

Northern Ireland Executive

Consultation on Our Plan: Doing What Matters Most Draft Programme for Government 2024 - 2027

**Response from the Commissioner Designate
for Victims of Crime for Northern Ireland**

November 2024

1. About the Office of the Commissioner Designate for Victims of Crime

- 1.1 The Commissioner for Victims of Crime's Office (CVOCO) is an independent body which represents the interests of victims of crime in Northern Ireland. The Commissioner Designate was appointed by the Minister of Justice in March 2022 to be an independent voice for victims of crime. The overarching purpose of the Commissioner Designate is to represent the needs and interests of all victims of crime and help drive systemic improvements across the criminal justice system.
- 1.2 This will include helping to identify any areas where victims are not consistently being provided with their entitlements set out within the Victim Charter and ensuring that their issues and experiences are raised in the public arena, with Government, with criminal justice organisations and organisations that support and represent victims, in order to bring forward effective change.

2. General Comments

- 2.1 The Commissioner Designate welcomes this consultation on the NI Executive Programme for Government (PfG) 2024-27 and the opportunity to provide comment. For the purposes of this consultation, the Commissioner Designate's comments are focused on areas of the Programme for Government which have direct relevance to victims of crime in Northern Ireland.
- 2.2 In 2022/23 there were 111,571 crimes recorded in Northern Ireland, 69% of which had a direct person victim. It is estimated that a further 50% of crime is not reported to the police. Behind each number is at least one victim and family members who have been deeply impacted by both the crime itself and their subsequent engagement with our justice system.
- 2.3 Victims of crime are a diverse group of citizens from all walks of life, whose only link is their shared experience of crime, and the issues faced by them are not solely the purview of justice. Victims may be physically or psychologically affected by the impact of crime requiring health interventions; they may be placed under financial stress by destruction of property or inability to work due to injury; they may be in need of safe and suitable housing for themselves and

their families if their homes are attacked. Victims, therefore, stand to benefit from numerous proposals outlined in the PfG, yet may be a hidden cohort whose needs are not immediately evident when discussing housing, health, care or infrastructure.

- 2.4 The Commissioner Designate welcomes that the PfG's aspirations span the coming year, the remainder of the mandate, and longer-term goals or missions, the foundational work of which must start now to positively impact generations to come. The Commissioner is disappointed, however, that much of this PfG lacks specific detail as to how much of the plan will be implemented, measured and improved to ensure government is truly doing 'what matters most'. The Commissioner is also concerned that the actions outlined within the PfG fall short in many instances of explicitly committing to deliver on the plan's objectives, let alone outlining how these commitments will be achieved or providing measurable goals and timeframes.
- 2.5 The Commissioner Designate notes that the PfG promises that the Executive will work across departments in genuine cooperation. This is to be welcomed; however given the siloed nature of how government departments are set up and operate, it is unclear how this can become an operational reality without specific actions and commitments within the PfG to mould government structures, culture and budgets to cross-departmental collaboration on cross-cutting issues.
- 2.6 Finally, whilst the Commissioner Designate recognises the current budget pressures being experienced here, nonetheless the success of this PfG in delivering on its aims will depend upon the ability to fund the initiatives outlined. The PfG is unclear on how the entirety of this work will be resourced and delivered, and in particular how innovation projects might be funded within a limited budget without negatively impacting upon continued or improved delivery of key services. This is concerning as without the ability to deliver on the plans within the document, the PfG is essentially toothless.

3. Safer Communities

- 3.1 The Commissioner welcomes that Safer Communities is a key focus of this Programme for Government, and that the negative impact of poverty, trauma, domestic abuse, and paramilitarism are recognised as factors affecting

community safety. The Commissioner strongly supports the aim within the PfG to “*embed trauma-informed, responsive systems; systems that help people to easily navigate and access the support they need, when they need it, and for however long they need it for*”, and that adequate resourcing and tackling the root causes to reduce overall offending are highlighted. The commitment to a strategy to reduce offending, and crucially also reoffending, is also hugely welcome. In the Commissioner’s experience speaking with repeat victims, it is striking how they can often be the most severely impacted by crime. Although the individual crimes perpetrated against them may in isolation be deemed by the justice system to be relatively ‘minor’ or ‘low level’, the cumulative effect of repeated attacks often result in a feeling of being profoundly unsafe, hypervigilance, trauma and mental ill-health. The Commissioner also strongly agrees that we need trauma-informed systems that are easy to navigate and access to support for people when and for as long as they need them.

