses.

## PROPOSAL:

Strategic Priority 2 Objectives and actions (Ensuring victims and witnesses receive the emotional and practical support they need)

- Victims and witnesses receive the emotional support that they need.
- Victims and witnesses receive the practical support that they need to give their best evidence.
- Options to meet the longer-term needs of victims and witnesses are scoped out.

<b>Question A.6:</b>			
<i>Do you agree that these are the objectives under SP2 that we should be focused on in order to support delivery of the strategic aim?</i>			
<b>Total Responses</b> - 35	<b>Yes - 30</b>	<b>No - 0</b>	<b>Not answered - 5</b>
<b>Summary of comments</b>		<b>DOJ response</b>	
There was broad support for the objectives under SP2 with a number of respondents noting specific examples of progress already made towards enhancing provision within this area			
There was support for continuous a needs assessment including ongoing assessment of vulnerabilities. Respondents noted the need for improved collaboration between PSNI PPS and VSNI.		Noted. The intention is that the planned Victim and Witness needs assessment service will deliver this to enhance provision of care.  The needs assessment service will be embedded within the victim and witness care unit to provide an improved joined up response	
There was some support for an end to end support service including advocacy and support worker roles		We do not believe this is achievable in the lifespan of the strategy, however other measures under the strategy are intended to enhance support to victims according to need, including the development of the needs assessment service.	
Several respondents highlighted that victims needed better information of the criminal justice system and on available support, including a proposal for greater use of digital media. They also saw a		Whilst there is already provision in place to signpost victims to support, a number of the measures under the strategy are intended enhance this provision.	

<p>trauma informed response as underpinning this.</p>	<p>Further measures are included under SP4 to raise awareness of rights and entitlement under the charters and to improve information for victims. This includes the development of a digital information portal for victims and witnesses</p> <p>SP3 – work is well developed to provide a trauma informed training framework – from a victim perspective - for the criminal justice system</p>
<p>A number of respondents also highlighted the needs around the availability of restorative practices</p>	<p>Noted. The strategy is aligned with the DOJ's Adult Restorative Justice Strategy. We also intend to take forward work to explore how best to further develop and ensure access to restorative justice opportunities for victims. We have revised SP1 to include an objective around restorative justice practices.</p>
<p>Some responses noted that work to address longer term needs should consider the wider impact of crime as well as the role of other services (particularly Health) and the benefits of early intervention</p>	<p>Noted. Further work is planned under SP2 to better understand the needs of victims and witnesses</p> <p>We will also engage with other Departments and organisations as appropriate on how we can work collectively with them to improve outcomes for victims and witnesses.</p>
<p>On Objective 2, one response suggested the wording should be more victim focused</p>	<p>Accept.</p> <p>Objective 2 wording revised to <b><i>'Victim and witnesses receive practical support to give best evidence in a manner that minimises trauma'</i></b></p>
<p>Again, respondents highlighted the impact on victims and witnesses of delay within the criminal justice system</p>	<p>Noted and acknowledge the significant impact that delay within the criminal justice system has on victims and witnesses.</p> <p>The strategy sets out the wider strategic framework which includes priority work which the Department is leading to speed up justice and reduce delay in the criminal justice system.</p> <p>We have revised the opening chapters of the strategy to include more detailed</p>

	information on the significant programme of work that is being taken forward to reduce delay.
Two respondents emphasised that NI should have a Homicide Service.	SP2 includes a commitment to consider how support services for families bereaved by homicide could be extended in 2023/24
One response cited the Scotland's Victims' Fund as an example of positive support for exploration in NI as a means of providing assistance and increasing confidence in the CJ system.	DoJ already operates a Victims of Crime Fund for Northern Ireland which was introduced in 2012. Unlike the Scottish Victims' Surcharge Fund, this does not operate on the basis a grant application scheme, which, as the Fund was being developed, was assessed to be too resource intensive a model to operate effectively and not provide the best and most effective use of funding available under the NI Offender Levy.  Instead, the NI Victims of Crime Fund allocates funds received from the Offender Levy for projects that support victims and witnesses in the criminal justice process and to date has mainly been used for strategic initiatives
One response called for a clear commitment to establishing a Barnahaus model	SP2 does include a commitment to develop and implement a comprehensive and wrap around approach to child victims of sexual offenses in line with the Gillen review.  The Gillen review recommended consideration of a Barnahaus type model for Northern Ireland. <b>We have revised the measures under SP2 to include an explicit reference to our commitment to take forward consideration of a Barnahaus model.</b>
One response noted that child safeguarding a protection should frame the SP2 actions.	We agree.  It is our intention that all of the measures relating to child victims and witnesses need to be developed within this framework however, we have made this explicit with a further revision to the strategic context chapter of the strategy

Respondents again highlighted the importance of appropriate resourcing to support measures under SP2

Noted and agree in principle. Any funding requirements for 2021-22 would be required to be considered as part of the in-year monitoring process alongside competing bids.

As future year budgets are not yet set, funding for 2022-23 onwards would need to be considered as part of the future year budget process and the scale and pace of our delivery will be subject to available resources.

**Question A.7:**  
*Do you agree that the actions that we have proposed will help us to achieve these objectives?*

<b>Total Responses</b> - 35	<b>Yes - 29</b>	<b>No - 1</b>	<b>Not answered – 5</b>
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<b>Summary of comments</b>	<b>DOJ response</b>
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<p>There was broad support for the proposed actions across all responses. In particular respondents welcomed additional special measures, such as work to deliver remote evidence facilities; work to establish a pilot for pre-recorded cross-examination and work to develop a wrap-around service model for child witnesses in sexual offence cases.</p> <p>Some additional comments, observations and recommendations were made.</p>	
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<p>Respondents emphasised again the importance of the longer term needs of victims, which would evolve over time and noted that this was an area that had been overlooked.</p> <p>One response noted that victims may also have longer term needs where there is a decision not to prosecute</p>	<p>As noted, we acknowledge these comments and note again further work is planned under SP1 to better understand the needs of victims and witnesses in order to inform work to scope options to meet these needs, under SP2.</p> <p>PPS has responded to the comment on decisions not to prosecute, advising that if a “no prosecution” decision issues, PPS fully understand that this can often be very difficult for victims to hear. They therefore take great care to ensure to mitigate against this by providing the following service:-</p> <ul style="list-style-type: none"> <li>• The victim will be informed of the decision by letter from their VWCU Case Officer. Reasons for this decision will also be provided in and in most cases, this will be in general terms and will refer to the Test for Prosecution. It should be noted that in a wide range of cases which might be classified as more serious, either</li> </ul>
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due to the nature of the offence or the vulnerability of the victim, detailed reasons will automatically be given for the decision not to prosecute and a meeting will be offered. In the event that the victim might query or disagree with the decision not to prosecute, the PPS will consider the following upon request:-

- Detailed reasons – Victims are entitled to request more detailed reasons for the no prosecution decision. The VWCU Case Officer will provide information on how these can be requested and will offer any assistance necessary. Where detailed reasons are requested, the PPS will consider what information about the decision may be provided, taking into account the interests of all parties and the facts and circumstances of the case.
- Where detailed reasons have been provided, but further explanation is required, the victim is entitled to ask for a meeting with the PPS to discuss the decision. The VWCU Case Officer will explain how to make a request and will offer any assistance necessary.
- Victims are also entitled to ask for a review of the decision not to prosecute after detailed reasons have been requested and/or received. Such requests should be made in writing within three months of the date the decision letter is received. If there are any difficulties with this, the VWCU Case Officer should be contacted. Once received, the