3.2 However, the Commissioner Designate remains concerned that this section lacks detail demonstrating how these aims will be successfully achieved. Disappointingly, these proposals also fall short of a commitment to comprehensive transformation of the justice system, which in the view of the Commissioner is the approach needed to truly deliver on the collective aims and aspirations to improve the justice system held within the PfG and other strategies such as DOJ’s Victim and Witness Strategy and the DOH/DOJ Domestic and Sexual Abuse Strategy. The PfG also lacks specific detail about what investment might be made to achieve the goal of making communities safer, or specifics as to how greater links between agencies and Departments might be made given that safer communities is a cross-cutting issue.

3.3 Another significant gap is commitment to comprehensive community engagement when planning and delivering on the Safer Community strand. It is unclear if pre-consultation engagement with local communities has taken place to inform this draft, or if ongoing community engagement is envisaged as a fundamental means of driving governmental work in this regard. It is often communities themselves who know best what might be most effective to make their areas safer. Furthermore, communities themselves are a key stakeholder in any multi-agency efforts and their buy-in is crucial to maximising the chances of success for the objectives and aims outlined here. In the spirit of delivering community safety with, not to, communities, the Commissioner Designate recommends that this section of the PfG is amended to include a pledge to work with and listen to local communities when developing community safety responses.

3.4 In the inaugural Victim Survey carried out by CVOCO¹, a key finding was that only 7% of respondents were fairly confident that the criminal justice system could deliver for victims of crime, and not a single respondent was very confident that the criminal justice system could deliver for them. Confidence in the justice system is vital to its efficacy and ability to deliver justice, and these findings represent nothing short of an SOS from victims of crime that the criminal justice system must transform its structures, ways of working and culture to give victims a place in the system and restore confidence in justice. As the Commissioner noted in the CVOC Strategy 2022-25:

“The system is failing to deliver what is promised to victims and what they, as the individual most greatly impacted by the crime, should rightly expect. Far too often, the needs of victims are an afterthought, and rather than being seen as an obligation enshrined in law, often fall to the bottom of the list of priorities which may or may not happen.”²

3.5 Clearly there are some positive proposals within this section that will go some way to boost victim confidence and ultimately contribute to safer communities. For instance, tackling delay in the justice process is one of three key priority areas for the Commissioner for Victims of Crime over her mandate, and the Speeding Up Justice programme is a vital means of addressing this pressing issue. Victims continue to report to the Commissioner that their cases are adjourned multiple times, often with little or no notice given to them and scant explanation of why, adding to their anguish and stress as they engage with a justice process that regards them procedurally as merely a witness. Time and again victims tell us of the impact of these delays on their lives and their ability to recover from their trauma. Yet successive efforts to date to reduce delay, improve case management, and create a more efficient and streamlined justice process have ostensibly failed. The Commissioner urges that the PfG is strengthened to incorporate the Speeding Up Justice priority within a broader justice transformation agenda which commits to bold systemic and cultural change required to make justice really work for all, including victims of crime, and a commitment for the funding necessary to deliver this.

¹ The survey was carried out online between September 2023 and March 2024 and can be accessed here: [2023-24 Victim Survey Results.pdf](#)

² CVOC [Strategy 2022-2025](#)

- 3.6 One simple means of demonstrating to victims that they are valued within the justice system and by government would be to make a commitment within the PfG to more robust Victim Charter compliance across agencies. The Victim Charter, which guarantees victims of crime the right to be treated with dignity and respect, informed about available support, provided with information they need and given an opportunity for concerns to be addressed, has been on a statutory footing for almost ten years now. Yet, despite being enshrined in law since 2015, we still do not have processes to monitor individual agencies' compliance with this charter. We have an opportunity and an obligation to do more to promote and enforce those rights, and reinforcement of these obligations within the PfG would be an important step in signalling to victims that the government is serious about justice reform and better recognising the place of victims within the system.
- 3.7 Another key component of the justice transformation piece is the enhancement of victim care within the system. Whilst the Commissioner welcomes the aim to embed trauma-informed, responsive systems, it is concerning that the PfG does not outline how this will be achieved. The Commissioner welcomes the commitment in the PfG to enhanced communications both between criminal justice agencies and with victims and witnesses, including through digitisation. This is an important part of victim care. Victims frequently tell us that better communication from statutory justice agencies during the often-lengthy justice process would make an immense difference to their experience of seeking justice, and mitigate the further trauma inflicted on them by the justice process. That said, digitisation is not a magic bullet that will solve the perennial problem of inadequate communication with victims and witnesses – again, success in delivery of this aim will depend upon systemic and cultural transformation of justice, including a shift in perspective to recognise victims as a key actor in the justice process. This commitment to justice transformation must be reflected in the PfG if its aims under this section are to be effective.
- 3.8 Work should focus on examining the system through the eyes of victims, and identifying appropriate touch points where they need information, updates, meaningful participation and opportunity to influence where appropriate. Any reform should be made in consultation with victims and organisations supporting them. Enhanced funding and remit of the structures that are tasked with communicating with victims, such as the Victim and Witness Care Unit, is crucial to the success of this project.

3.9 In particular, the development of an adequately resourced needs assessment service within the Victim and Witness Care Unit, as recommended by CJINI in successive reports on care of victims and witnesses in the justice system, would be a pragmatic, effective step towards achieving this goal. The Commissioner Designate recommends that this is explicitly included as an action within the PfG under the Safer Communities strand.

3.10 The Commissioner would also stress that communication is not a one-way system, and that enhancing communications between agencies and victims will necessitate finding ways to give victims a voice in courtrooms and throughout the justice process. One means would be via reform of how Victim Personal Statements are taken, used and reflected in court at sentencing stage. As the Commissioner stated in her recently-published report on Victim Personal Statements:³

“Ultimately, the VPS is about giving victims a voice. It is incumbent on us all to ensure that their voice is heard, respected and given due weight at every stage of the justice process.”

Better guidance, training and processes to ensure victims are informed about and supported through making and submitting a VPS, as well as legal change to give victims the option to read out their VPS in court, will help give victims a voice in a process which often fails to allow them to be heard.

3.11 The voice of the victim should also be strengthened throughout this section of the PfG overall, as currently many of the proposed concrete actions remain offender focused. Whilst the Commissioner welcomes the commitment to reduce offending, the needs of today’s victims cannot be absent from this conversation. The place and role of victims in PfG priorities around early intervention, diversion and community sentencing must be enhanced, and any commitment to restorative approaches should recognise the victim and their community as key participants. This should be reflected within a broader commitment in the PfG to make justice more victim-centred. Victims continue to report that their experience of the justice process is one where at best they are treated like a bystander or at worst they report harm greater than that caused by the crime itself. If we are to ensure continued support for this system we must not lose sight of the individual in the process who has been most impacted by the crime. If victim trust is damaged at any stage, it is very difficult to restore. We must ensure that victims are central to our approach and

³ See [Victim Personal Statement NI Policy v Practice October 2024.pdf](#)

decision-making at every stage of the process, and to our collective efforts to build a safer community as outlined in the PfG.

- 3.12 The Commissioner Designate acknowledges that justice transformation is not something that can happen overnight. It will necessarily involve difficult conversations about how to rebalance the Article 8 privacy rights of victims with the Article 6 rights of the accused, and innovative solutions for establishing a voice for victims as party to proceedings. However, for long-term transformation to have a chance of becoming a reality, it must be committed to today at the highest level. The PfG includes aspirational Missions aimed at laying the foundational work for longer term change, and it is the view of the Commissioner that a pledge to undergo the complex work of justice transformation should be explicitly made within the plan.

Justice transformation cannot be a distant aspiration – it is incumbent upon this government to make it a priority within the PfG today so that victims of tomorrow can have confidence that they will be protected, supported and able to seek justice without further significant trauma should they report a crime.