	<p>PPS will conduct a review of the decision.</p> <ul style="list-style-type: none"> <li>○ Finally, PPS also highlights the services of Victim Support NI in correspondence to the Victim in a No Prosecution decision. PPS provides information on how they can be contacted and enclose a VS leaflet. PPS will also make reference to the Victim Charter.</li> </ul>
<p>Some responses set out that victims should have the option to call upon organisations for assistance following police visits or after reporting a crime</p>	<p>Victim Support NI is funded by DoJ to ensure that support services are available to all victims of crime. These services include the provision of emotional support, advocacy, information and advice to victims; assistance with claiming Criminal Injuries Compensation; and ongoing help and support to witnesses. Once a crime has been reported, Victim Support NI is notified of victims by PSNI and they make contact with the victims to offer their services.</p> <p>In addition advocacy support is available for victims of certain types of offences and the strategy also makes provision for legal advice to be provided to complainants of serious sexual offences.</p> <p>The planned Needs Assessment Service set out under SP2 will also enhance the response to the evolving needs of victims of crime and sign post to available support services.</p>
<p>In welcoming the proposed measures some responses, particularly those from victims, emphasised the trauma of going through the criminal justice system and noted that its complexity can compromise the ability to provide best evidence.</p>	<p>We acknowledge the impact of the criminal justice system on victims and witnesses and the Minister has made clear that a priority for her in bringing forward this strategy is to minimise that potential for the system itself to retraumatise victims and witnesses.</p> <p>Further measures are included under SP4 to raise awareness of rights and entitlement under the charters and to improve information for victims. This includes the development of a digital information portal for victims and</p>



	witnesses which will aim to provide case specific information as well as general information to clarify and explain the criminal justice processes.
Responses also noted the need for emotional understanding and empathy in communicating with victims.	We recognise the importance of this. Work is well developed under SP3 to provide a trauma informed training framework – from a victim perspective - for the criminal justice system.
Comments under this Question also reiterated calls for a Homicide Service for Northern Ireland.	SP2 includes a commitment to consider how support services for families bereaved by homicide could be extended in 2023/24
Again, a number of respondents also highlighted needs around the availability of restorative practices	<p>Noted. We recognise the potential benefit of restorative practices to victims of crime.</p> <p>The strategy is aligned with the DOJ's Adult Restorative Justice Strategy. We also intend to take forward work to explore how best to further develop and ensure access to restorative justice opportunities for victims. We have revised SP1 to include an objective around restorative justice practices.</p>
Again, responses emphasised the need for appropriate resources for full delivery of the strategy.	<p>Noted and agree in principle. Any funding requirements for 2021-22 would be required to be considered as part of the in-year monitoring process alongside competing bids.</p> <p>As future year budgets are not yet set, funding for 2022-23 onwards would need to be considered as part of the future year budget process and the scale and pace of our delivery will be subject to available resources.</p>

## PROPOSAL:

Strategic Priority 3 Objectives (Embedding an increased organisational focus on victims and witnesses across the criminal justice system).

- Criminal Justice Organisations have an improved focus on the needs of victims and witnesses across the criminal justice system.
- Criminal Justice Organisations have increased awareness of, and consistently deliver, services and obligations under the Victim and Witness Charters.
- Criminal Justice Organisations address and strive for continuous improvement in responding to emerging issues and complaints received across the criminal justice system.

<b>Question A.8:</b>			
<i>Do you agree that these are the objectives under SP3 that we should be focused on in order to support delivery of the strategic aim?</i>			
<b>Total Responses</b> - 35	<b>Yes - 29</b>	<b>No - 1</b>	<b>Not answered – 5</b>
<b>Summary of comments</b>		<b>DOJ response</b>	
<p>There was broad support welcoming the objectives under SP3.</p> <p>One response set out that the wording of the objectives might unfairly suggest that criminal justice agencies were doing nothing to meet the needs of victims and witnesses and suggested that this objective should be framed in the context of continuous improvement.</p> <p>There were a number of other observations and comments</p>		<p>Noted – we acknowledge the work and arrangements already in place to meet the needs of victims and witnesses. This strategy is intended to build on and enhance in order to deliver further improvements to the experience for victims.</p>	
Some responses echoed previous comments made around victim-centric training		Noted and this is covered in the measures under SP3	
<p>Reponses also highlighted the need for access to specialist support, echoing earlier calls for collaboration with other departments and for legal support</p>		<p>We note that the needs of victims will differ according to their circumstance and level of vulnerability.</p> <p>Victim Support NI is funded by DoJ to ensure that support services are available to all victims of crime. These services include the provision of</p>	

	<p>emotional support, advocacy, information and advice to victims; assistance with claiming Criminal Injuries Compensation; and ongoing help and support to witnesses. Once a crime has been reported, Victim Support NI is notified of victims by PSNI and they make contact with the victims to offer their services.</p> <p>In addition advocacy support is available for victims of certain types of offences and the strategy also makes provision for legal advice to be provided to complainants of serious sexual offences.</p> <p>The planned Needs Assessment Service set out under SP2 will also enhance the response to the evolving needs of victims of crime and sign post to available support services.</p> <p>We will also engage with other Departments and organisations as appropriate on how we can work collectively with them to improve outcomes for victims and witnesses.</p>
<p>Some responses cautioned that the needs of <i>witnesses</i> may be overlooked more than those of victims.</p>	<p>Noted, SP3 and SP4 include measures that are intended to strengthen and improve the responses to victims and witnesses under both Charters.</p>
<p>One response noted the need for an improved focus on the specific needs of child victims and recommended engagement with young people when developing victim and witness policies.</p>	<p>Noted.</p> <p>The wording of our objective is intended to be inclusive of the needs of all victims and specific groups of victims.</p> <p>We intend to work through service and support providers and representatives of child victims to explore how best to engage young people on the development of relevant policies.</p>
<p>A number of responses raised issues about the victim and witness charters – some felt that the victims charter is too narrow – others welcomed initiatives to raise awareness of the charters but this work should embrace specific audiences</p>	<p>Noted</p> <p>We anticipate that one of the functions of victims of crime commissioner will be to review the adequacy and effectiveness of our laws and operational practices. We anticipate this</p>

	would include reviewing the adequacy of the victims charter
One response proposed that the criminal justice system focuses too much on results rather than the best interests of victims and witnesses	We recognise the need to focus on victims and witnesses.  This strategy aims to improve outcomes for victims and witnesses whilst also recognising the need for a fair and impartial justice system
One response suggested the introduction of a screening process for new policies (in the manner of equality screening) in order to ensure that victims and witness issues are considered when developing policy	Noted  We will consider and explore this proposal with operational partners through the victim and witness steering group
There was broad support welcoming the objectives, in particular welcoming the victims of crime commissioner and the victims champions	noted
Responses again noted the importance of resourcing	As noted earlier

#### Question A.9:

*Do you agree that the actions that we have proposed will help us to achieve these objectives?*

<b>Total Responses</b> - 35	<b>Yes - 29</b>	<b>No - 3</b>	<b>Not answered - 3</b>
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<b>Summary of comments</b>	<b>DOJ response</b>
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There was broad support for this objective.  A number of responses highlighted the need to tackle delay and that the strategy needed to be aligned with the department's work to reduce delay in the criminal justice system	Noted  We acknowledge the significant impact that delay within the criminal justice system has on victims and witnesses.  The strategy sets out the wider strategic framework which includes priority work which the Department is leading to speed up justice and reduce delay in the criminal justice system. <b>We have revised the opening chapters of the strategy to include more detailed information on the current programme of work to reduce delay.</b>
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<p>Some responses again called for collaboration across government departments and that other departments should be subject to the victims charters and the remit of the VCC</p>	<p>Noted.</p> <p>Partnership is an underpinning principle to the delivery of this strategy. The Victim and Witness Charters set out the responsibilities of criminal justice organisations. We will also engage with other Departments and organisations as appropriate on how we can work collectively with them to improve outcomes for victims and witnesses.</p>
<p>One response asked for clarification of the relationship between the victims champions and the proposed Victims of Crime Commissioner</p>	<p>Victims' champions have been appointed as senior leaders within CJOs in order to provide leadership within their own organisations towards a greater focus on victims and witnesses in the delivery of their functions.</p> <p>The Victims of Crime Commissioner is intended to be independent of government and to carry out a number of functions including promoting good practice, reviewing the adequacy of operational practice, championing the delivery of entitlements under the victims' charter and challenging and making recommendations to the DOJ and relevant agencies.</p> <p>It is for the Victims of Crime Commissioner to determine how best to carry out these functions however we would anticipate that in doing so they would be engaging with the victims champions as leaders within those organisations</p>

**PROPOSAL:**

- Strategic Priority 4 Objectives (Ensuring victims and witnesses receive the services and information they need and are entitled to).
- Victims and witnesses can consistently access their rights under the Victim and Witness Charters.
- Victims and witnesses know how and where to complain or seek redress.
- Effective processes are in place to ensure that victims and witnesses receive timely and accurate information relevant to their specific case.

**Question A.10.**

*Do you agree that these are the objectives under SP4 that we should be focused on in order to support delivery of the strategic aim?*

Y/N

**Total Responses**  
- 35

**Yes – 29**

**No - 3**

**Not answered - 3**

**Summary of comments**

**DOJ response**

Again there was broad support for the objectives under SP4, with most responses acknowledging that measures to raise awareness of the Charters and to support victims and witnesses in making complaints were critical.

A number of other comments, observations and recommendations were made, many echoing the themes that have been prevalent throughout responses to other parts of the consultation.

One response called for a further commitment to strengthen and advance the rights and protections for victims, also citing that victims should be afforded participatory rights within the criminal justice system.