- 3.13 Finally, as with many problems facing NI, efforts to make our communities safer are most likely to be successful in an environment where cross-departmental working is structurally embedded and investment is made in early intervention and prevention work. Key to this is the ability to fund meaningful long-term interventions and moving away from one year budgets and departmentally siloed funding that is at odds with the joined up thinking and cross-departmental action needed to solve society's more complex problems. Such an approach will ultimately save money in the long run, as issues are addressed before becoming crises down the line.

- 3.14 The Commissioner Designate was disappointed to note that the follow up review undertaken by CJINI in 2023 into the care and treatment of victims and witnesses found the ongoing prevalence of a silo mentality where agencies had moved forward alone in respect of certain recommendations.⁴

- 3.15 In order to achieve long-term, consistent improvement, no part of the justice system can be seen in isolation. While many of the bodies in the system are independent, they are all inter-connected. We can only improve the

⁴ [Victims and Witnesses: The care and treatment of victims and witnesses by the criminal justice system in Northern Ireland. A Follow-Up Review of recommendation implementation.](#)

criminal justice system for victims of crime if we take a holistic approach, and recognise that the responsibility of supporting victims of crime is not just about the criminal justice system. Supporting victims effectively is truly cross-cutting and requires input and work by all government departments and wider society. This includes in the first instance reflecting the role of civil and family courts in fostering safer communities, specifically in relation to victims of domestic violence, within the PfG. Furthermore, all relevant departments and agencies need to accept that they share a collective responsibility for the experience and care of victims of crime and be proactive in playing their part to meet their health, housing, financial, and logistical needs. Vital to the success of any cross-cutting approach will be comprehensive data collection to monitor the impact of this work and pivot to new solutions should current efforts not yield the outcomes needed for victims. This should be coupled with adequate resourcing which explicitly includes sustainable funding of the community and voluntary organisations, who deliver expert support to victims of crime throughout their journey.

4. Ending Violence Against Women and Girls

- 4.1 The Commissioner Designate welcomes that ending violence against women and girls (EVAWG) is a standalone priority within the PfG and that this work has been embedded on a cross-government basis. This was a key ask by the Commissioner during consultation on the EVAWG Strategic Framework, and shows political buy-in and willingness to do the necessary partnership working required to meaningfully tackle the root causes of violence against women and girls in our society.
- 4.2 The number of murders of women over the past weeks and months in Northern Ireland is a stark reminder of just how prevalent the problem of violence against women and girls is. This is a problem of a magnitude that requires a response comparable to that of our response to organised crime and terrorism.
- 4.3 The Commissioner Designate welcomes the NI Executive Strategic Framework and accompanying delivery plan, in particular its focus on early intervention and prevention and tackling the root causes of violence against women and girls. The commitment to joined up, trauma-informed public health approach that links in with other related work such as the Domestic and Sexual Violence And Abuse Strategy, is very encouraging.

- 4.4 As previously stated by the Commissioner upon the publication of the EVAWG Strategic Framework, adequate resourcing is vital to ensure delivery of this ambitious work. Whilst it is positive that specific funding streams have been identified in the PfG in the form of the Change Fund and Challenge Fund, it should be noted that these are not a substitute for a fully-costed strategic framework that enables all actions and aspirations to be fully realised. As Metropolitan Police Commissioner for London Mark Rowley has noted, the issue of violence against women and girls is of such a scale that it will require the same level of funding as that required to combat terrorism. This is as much the case in NI as it is in other parts of the UK.
- 4.5 Much like the community safety strand, tackling the scourge of violence against women and girls will necessitate sustainable resourcing of our voluntary sector organisations who provide support to women and girls who have experienced violence and abuse. While it is hoped that effective prevention and early intervention initiatives to disrupt attitudes and societal norms that foster inequality, misogyny and violence will reduce the number of women and girls who become victims, it must also be acknowledged that women and girls will continue to need services that provide support and safety. The Commissioner therefore urges that the PfG reflects a commitment to greater funding to underpin the Domestic and Sexual Violence and Abuse Strategy in addition to that outlined for EVAWG.
- 4.6 Similarly, whilst the establishment of a Challenge Fund is to be welcomed, investment of public monies must strike a balance between the need for innovation and the adequate funding of core support services. In the words of one victim who shared their experience of crime with the Commissioner Designate, 'you need to look at the things that are there that aren't working and fix them first'.
- 4.7 Finally, the Commissioner Designate strongly recommends that any actions to raise awareness about violence against women and girls as referenced in the PfG explicitly include reform of Relationships and Sexuality Education (RSE) in schools. Victims as well as voluntary and community sector representatives regularly tell us about the need for a clear commitment to RSE – this issue was also highlighted by Sir John Gillen in his review of the handling of serious sexual offences. Indeed, one of the most effective means of disrupting unconscious bias and changing the societal attitudes that enable violence against women and girls to flourish is through age-appropriate, science and evidence based RSE at all stages of the curriculum. Such education not

only builds resilience in our children and young people and gives them a blueprint for what healthy relationships look like, it also provides them with the tools to seek help should they become victims of abuse, violence or unhealthy or coercive behaviours.

5. Childcare

5.1 Whilst childcare and Early Years interventions may not at first glance appear to be an objective with direct relevance to victims of crime, the Commissioner is aware that lack of affordable and available childcare, particularly in rural areas, can be a cause of stress for those arranging to attend court. If we take a holistic approach to making the justice process more victim-centred and trauma-informed, this should include addressing logistical barriers including childcare.

5.2 The Commissioner Designate is also cognisant that any early years interventions to overcome disadvantage, and enable children to have the best start in life, cannot be divorced from the reality that many children in NI suffer Adverse Childhood Experiences (ACEs) such as neglect, sexual abuse, and domestic violence. For these children, it is simply not possible to decouple child development in early years from the adverse experiences they face in their daily lives which have a profound and lasting negative impact on how they live, thrive and grow into tomorrow's adults. Recognition of this fact and a governmental undertaking to take decisive, cross-cutting action to disrupt abuse and support those children affected to live their best lives may best fit under this section or under Safer Communities – either way, it is a significant gap within the PfG that should be remedied.

6. Waiting times

6.1 Hospital and treatment waiting times are without doubt a priority issue that must be urgently remedied, and the Commissioner Designate recognises that difficult prioritisations must be made to fix our broken health system. That said, it is disappointing that this PfG has not also prioritised reform, improvement and investment in mental health services.

- 6.2 The Public Accounts Committee (PAC) in its recent report on mental health services in NI noted that *“Mental health remains one of the greatest health issues affecting Northern Ireland, impacting many of the most vulnerable in society”*⁵ and acknowledged significant gaps in services meaning that many are not getting the care that they deserve and need.
- 6.3 Providing adequate services to meet the mental health needs of our population is a cross-cutting issue, and one that deeply affects victims of crime. The trauma experienced as a result of crime, and indeed the experience of the justice process itself, can profoundly impact upon victim mental health, with repercussions for their recovery, sense of safety, and ability to flourish and contribute to society. In the Commissioner’s inaugural survey of victims of crime in NI⁶, 43% of respondents told us that they had been diagnosed with a mental health condition in the last 12 months, including PTSD, anxiety and depression. Of those who disclosed a mental health condition, almost all said that it significantly reduced their ability to carry out day-to-day activities.
- 6.4 In particular, the Commissioner would draw attention to the significant role of mental health service provision to adequately support victims of abuse. Victims of domestic violence and sexual abuse regularly tell us about the serious impact abuse has had on their mental health, and how insufficient service provision has stymied their ability to fully recover and flourish as individuals and active members of their communities. Not only would an overarching PfG resolution on mental health aid the successful delivery of the Ending Violence Against Women and Girls strand, it would also serve to benefit male victims of domestic and sexual abuse who are often hidden victims. In forthcoming research commissioned by CVOCO, findings will include that intimate partner violence against men constitutes a significant public health concern, necessitating action to formulate better law and policy in this area at NI governmental level. Inclusion of a mental health strand within the PfG would be a significant step towards better serving this hidden cohort of victims.
- 6.5 Mental ill-health is also often a factor in the commission of crime, with 45% of offenders assessed by Probation Board of Northern Ireland (PBNI) between

⁵ Report on Mental Health Services in Northern Ireland, Public Accounts Committee, June 2024
<https://www.niassembly.gov.uk/assembly-business/committees/2022-2027/public-accounts/reports/public-accounts-committee---report-on-mental-health-services-in-northern-ireland/>

⁶ See [2023-24 Victim Survey Results.pdf](#)

2017-21 as having had some level of mental health issues which contributed to their offending.⁷ In its report on mental health services in NI, the PAC found that gaps in mental health support provision here have resulted in police involvement as first responders in cases where mental health professionals would be better placed to intervene. As concluded in their report:

“This doesn’t result in savings for the public sector and is unlikely to produce the best outcomes for those in need.”