Our priority in developing SP4 has been to focus on consistent delivery of the existing entitlements under the Victim and Witness Charters. We believe that this priority is the right one to focus on.

However we do also want to explore where it is possible and appropriate to strengthen and advance the rights and protections available to victims and witnesses where this is appropriate and where it can be achieved without compromising the principle of an impartial and fair justice system.

We believe that there are a number of measures within the strategy that are already helping to achieve this and to enhance victims' participatory rights within the criminal justice system. New initiatives include the provision of remote evidence facilities for vulnerable and child witnesses and the provision of

	<p>legal advice for complainants in sexual offence cases.</p> <p>In addition we have commenced work to consider not only how to improve the provision of information to victims and witnesses, but also to explore whether the criminal justice system is providing sufficient information.</p> <p>We have also included measures to raise awareness of the Charters in order to ensure that victims and witnesses are aware of and able to access their existing rights, including rights such as the ability to make a Victim Impact Statement.</p> <p>We also intend to take forward work to explore how best to further develop and ensure access to restorative justice opportunities for victims. We have revised SP1 to include an objective around restorative justice practices.</p> <p>Fundamentally, one of the proposed functions of the Victims of Crime Commissioner is to review the effectiveness of the adequacy and effectiveness of our laws and practices - including the Victims Charter - and to make recommendations for improvement.</p>
<p>One response highlighted that the Victim and Witness Care Unit is critical.</p>	<p>Noted.</p> <p>We acknowledge the pivotal role that the Victim and Witness Care Unit has to play in ensuring that victims and witnesses are informed. SP2 includes measures to develop a new service model that will integrate a Victim and Witness Needs Assessment Service within the Victim and Witness Care Unit to ensure enhanced provision of care.</p>
<p>Again several responses highlighted previous shortcomings with the provision of information to victims and saw this as a key area for improvement. Responses noted the need for sufficient, timely, consistent and clear information in accessible language and</p>	<p>Agree.</p> <p>There is already provision in place to signpost victims to support, a number of the measures under the strategy will enhance this provision.</p>

<p>added that information should include signposting to support services.</p>	<p>The development of the new service model for the Victim and Witness Care Unit under SP2 is intended to help enhance the provision of both information and care to victims and witnesses.</p> <p>In addition SP4 includes a number of measures that seek to enhance the provision of information to victims including the establishment of a dedicated information sub-group to review current procedures and identify opportunities for improvement; and work to develop a digital information portal which would allow victims and witnesses to access relevant case-specific information.</p> <p>We also envisage a role for the Victims of Crime Commissioner in reviewing the effectiveness of existing law and operational practices, which may also identify further opportunities for improvement.</p>
<p>Most responses were highly supportive or measures to raise awareness of the Charters, with a number calling for other Departments to be subject to the Charters.</p>	<p>Noted.</p> <p>We will also engage with other Departments and organisations as appropriate on how we can work collectively with them to improve outcomes for victims and witnesses.</p>
<p>Complaints was also a recurring theme with respondents highlighting the need for better support in making a complaint and clarity on the processes, whilst also noting the opportunities to learn and improve from the complaints process and the role for the Victims of Crime Commissioner within this.</p>	<p>Agree.</p> <p>We recognise the need to learn about addressing complaints.</p> <p>SP4 intends to make it easier by assisting victims to make complaints but also assist the criminal justice system in identifying and responding to issues and trends emerging through the complaints process. This includes the establishment of a Victims of Crime commissioner, who will be able to help direct complaints, but will also have an overview of complaints across the system and therefore will have a role in identifying emerging themes and issues to address...</p>



<p>Some comments reiterated the need to provide opportunities for victims to access restorative practices.</p>	<p>Agreed, as noted previously we also intend to take forward work to explore how best to further develop and ensure access to restorative justice opportunities for victims. We have revised SP1 to include an objective around restorative justice practices.</p>
<p>Responses also raised concerns about the need to reduce delay within the criminal justice system.</p>	<p>Noted. We recognise the huge impact that delay can have on victims and witnesses.</p> <p>Whilst we have not included any specific measures to reduce delay within the objectives of this strategy, we have set out the wider strategic framework which includes a significant programme of priority work which the Department is leading to speed up justice and reduce delay in the criminal justice system.</p> <p><b>On the basis of consultation responses we have revised the opening chapter of the strategy to include more detailed information on the current programme of work to reduce delay.</b></p>
<p>A number of responses, in particular those from victims, raised issues around sentencing.</p>	<p>We acknowledge the keen interest in sentencing and the level of confusion that sentencing can cause.</p> <p>SP4 includes a commitment to put in place measures to raise public awareness and understanding of sentencing.</p> <p><b>In addition we have included a new section in the opening chapters of the strategy setting out more information on the programme of work that the Department is leading following a recent consultation on the Sentencing Policy Review, to increase transparency and understanding of sentencing and to ensure a robust sentencing framework.</b></p>

<b>Question A.11:</b>			
<i>Do you agree that the actions that we have proposed will help us to achieve these objectives?</i>			
Y/N			
<b>Total Responses</b> - 35	<b>Yes – 30</b>	<b>No - 2</b>	<b>Not answered - 3</b>
<b>Summary of comments</b>		<b>DOJ response</b>	
<p>Again, almost all respondents strongly welcomed the proposed measures set out under SP4. Where respondents did not agree this was generally a call for additional or enhanced measures, rather than a rejection of the measures already included.</p> <p>Additional observations and recommendations largely echoed those made in relation to the SP4 objectives at Question A10 (above).</p>			
<p>Similar issues were raised about the need for consistent, clear and sufficient information to and communication with victims and witnesses.</p>		<p>Noted and this is a priority for us.</p> <p>The development of the new service model for the Victim and Witness Care Unit under SP2 is intended to help enhance the provision of both information and care to victims and witnesses.</p> <p>In addition SP4 includes a number of measures that seek to enhance the provision of information to victims including the establishment of a dedicated information sub-group to review current procedures and identify opportunities for improvement; and work to develop a digital information portal which would allow victims and witnesses to access relevant case-specific information.</p>	
<p>One respondent again called for work to enhance the Victim and Witness Care Unit</p>		<p>We agree this will help to enhance delivery of SP4. There is already a commitment under SP2 to develop a new service model that will integrate a Victim and Witness Needs Assessment Service within the Victim and Witness</p>	

	Care Unit to ensure enhanced provision of care.
There were further calls to provide opportunities for victims to access restorative practices.	Agreed, as noted previously we also intend to take forward work to explore how best to further develop and ensure access to restorative justice opportunities for victims. We have revised SP1 to include an objective around restorative justice practices.
Plans to develop the 'My Justice Journey' digital information portal were widely welcomed, with one respondent noting that not all victims may be able to easily access the internet.	Noted.  We would clarify that My Justice Journey is intended to enhance information provision and allow a greater degree of autonomy for victims and witnesses to proactively access case-specific information. However it is not intended to replace existing processes for communicating with victims and witnesses, which we also seek to improve through this strategy.
Work to raise awareness of the Charters was also welcomed with additional comments noting the need to ensure that these are accessible. One respondent noted the existing 'easy read' versions but also suggested the use of explanatory videos and other media. One respondent also recommended that the content of the Charters should be subject to regular review.	We agree that the Charters need to be accessible to all.  Some progress has already been made (such as the easy read version; we have also worked with VSNI to promote VSNI's accessible animated video on the Victims Charter). We will wish to explore wider use of different media platforms as well as ensuring accessibility.  On reviewing the content of the Charter, as noted, one of the proposed functions of the Victims of Crime Commissioner is to review the effectiveness of existing law and operational practices – including the Victims Charter.
One respondent recommended that more should be done to strengthen and enhance Victim Personal Statements	SP4 includes a measure to develop a plan to increase awareness of the availability of Victim Impact Statements and how to make one. In implementing this measure we will ensure that victims are better informed on the purpose of the Victim Impact Statement and how we can best support victims to make one.

**PROPOSAL:**

Implementation of the draft strategy should be underpinned by a principle of working in partnership.

<b>Question A.12:</b> <i>Do you agree that the effective implementation of this strategy should be underpinned by the principle of working in partnership?</i> Y/N			
Total Responses	Yes – 31	No - 1	Not answered - 3
Summary of comments		DOJ response	
There was strong support for the principle of partnership.			
The only response which disagreed did so on the perception that the role of the Victim and Witness Care Unit was overlooked in the strategy		We disagree with this assessment of the strategy.  The Victim and Witness Care Unit provides a key operational partnership under the strategy and indeed, SP2 includes measures for the development of a new VWCU service model, including the addition of a new integrated Needs Assessment Unit, which will see VSNI staff collocated within the VWCU with PPS and PSNI. Work to develop this new service model is well advanced.	
Themes that had been prevalent in responses to other questions were also raised in relation to partnership, with some responses noting restorative practices as an important element of partnership working.		Agreed, as noted previously we also intend to take forward work to explore how best to further develop and ensure access to restorative justice opportunities for victims. We have revised SP1 to include an objective around restorative justice practices.	
Responses highlighted that the benefits of co-design		Noted.  In developing this strategy we have been informed by victim and witness feedback and have worked closely with victim and witness representatives who are members of the Victim and Witness Steering Group.  Victim representatives are also key delivery partners across the strategy.	

	In developing further work and projects under the strategy we will endeavour to engage victims and witnesses to help inform our thinking and the development of options and solutions (e.g., within the development of My Justice Journey)
Some responses noted the potential of IT to support greater collaboration and communication across agencies as well as the need for agencies to work collaboratively to gather and analyse data.	Noted and we are taking steps to adopt such collaborative approaches, particularly in the evaluation of work under this strategy.
Again responses highlighted the need for partners to be appropriately resourced to support delivery of the strategy.	Noted and agree in principle. Any funding requirements for 2021-22 would be required to be considered as part of the in-year monitoring process alongside competing bids.  As future year budgets are not yet set, funding for 2022-23 onwards would need to be considered as part of the future year budget process and the scale and pace of our delivery will be subject to available resources.

**Comments not aligned to specific questions:**

<b>Summary of comments</b>	<b>DOJ response</b>
Strategy needs to recognise that some victims can also be offenders who have specific needs which also need to be met improvement across the criminal justice system	Noted.  We acknowledge the point about this overlap in relation to some victims. As noted within the opening sections, this strategy sits within and is aligned to a wider strategic framework including ongoing work by NIPS, Youth Justice Agency and PBNI with offenders, including offenders who are also victims of crime. For example, within NIPS this issue is recognised by providing counselling or support from organisations such as, for example, Nexus and Women's Aid. Often this support work has to take place before the individual addresses his/her own offending behaviour.
One response asked for clarification on funding of the proposed Strategy, as	Noted.

<p>this is not contained within the consultation document. It is not clear whether the Strategy will be specifically allocated funding or whether it will be resourced through the Department's existing resources. The Commission would suggest that for the Strategy to be successful it is allocated with sufficient and ongoing dedicated resources.</p>	<p>Any funding requirements for 2021-22 would be required to be considered as part of the in-year monitoring process alongside competing bids.</p> <p>As future year budgets are not yet set, funding for 2022-23 onwards would need to be considered as part of the future year budget process and the scale and pace of our delivery will be subject to available resources.</p>
<p>The same respondent noted the risk of intimidation of witnesses and recommended that witness rights are upheld and effective witness protection strategies developed.</p>	<p>PPS and PSNI have provided a response to this comment.</p> <p>The PPS advised that it recognises the need for a partnership approach to ensure the victims and witnesses are listened to regarding their particular circumstances and needs. This is particularly important in order to ensure that witnesses are able to give their best evidence without fear or threat or reprisal. Consideration of special measures for those witnesses that fall under the "intimidated" or "vulnerable" categories, as well as use of Witness Anonymity Orders, are two very useful tools in the prosecutor toolkit.</p> <p>PSNI also noted the need for a partnership approach and advised that the Police Service works closely with Criminal Justice partners and Victims' groups to ensure that robust measures are in place which provide the required level of protection, support and assistance to vulnerable and intimidated witnesses. This ensures that witnesses are able to give their best evidence without fear or threat of reprisal and with the required special measures in place as applicable to each case.</p>
<p>A number of responses highlighted issues around the specific needs of children, with one suggesting that the</p>	<p>The strategy is intended to be inclusive of the needs of all victims and specific groups of victims and witnesses, including children.</p>

voice of children and young people had not been reflected in the strategy.

Specific provision is already in place for victims and witnesses who are children. The strategy reflects and has been informed by a number of key reports and surveys which have reflected the experiences and needs of child victims and witnesses and their representatives.

NSPCC is a member of the Victim and Witness Steering Group and has been involved in the development of the strategy. In addition, as we progress work-streams under the strategy we intend to work further service and support providers and representatives of child victims, such as NSPCC and others, to explore how best to engage young people on the development of relevant policies.

### Minister's meeting with Reference Group

On 22 June 2021, the Minister also met members of the Reference Group that had been originally set up to help shape proposals for the establishment of the Victims of Crime Commissioner to discuss the consultation paper in more detail. The key points from the discussion on Section A were:

- overall, there was broad support for the new draft Strategy and members agreed that the proposals outlined were positive;
- members agreed that listening to the experiences of victims and witnesses was vital to shape the Strategy;
- it was important to ensure that victims and witnesses understand that they have specific rights; and
- high priority should be given to raising awareness of the Victims Charter so that those affected by crime know the standard of support that they can expect to receive and where to go to get support.

These comments broadly reflect the points raised in consultation responses to which the Department has set out its position above.



## 5. Section A – A New Draft Strategy: Analysis and next steps

- 5.1 A total of 35 responses were received in relation to this part of the consultation and these included some composite responses reflecting the views of stakeholders.
- 5.2 Overall there was strong support for all of the proposals, with a number of additional specific recommendations, which the Department has already responded to in detail in the Section 4 of this Report.
- 5.3 The recurring themes across most responses and against most questions included:
- the need for appropriate resourcing;
  - the need for better, clear, sufficient and consistent provision of information for victims;
  - calls for the strategy to include provision for restorative practice for victims;
  - concerns raised about complaints;
  - calls for participatory rights for victims;
  - the need for the strategy to address both delay and sentencing;
  - a recommendation that we define what is meant by victims and witnesses under the strategy; and
  - calls for the Charters to go farther and for their remit to extend to other Departments.
- 5.4 Each of themes is addressed in detail in the above section. Following our analysis of the responses we believe that in most cases the strategy includes measures developed to address the point being raised and therefore that no further revision is required. In a number of cases, the issue raised is currently being met under separate programmes of work and where this is the case we have made some revisions to the opening narrative of the strategy in respect of the **wider strategic framework** to highlight this work explicitly.

## *Revisions*

5.5 A copy of the final **revised strategy**, is attached and will be published. For ease of reference, a summary of the revisions which have been incorporated as a result of the consultation exercise is set out below:

### *Opening narrative chapters of the strategy:*

- we have included definitions of victims and witnesses for the purposes of the strategy. These are in line with the meaning of victim attributed under Article 2 of directive 2012/29/EU of the European Parliament and of the Council; and the meaning of witness attributed by section 30(9) of the Justice Act (Northern Ireland) 2015. These mirror the definitions that CJINI used in its June 2020 report;
- we have included explicit reference within the “wider strategic framework” section to existing child protection and safeguarding arrangements and clarified that any of the strategy’s measures in relation to children are aligned to these arrangements;
- we have also made explicit references within the “wider strategic framework” section to the draft “Empowering Change in Women’s Lives’ A Strategy for supporting and challenging women and girls in contact with the justice system” and to work to implement recommendations flowing from Judge Marrinan’s Hate Crime Review;
- we have included a further revision within the same section to reflect that the strategy is aligned with our human rights obligations, and to reflect explicitly the Attorney General’s human rights guidance in respect of victims;
- we have included a new detailed sub-section to the wider strategic framework which acknowledges the impact of delay on victims and witnesses and sets out in more detail the programme of work that is currently being progressed to reduce delay in the criminal justice system; and
- similarly we have included an additional subsection which also acknowledges victims’ interests in sentencing and sets out in greater

detail the ongoing work to implement recommendations flowing from the Department's consultation on the Sentencing Policy Review.

Mission Statement:

- A few responses raised issues about the mission statement – including that it should better manage expectations to clarify that this is an ongoing aspirational mission statement and to clarify that a greater focus on victims should still be balanced against the principle of a fair and impartial justice system. We have revised the mission statement to read “**Working to ensure that victims and witnesses are central to a criminal justice system which ensures the fair administration of justice**”.

Strategic Aim:

- In response to suggestions, we have also revised the strategic aim to clarify that the strategy is intended to cover all victims of crime (including those who may also be offenders). The strategic aim now reads “**Supporting all victims and witnesses and improving their experience of the criminal justice system**”, with the addition of the word “all”.
- There were a number of other suggestions aimed at further strengthening the strategic aim. We have resisted these on the basis that in developing the strategy we have sought to set a challenging and ambitious *yet still achievable* strategic aim and a realistic programme of work. We are confident of our ability to deliver against this strategic aim but would wish to avoid further revisions which we are not confident that we can achieve.

4 Strategic Priorities:

- There were a few recommendations to revise the four strategic priorities which we resisted as we believed they were not appropriate as strategic priorities, but instead would be best addressed by related revisions to some of the actions and measures:

- one response recommended an additional strategic priority around the development of restorative practices. We have not included this as a 4<sup>th</sup> priority but have revised the actions under SP1 to include a measure around the development of restorative practices;
- another response recommended revisions to SP4 to go beyond the current wording of ensuring victims and witnesses receive the services and information they need and are entitled to include a focus on ***strengthening and advancing the rights of victims and witnesses***. We have resisted this suggested revision but noted in the consultation report that we believe the existing wording of the priority is right to focus first on *compliance* with consistent delivery of existing rights and entitlements whilst emphasising that we do also want to explore how we might strengthen and advance the rights and protections available to victims and witnesses *where this is appropriate and where it can be achieved without compromising the principle of an impartial and fair justice system*. The response also sets out the measures within the strategy that are already helping to achieve this.

#### SP2 Objectives and Actions

- One response recommended that the wording of the objective of providing practical support to achieve best evidence should be revised to be more victim-focused. We have accepted this and the revised objective now reads “***Victims and witnesses receive practical support to give best evidence in a manner that minimises trauma***”

#### *Resourcing*

5.6 Resourcing has been a key theme that respondents have highlighted in respect of both the strategy and proposals for a Commissioner, with most respondents noting that to be effective the proposals need to be adequately resourced. Affordability and value for money have been key factors in developing the strategy and these will continue to inform how we take forward implementation. However, future year budgets are not yet set and therefore funding for 2022/23 onwards will need to be considered as part of the future year budget process and the scale and pace of delivery against the strategy

will be determined by the funding available under future Departmental budget allocations.

## 6. Section B -The Establishment of a Victims of Crime Commissioner: Summary of responses and comments

### PROPOSAL:

The Minister of Justice is proposing to establish a Victims of Crime Commissioner for Northern Ireland. Initially this office would take the form of a Victims of Crime Commissioner *Designate* until legislation can be taken forward for a statutory Victims of Crime Commissioner.

<b>Question B.1:</b>			
<i>Do you support the creation of a Victims of Crime Commissioner to help represent and drive improvements to the outcomes and experiences of victims of crime? Y/N</i>			
<b>Total Responses -</b> 30	<b>Yes - 27</b>	<b>No - 0</b>	<b>Not answered - 3</b>
<b>Summary of comments</b>		<b>DOJ response</b>	
<p>The vast majority of responses were in favour of the establishment of a Victims of Crime Commissioner who they thought would drive improvements for victims, as well as addressing the perception some hold that the criminal justice system prioritises defendants over victims.</p> <p>A number of other observations and suggestions were made.</p>			
<p>One response suggested that the role should also include ensuring that the needs of the victims are met in addition to representing and driving improvements to the outcomes and experience of victims of crime.</p>		<p>Noted.</p> <p>The Victim Charter sets out the various responsibilities that fall of statutory agencies to meet the needs of victims and it is not intended that the Commissioner should duplicate this existing provision.</p> <p>However, the Commissioner will be required to take steps to understand the needs of victims in order to inform how they fulfil their functions effectively.</p>	

<p>Whilst supportive of the proposal, others indicated that they believed the Commissioner should have a wider remit – for example, supporting victims of low level crime, link with the Mental Health Champion and other Commissioners, reach into the Domestic Abuse legislation and help inform how sentencing failures fail victims.</p>	<p>Noted.</p> <p>We agree that the Commissioner will have an important role.</p> <p>The Commissioner is intended to represent ALL victims of crime, however, within that remit they will have the scope to identify their own strategic priorities, based on their assessment of victims’ needs.</p> <p>However, the role is not intended to duplicate the work of victim support organisations in supporting victims.</p> <p>We recognise the potential benefits of working with other Commissioners where that is appropriate, including the Mental Health Champion and this has been included in the consultation document.</p> <p>We have also proposed that the Commissioner should provide a focus on Domestic and Sexual Abuse victims, as well as identifying where the system is failing victims and driving forward systemic improvements.</p>
<p>One response queried whether there might be scope to share back office functions with other commissioners to save on resources.</p>	<p>We note this suggestion and had previously considered this but concluded that it is not feasible option at this time.</p>
<p>One response signalled a continuing campaign for a dedicated Domestic Abuse Commissioner.</p>	<p>Noted – however as previously indicated, the Minister has concluded that a Victims of Crime Commissioner with a specific focus on Domestic and Sexual Abuse victims is a more effective use of limited resources.</p>
<p>The issue of resourcing was raised by some respondents. One respondent mentioned that it should not be a drain on the taxpayer.</p>	<p>Noted.</p> <p>Affordability and value for money are both key factors in establishing the role.</p> <p>As future year budgets are not yet set, funding for 2022-23 onwards would</p>

	<p>need to be considered as part of the future year budget process.</p> <p>Therefore the level of policy and administrative support that will be provided to the Commissioner will be subject to available funding through future Departmental budget allocations. In taking forward the appointment the Minister has indicated that the Commissioner Designate's role in scoping out the role and powers for the statutory Office should be prioritised.</p>
<p>One response indicated that it would be preferable if the Commissioner Designate has on the ground, first- hand experience of victims of hate crime as well as a legal knowledge and experience.</p>	<p>Noted.</p>
<p>One response said that it was important that the role was not used by DoJ as a way to avoid difficult decisions or delegating decisions which are to be taken by the Executive.</p>	<p>Noted – this is not the intention in establishing the role.</p>
<p>A number of respondents emphasised the need to be independent and to be able to challenge DoJ and wider criminal justice system and help promote best practice, whilst also noting the need to have a solid understanding and a good working relationship with criminal justice organisations.</p>	<p>Accepted and in line with the proposed functions.</p>
<p>Some respondents highlighted that the role should be supported by legislative powers on holding departments and statutory organisations to account.</p>	<p>Noted – The consultation sets out that we are not in a position to legislate within this mandate. However the Department intends to legislate for a statutory Victims of Crime Commissioner in the next mandate.</p>
<p>One response proposed that ensuring Restorative Practice is a core option for victims should be a core task for the Victims of Crime Commissioner Designate.</p>	<p>Noted.</p> <p>Whilst we do not believe that this function should fall to the Commissioner, we would clarify that we have revised the Victim and Witness</p>



	Strategy to include a commitment around restorative justice practices.
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## PROPOSAL:

The Minister of Justice is proposing that the role and functions of a Victims of Crime Commissioner should be to:

- provide a voice for all victims of crime;
- identify, promote, encourage and issue guidance on good practice;
- review the adequacy and effectiveness of law and practice;
- review the operation and delivery of Charter entitlements;
- promote the Victim Charter;
- direct complaints and monitor outcomes;
- advise and make recommendations; and
- undertake or commission research.

<b>Question B.2:</b>			
<i>Do you agree that these are the appropriate role and functions to meet the gaps/weaknesses and improve how victims of crime are treated within the criminal justice system? Y/N</i>			
<b>Total Responses -</b> 30	<b>Yes - 23</b>	<b>No - 2</b>	<b>Not answered - 5</b>
<b>Summary of comments</b>		<b>DOJ response</b>	
Again, the vast majority of responses were supportive of the proposed role and functions.  A number of other observations and suggestions were made.			
A number of responses highlighted that victims' needs should be central to decision making.		Accepted - understanding the needs of victims is fundamental for the Victims of Crime Commissioner Designate and will inform all areas of their remit.	
Others highlighted the need for research: <ul style="list-style-type: none"> <li>• to reflect the racial/ethnic/faith/</li> </ul>		Noted – This reinforces the proposed functions which include undertaking or commissioning research. The research to be undertaken will be decided by the	

<p>gender background of victims.</p> <ul style="list-style-type: none"> <li>• on under-represented groups and how they are affected by crime.</li> <li>• on the current experience of victims to identify gaps.</li> </ul>	<p>Victims of Crime Commissioner Designate.</p>
<p>Some responses raised concerns that the wide remit could lead to a hierarchy of victims.</p>	<p>Noted.</p> <p>This is certainly not the intended outcome. Whilst we intend that the Commissioner should have a specific role in relation to some particularly vulnerable groups of victims, the overall remit is to represent <u>all</u> victims of crime. Within that remit, it will be for the Commissioner to identify their strategic priorities.</p>
<p>Other responses raised concerns that the role is too narrow, with some also proposing that the scope should not be limited to the justice sector.</p> <p>A number highlighted that there should be scope to work with other Commissioners as well as the possibility of working with CJINI.</p>	<p>Noted.</p> <p>The proposed role has been informed by the Reference Group's analysis of the gaps in existing provision. Working within their remit, it will be for the Commissioner to identify their strategic priorities.</p> <p>Our priority in establishing the Commissioner has been to drive improved outcomes for victims of crime and we anticipate their primary focus will be on the criminal justice system. However we recognise that the needs of victims extend beyond the justice system and so, subject to the Commissioner's own identified priorities, recognise that there is scope within the role to work with other commissioners where there are shared interests and to comment on the roles of other relevant Departments on victim issues. However in establishing the Commissioner we have been clear that we want to avoid any unnecessary duplication of roles or functions.</p>
<p>A number of responses highlighted the need for the Commissioner to</p>	<p>Noted.</p>

<p>understand the experience of victims and be fully informed of the issues. Some specifically noted the need to listen to victims and to professionals; others that the victim's voice should relate to need and necessity. One response also called for a Victims' Forum to be established.</p>	<p>We recognise the need for the Commissioner to engage with victims and their representatives as well as being informed by up to date research.</p> <p>We have proposed that the Commissioner should also establish an Advisory Group. It will be for the Commissioner to identify their strategic priorities and to consider the establishment of a Victims' Forum.</p>
<p>A number of responses noted that it is essential that there are sufficient resources to deliver on the functions.</p>	<p>Noted and agreed in principle.</p> <p>As future year budgets are not yet set, funding for 2022-23 onwards would need to be considered as part of the future year budget process.</p> <p>Therefore the level of policy and administrative support that will be provided to the Commissioner will be subject to available funding through future Departmental budget allocations. In taking forward the appointment the Minister has indicated that the Commissioner Designate's role in scoping out the role and powers for the statutory Office should be prioritised.</p>
<p>Some respondents commented that it is essential that the role has power not only to challenge Government but to hold it to account.</p>	<p>Noted.</p> <p>As the consultation notes, there is no capacity to legislate for statutory powers within this mandate, however as the Minister has indicated, our intention is to bring forward legislation to put the Commissioner on a statutory footing in the next mandate,</p> <p>As such the Commissioner Designate will not have statutory powers. However the nature of the role is intended to be public and therefore will carry significant influence both to challenge and to hold to account publicly.</p>

<p>A number of responses commented on the Commissioner's role in relation to the Victim and Witness Charters, including that the role should have the power to monitor data collection re compliance and urge redress when systematically failing and there should be scope to review the Charters.</p>	<p>Noted. Ensuring compliance of the Charter is a key function and will likely include consideration of the data currently collected, as this will feed into the monitoring exercise. While the current proposal is for the role to review the operation and delivery of the Charter, any future review of the Charter could consider involvement of the Victims of Crime Commissioner.</p>
<p>One response noted that there should be a specific role in relation to agencies working with offenders, who often are victims.</p>	<p>Noted. The Commissioner is intended to represent all victims of crime, including those who are also offenders and so the Commissioner's role would extend to work by NIPS, Youth Justice Agency and PBNI (etc.) in this capacity.</p>
<p>The Commissioner should be available to families of murder victims.</p>	<p>Accepted – The Commissioner is intended to represent all victims of crime, including families of murder victims, in line with the definition of 'victim' under the Victim Charter.</p>
<p>One response sought clarification on the Commissioner's role in relation to complaints about the criminal justice system.</p>	<p>Our intention is that the Commissioner should have a role in helping to direct complaints from victims to the appropriate agency, acknowledging that existing complaints processes are already in place and that individual criminal justice organisations should be afforded the opportunity to investigate and respond to complaints in the first instance and also noting the need to avoid duplication of Ombudsman functions.</p> <p>However, we also recognise that complaints provide an important insight into potentially systemic issues that need to be addressed. As such we also intend that the Commissioner will be able not only to direct complaints, but also to overview and monitor how they</p>

	are dealt with by criminal justice organisations.
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<b>Question B.3:</b>	
<i>Is there anything that you think should be added to or removed from the role and functions outlined and if so, please explain why?</i>	
<b>Total Responses - 30</b>	<b>Comments provided - 10</b>
<b>Summary of comments</b>	<b>DOJ response</b>
Again there was strong support for the proposed approach, with a number of additional comments raised.	
One response suggested that specialist support and considerations for victims from minority groups should be integrated into each of these functions.	We note the suggestion and would clarify that the Commissioner role is not intended to duplicate the work already provided by victim support organisations.  However the Commissioner is intended to represent <b>all</b> victims of crime, including victims from minority groups.
Engagement with the voluntary and community sector was raised by some respondents.	Noted.  We recognise the need for the Commissioner to engage with victims and their representatives within the voluntary and community sector.  We have proposed that the Commissioner should also establish an Advisory Group.
There should be a commitment to look at the national dataset in relation of specific crimes including violence against women and girls.	Noted. We anticipate that the Victims of Crime Commissioner will need to consider information from a range of relevant sources to inform their work.
There could be inclusion of an oversight function on the delivery of policy plans and recommendations re delivery of recommendations of the Marshall Report, Gillen Review and Implementation Plan.	Noted.  There are already oversight processes in place for regular reporting on delivery against reports and recommendations. We acknowledge that the Victims of Crime Commissioner is likely to be

	<p>interested in the delivery, however we believe that this would fall under proposed functions of “reviewing the adequacy and effectiveness of our laws and operational practices” and of providing a challenge function to the Minister and criminal justice organisations.</p>
<p>The law for victims needs to change and the law for serious crime needs to become more severe.</p>	<p>Noted.</p>
<p>There should be power for cross departmental monitoring and the ability to compel evidence and responses from Departments and agencies.</p>	<p>As the consultation notes, there is no capacity to legislate for statutory powers within this mandate, however as the Minister has indicated, our intention is to bring forward legislation to put the Commissioner on a statutory footing in the next mandate,</p> <p>As such the Commissioner Designate will not have statutory powers. However the nature of the role is intended to be public and therefore will carry significant influence both to challenge and to hold to account publicly.</p> <p>As previously noted, there is scope within the role to work with other commissioners where there are shared interests and to comment on the roles of other relevant Departments on victim issues. However in establishing the Commissioner we have been clear that we want to avoid any unnecessary duplication of roles or functions.</p>
<p>Monitoring and compliance should be linked with CJINI and have ‘teeth’ – recommendations enforced.</p>	<p>Noted.</p> <p>The Victims of Crime Commissioner Designate is not to duplicate the work of CJINI, but we believe there would be scope to work with CJINI on issues relating to victims, where there are shared interests.</p>

<p>Inclusion of Restorative Practice/Justice approach was mentioned by a couple of respondents.</p>	<p>Noted</p> <p>We recognise the value of restorative justice practice for victims and whilst we do not believe that delivery of these practices should be a function of the Commissioner, we would clarify that we have revised the Victim and Witness Strategy to include a commitment around restorative justice practices.</p>
<p>Some responses suggested a potential advocacy role.</p>	<p>Noted,</p> <p>The policy intent is for the Commissioner to provide a voice for all victims of crime but does not include an advocacy role for individual cases. However we acknowledge that there may be certain cases which the Commissioner might wish to refer to in order to exemplify or highlight systemic issues that need to be addressed.</p>
<p>Legislative powers was raised by a number of respondents including one respondent recommending that the Commissioner should have statutory powers to initiate/intervene in legal matters and have legal/investigatory powers.</p>	<p>As noted there is no capacity to legislate for statutory powers within this mandate, however as the Minister has indicated, our intention is to bring forward legislation to put the Commissioner on a statutory footing in the next mandate, As such the Commissioner Designate will not have statutory powers.</p> <p>However, it is worth clarifying that it is <u>not</u> our policy intent that the Commissioner should have an advocacy role in individual cases.</p>
<p>Some consultation responses again proposed a wider remit beyond criminal justice.</p>	<p>Again, as noted previously, the proposed role has been informed by the Reference Group's analysis of the gaps in existing provision. Working within their remit, it will be for the Commissioner to identify their strategic priorities.</p> <p>Our priority in establishing the Commissioner has been to drive improved outcomes for victims of crime</p>

	and we anticipate their primary focus will be on the criminal justice system. However we recognise that the needs of victims extend beyond the justice system and so, subject to the Commissioner’s own identified priorities, recognise that there is scope within the role to work with other commissioners where there are shared interests and to comment on the roles of other relevant Departments on victim issues. However in establishing the Commissioner we have been clear that we want to avoid any unnecessary duplication of roles or functions.
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**PROPOSAL:**

The Minister of Justice is proposing that the remit and focus of a Victims of Crime Commissioner should be to represent all victims of crime and be independent from government, but that the role should include a particular focus on victims of domestic and sexual abuse and hate crime.

<b>Question B.4:</b>				
<i>Do you agree with the proposal that, in addition to their remit to represent all victims of crime, the Victims of Crime Commissioner should also be tasked and resourced to provide a focus on particularly vulnerable groups of victims, specifically:</i>				
<i>Victims of domestic and sexual abuse? Y/N</i>				
<i>Victims of hate crime? Y/N</i>				
<b>Total Responses</b> - 30				
<b>Victims of D&amp;SA</b>	<b>Yes – 23</b>	<b>No - 1</b>	<b>Yes and No - 2</b>	<b>Not Answered - 4</b>
<b>Victims of HC</b>	<b>Yes - 21</b>	<b>No - 1</b>	<b>Yes and No - 2</b>	<b>Not Answered - 6</b>
<b>Summary of comments</b>			<b>DOJ response</b>	



<p>There was broad support for this proposal, although several responses were more mixed.</p>	
<p>A number of responses raised concerns about the need to not create a hierarchy of victims.</p> <p>Some agreed the proposed focus on victims of domestic and sexual abuse and of hate crime – it was noted that it was not the right time to establish a number of additional Commissioners - but emphasised that this should not be at the expense of victims of other crimes.</p> <p>Others elaborated on this point saying the Commissioner needs to maintain a broad mandate across all areas of victims’ rights – no hierarchy of victims.</p> <p>Other responses highlighted other areas that the Commissioner should cover, including:</p> <ul style="list-style-type: none"> <li>• Murder and bereaved families.</li> <li>• Violent crime.</li> <li>• Children and young people.</li> <li>• Under reporting and under representation.</li> <li>• Avoidable deaths among or caused by mental health patients. This is also linked to Domestic Abuse.</li> <li>• Vulnerable victims and witnesses.</li> </ul>	<p>We note the concerns and agree that there is a need to avoid creating a hierarchy of victims. This is certainly not the intended outcome.</p> <p>Whilst we intend that the Commissioner should have a specific role in relation to some particularly vulnerable groups of victims, the overall remit is to represent <u>all</u> victims of crime.</p> <p>Within that remit, it will be for the Commissioner to identify their strategic priorities, including any other vulnerable groups or areas that they believe should receive particular focus.</p>
<p>One response said that the Victims of Crime Commissioner Designate should decide how funds are spent cognisant of intersectionality across different victim categories and emerging issues and another noted that there may be gaps in service for minority and marginalised groups who need greater protection.</p>	<p>Noted. It will be for the Commissioner to identify how best to use the resources available to them to carry out their functions, including identification of and delivery against their strategic priorities.</p>
<p>One response argued that the principle of prescribing areas for specific focus</p>	<p>Noted but disagree. We are setting out what the core functions of the</p>

<p>contradicted the principle of independence and autonomy.</p>	<p>Commissioner are intended to be but building in independence and autonomy for the Commissioner to set their own strategic priorities within those core functions and remit.</p>
<p>Responses again noted that it is important that resources are made available to support consistent delivery.</p>	<p>Noted and agree in principle. As future year budgets are not yet set, funding for 2022-23 onwards would need to be considered as part of the future year budget process.</p> <p>Therefore the level of policy and administrative support that will be provided to the Commissioner will be subject to available funding through future Departmental budget allocations. In taking forward the appointment the Minister has indicated that the Commissioner Designate's role in scoping out the role and powers for the statutory Office should be prioritised.</p>
<p>One response proposed that there should be an obligation on the Victims of Crime Commissioner to work with other Commissioners.</p>	<p>Noted. However we believe it is preferable that it should fall to the Commissioner to determine where it is beneficial and appropriate to work with other Commissioners where there are common interests in line with their identified priorities.</p>
<p>One response noted that it was continuing to advocate for a dedicated Domestic Abuse Commissioner in NI</p>	<p>Noted – however as previously indicated, the Minister has concluded that a Victims of Crime Commissioner with a specific focus on Domestic and Sexual Abuse victims is a more effective use of limited resources.</p>

<b>Question B.5:</b>			
<i>Do you agree that the Victims of Crime Commissioner should have the autonomy to set their own priorities and be required to develop a Strategic Plan and report annually on delivery against this Strategic Plan? Y/N</i>			
<b>Total Responses -</b> 30	<b>Yes - 24</b>	<b>No - 0</b>	<b>Not answered - 6</b>
<b>Summary of comments</b>		<b>DOJ response</b>	
Again, there was broad support for the proposed autonomy set out in the consultation. A number of additional comments were made.			
<p>A number of responses commented on how the strategic priorities should be informed, with some noting a need for transparency and accountability.</p> <p>One response suggested that the Commissioner's priorities should be based on the Victim and Witness Strategy; others that they should be based on consultation with victims, survivors, and victim support service providers.</p>		<p>Noted.</p> <p>We recognise the need for the Commissioner to engage with victims and their representatives and support providers, as well as being informed by up to date research in order to be able to set informed and effective priorities. We have also proposed that the Commissioner should also establish an Advisory Group.</p> <p>We do not believe that these should be constrained by alignment with the Victim and Witness Strategy (although we recognise the relevance and acknowledge that there is likely to be an overlap). We remain of the view that the Commissioner is best place to set their own strategic priorities in relation to carrying out their functions.</p>	
Some responses welcomed the opportunities for engagement and collaboration with other commissioners, including the Commissioner for Victims and Survivors and COSICA, but recommended greater clarity on how they should work together to ensure the most effective use of resources and prevent duplication of effort.		<p>Noted.</p> <p>The Department recognises the potential benefits of working with other Commissioners where there is a common victim interest.</p> <p>We do not believe that it is helpful or possible to prescribe how this should be done but note that where</p>	

	Commissioners are working collaboratively they should be doing so in pursuit of their specified core functions and the terms of their appointments.
One response advised that in establishing the statutory role legislation should clearly set out the expectations and timeframes for strategic plans and reporting.	Noted – this is our intention.
Another comment set out that the Commissioner’s Annual Report should also act as a “State of the Union” style report on issues affecting victims of crime and include analysis of compliance with the Charters.  It should be laid before the Assembly each year with an accompanying debate.	Noted.  The Department will discuss and agree with the Victims of Crime Commissioner Designate the format of the Annual Report to be produced. In addition to the content proposed in the comment we believe the report should also provide an overview of the Commissioner’s delivery against their strategic plan.
A number of comments highlighted the importance of independence for public confidence.  One response added that this should be underpinned by transparent finance and governance arrangements, with another noting that the Commissioner should remain accountable to the Minister of Justice.	Noted.  We agree with the principle of independence and with the need for public confidence in the Commissioner.  The Commissioner Designate will be expected to ensure that proper financial controls are fully observed, in line with Managing Public Money Northern Ireland and with Departmental guidance. As the Accounting Officer, the role holder will also be responsible for the effective and economic use of human, financial and technical resources, within their direct command.  The Commissioner Designate will be accountable to the Minister of Justice, through the Department of Justice, for the operation of their office and, through the Director of Access to Justice, for their personal performance.

	We have also proposed that the Commissioner should report annually to the Minister of Justice through an Annual Report.
One response proposed that Restorative Practice should also be incorporated to form part of strategy to address harm.	Noted.  Whilst we do not believe that this function should fall to the Commissioner, we would clarify that we have revised the Victim and Witness Strategy to include a commitment around restorative justice practices.

<b>Question B.6:</b>			
<i>Do you agree that the Minister of Justice should be able to ask the Victims of Crime Commissioner to conduct a thematic review and advise on particular victim-related priorities, where she considers that necessary? Y/N</i>			
<b>Total Responses - 30</b>	<b>Yes - 22</b>	<b>No - 3</b>	<b>Not answered - 5</b>
<b>Summary of comments</b>		<b>DOJ response</b>	
<p>Again there was broad support for this proposal, subject to the principle of maintaining the Commissioner's independence.</p> <p>A number of other comments were made.</p>			
<p>A number of respondents were of the view that the Commissioner should have the autonomy to accept or deny requests from the Minister.</p>		<p>Noted.</p> <p>We acknowledge the concerns raised about preserving the Commissioner's independence. We would also add that where the Minister felt it necessary to take such a step it would be intended as a measure to benefit of victims of crime and deliver improved outcomes.</p> <p>However, we also recognise that the Commissioner would need to balance any such request against capacity and their strategic plan and so we respect the Commissioner's autonomy to</p>	

	decline such requests where they do not believe they are in a position to accept.
A number of responses, whilst supportive that thematic reviews are essential, emphasised that they must have teeth and accountability and the recommendations must be carried out.	As previously noted, there is no capacity to legislate for statutory powers within this mandate, however as the Minister has indicated, our intention is to bring forward legislation to put the Commissioner on a statutory footing in the next mandate,  As such the Commissioner Designate will not have statutory powers. However the nature of the role is intended to be public and therefore will carry significant influence both to challenge and to hold to account publicly.
Some responses questioned whether this would duplicate the role of CJINI.	We acknowledge the point although it is not our intention to duplicate the role of CJINI.
One response suggested that the Minister of Justice should be in contact with stakeholder groups to inform her interaction with the Commissioner.	Noted.  The Department engages closely with stakeholder groups on issues relating to victims and the appointment of a Commissioner is not intended to replace this engagement.
One response noted that other Executive Ministers should be able to ask the Commissioner to conduct a thematic review and provide advice where they have a particular victim priority.	Our priority in establishing the Commissioner has been to drive improved outcomes for victims of crime and we anticipate their primary focus will be on the criminal justice system.  However we recognise that the needs of victims extend beyond the justice system and so, subject to the Commissioner's own identified priorities, recognise that there is scope within the role to work with other commissioners where there are shared interests and to comment on the roles of other relevant Departments on victim issues.  However, we also recognise that the Commissioner would need to balance any such request against capacity,

	identified priorities and their strategic plan and would have autonomy to decline such requests where they do not believe they are in a position to accept.
One response, whilst supportive suggested that this should be enshrined in legislation, setting out the parameters.	Noted – we will wish to consider when developing the legislation for the statutory role whether there is a need for this to be prescribed in statute.

<b>Question B.7:</b>			
<i>Do you agree that the Victims of Crime Commissioner Designate has a role in helping to inform the development of the statutory role? Y/N</i>			
<b>Total Responses -</b> 30	<b>Yes -</b> 24	<b>No -</b> 0	<b>Not answered -</b> 6
<b>Summary of comments</b>		<b>DOJ response</b>	
Again there was broad support for this proposal.  A number of other comments were made.			
One response noted the need to listen to victims in the shaping of the statutory role.		Noted and agreed – as previously set out, we recognise the need for the Commissioner to engage with victims and their representatives as well as being informed by up to date research.  We have proposed that the Commissioner should also establish an Advisory Group.	
One response proposed that the Commissioner Designate should not be able to apply for the statutory role and one response sought clarification on this.		Noted. This issue is currently under consideration and legal advice has been sought.	
Again resourcing was raised with respondents noting that it would be useful for the role to be informed by costs and income available.		Noted.  As previously set out, future year budgets are not yet set and so funding for 2022-23 onwards would need to be	

	<p>considered as part of the future year budget process.</p> <p>Therefore the level of policy and administrative support that will be provided to the Commissioner will be subject to available funding through future Departmental budget allocations. In taking forward the appointment the Minister has indicated that the Commissioner Designate's role in scoping out the role and powers for the statutory Office should be prioritised.</p>
<p>One respondent suggested that a time limit should be set for the introduction of the statutory role.</p>	<p>Consideration is currently being given to the estimated time needed before a statutory appointment can be made. However decisions on the timing of the introduction of legislation to create a statutory Commissioner will be a matter for the Minister of Justice in the next mandate.</p>



## PROPOSAL:

The Minister of Justice is proposing that the Victims of Crime Commissioner should establish an Advisory Group with experience and expertise in the criminal justice system and issues impacting on victims of crime that would advise and assist the Commissioner in identifying and executing the priorities for the post.

<b>Question B8:</b>			
<i>Do you agree that the Victims of Crime Commissioner should establish an Advisory Group? Y/N</i>			
<b>Total Responses -</b>	<b>Yes -</b>	<b>No -</b>	<b>Not answered -</b>
30	22	1	7
<b>Summary of comments</b>		<b>DOJ response</b>	
Once again there was broad support for this proposal with additional comments focusing on having broad membership to represent all victims of crime, as well as including criminal justice organisations, voluntary and community sector organisations and victim support organisations. In addition it was suggested that the Advisory Group should have clear terms of reference outlining the involvement required from the Group and how conflicts of interest would be managed.		Noted - It will be for the Victims of Crime Commissioner Designate to determine the size, membership, structure and functions of the Advisory Group.	

## Minister's meeting with Reference Group

On 22 June 2021, the Minister also met members of the Reference Group that had been originally set up to help shape proposals for the establishment of the Victims of Crime Commissioner to discuss the consultation paper in more detail. The key points from the discussion on Section B were:

- there was strong support for the creation of a Victims of Crime Commissioner role. Whilst recognising the importance to have the ability to focus on specific crime types, members agreed there should be no hierarchy of victims;
- a Victims of Crime Commissioner should be independent and the role not bound too tightly in legislation. A Commissioner should have the ability and authority to set their own priorities. The Minister should however be able to ask a Commissioner to carry out thematic reviews on emerging issues which would improve outcomes for all victims and witnesses;
- the role should be adequately resourced;
- the Commissioner should work collaboratively with a number of other Commissioners and Departments, this is vital to understand how the wider needs of victims intersect across range of issues; and
- it is important to recognise that each victim's journey is different and not all will end in a courtroom setting, therefore there is a need to consider alternative resolution.

These comments reflect the points raised in the written consultation responses to which the Department has set out its position above.

## 7. Section B - Establishment of a Victims of Crime Commissioner: Analysis and Next Steps

7.1 Following a 12 week consultation in which the consultation was distributed to a wide range of bodies and stakeholders, published on the DoJ website and promoted through social media, 30 responses were received.

7.2 Overall, a significant majority of respondents agreed with the proposals made in the consultation, and there were a number of additional comments and observations which have been summarised in Section 6 above. The broad emerging themes related to the following areas:

- independence of the Commissioner;
- legislative Powers;
- that the Commissioner needs to be adequately resourced;
- that the Commissioner should be informed by victims' needs;
- that their remit should be cast wider than criminal justice and that they should be able to scrutinise and advise other departments, Ministers, etc
- that the Commissioner needs to be able to hold statutory authorities to account; and
- that they should have the ability to work with other commissioners.

7.3 Acknowledging the broad agreement and support for the proposals in relation to the establishment of a Victims of Crime Commissioner, the Department therefore intends to progress plans for the public appointment process to recruit a Victims of Crime Commissioner Designate on the basis of the role and functions set out in the consultation document for which a significant majority of respondents were in agreement. The Department is aiming to complete the appointment process within the current mandate. The Department continues to engage with the Commissioner for Public Appointments NI (CPANI) and the public appointment will be carried out in the spirit of the CPANI code of practice.

## *Resourcing*

- 7.4 A number of responses raised the matter of resourcing. As outlined in the consultation document, an initial assessment of the resource requirements for the Victims of Crime Commissioner Designate has been made, taking account of staffing and running costs. However, affordability and value for money are both key factors in establishing the role.
- 7.5 As future year budgets are not yet set, funding for 2022-23 onwards would need to be considered as part of the future year budget process. Therefore, the level of policy and administrative support that will be provided to the Commissioner Designate will be subject to available funding through future Departmental budget allocations. In taking forward the appointment, the Minister has indicated that the Commissioner Designate's role in helping to scope and inform the role and powers a statutory Commissioner should be prioritised.

## *Sharing the Summary of Responses with the new Victims of Crime Commissioner Designate*

- 7.6 There were a number of comments that would feed into the work to be undertaken and decisions to be made by a Victims of Crime Commissioner Designate once they are appointed. Therefore, the Department will share the Summary of Responses with the new Commissioner Designate to make them aware of the views expressed.

## *Consideration when developing legislation*

- 7.7 A few comments were made in relation to legislating for the statutory role, these relate to:
- Powers to hold departments and statutory organisations to account;
  - Powers to initiate/intervene in legal matters and have legal/investigatory powers; and

- Stipulate the expectation and timeframes for the Strategic Plan and reporting.

These comments will be considered when the legislation is being developed in the next mandate and as noted, the Commissioner Designate will have a key role in helping to inform and scope the role and powers of a future statutory Commissioner.

#### *Further consideration required*

7.8 There were a couple of comments for which the Department will need to give further consideration. These are in relation to:

- *Setting a time limit for the introduction of the statutory role* – the intention is to legislate for the statutory Victims of Crime Commissioner in the next mandate. However, decisions on the timing of the introduction of legislation to create a statutory Commissioner will be a matter for the Minister of Justice in the next mandate; and
- *Whether or not the Victims of Crime Commissioner Designate should be able to apply for the statutory role* – this is currently under consideration and legal advice has been sought.

There were also some comments in relation to clarity on certain aspects of the role. Further details will be clarified as part of the appointments process; others will be agreed in discussion with the Victims of Crime Commissioner Designate, when appointed.