6.6 More clearly needs to be done to address our crisis in mental health care, for the benefit of those suffering ill-health and for society as a whole. It is clear that failings to date in grappling with this thorny issue have resulted in preventable victimisation, suffering and deaths. Opportunities are clearly being missed to intervene in a timely manner to assist those struggling with mental ill-health, including at the various points at which a person might engage with justice system agents including the PSNI, Prisons Service and Probation Board.

6.7 The Commissioner would like to see concrete action to tackle our mental health crisis embedded across multiple strands of the PfG in recognition of its cross-cutting relevance and importance to the success of many aspects of this plan including safer communities, ending violence against women and girls, addressing waiting lists, caring for our children, and reform and transformation of our public services. Such an approach was recommended by the NI Audit Office in its 2023 report on reducing adult reoffending:

“Improved cross-government working is needed to secure improvements across key desistance pathways including accommodation and mental health.”⁸

6.8 In particular, the Commissioner would draw attention to the findings of the coroner in the inquest into the deaths of Marjorie and Michael Cawdery:

“This inquest has highlighted the absolute necessity of clear, effective, robust, collaborative, multi-agency working, across all interfaces in dealing with mental health in Northern Ireland. This can be improved by way of interface meetings, meaningful engagement, and shared learning, which could only serve to build, enhance, and maintain positive relationships among those agencies involved in mental health care.”

⁷ NI Audit Office, Reducing Adult Reoffending in Northern Ireland, June 2023, available at [NI Audit Office Report - Reducing Adult Reoffending in NI_0.pdf](#)

⁸ NI Audit Office, Reducing Adult Reoffending in Northern Ireland, June 2023, available at [NI Audit Office Report - Reducing Adult Reoffending in NI_0.pdf](#)

- 6.9 For such a recommendation to become a reality, it is the view of the Commissioner Designate that transformation of mental health provision should be a standalone priority within the PfG, especially given its relevance to the success of so many other aims already contained therein.

7. Social housing

- 7.1 The Commissioner Designate regularly bears witness to how our housing crisis negatively affects victims of crime, particularly those who have experienced hate crime, domestic violence, and paramilitary-related community coercive control. Victims of domestic violence tell us of occasions where they have felt forced to remain in abusive situations, often with their children, due to lack of suitable alternative social housing, compounded by the financial precariousness inherent in leaving a partner. Similarly, victims of hate crime often share how they have been criminally targeted on race, sectarian, LGBT, disability, or age grounds with the end goal of pressuring them to leave their homes in order to secure housing for 'local' people. In many such cases a paramilitary coercive control element is present, amplifying victims' fear for their safety and that of their families.
- 7.2 Similarly, the violence and unrest during the summer months, in which refugees, asylum seekers and ethnic minority communities as well as housing providers were targeted, demonstrates how housing and community safety are often intertwined. Whilst the reasons for the violence were varied and complex, it is without doubt that social housing shortages and perceived preferential treatment of refugees and asylum seekers in housing allocations acted as a catalyst for the unrest.
- 7.3 The Commissioner Designate is therefore heartened that housing and fuel poverty have been identified in the PfG as priorities. The focus on preventing homelessness will benefit multiple cohorts, including victims fleeing domestic violence and those who are displaced from their homes due to intimidation or the criminal targeting of homes. Housing stock is, however, only one component in a crisis that requires a nuanced, united, and robust response. The Commissioner strongly urges that action to tackle racism, xenophobia and anti-migrant sentiment, alongside victims of other forms of hate that affects their ability to remain in their homes, are specifically referenced in this section, or alternatively under the Community Safety and/or Peace sections. This issue

intersects with multiple PfG priorities, requiring proactive prevention and early intervention work alongside the crisis response to violence and hate crimes perpetrated against ethnic minority individuals and communities. Commitment to swift delivery and roll-out of the Refugee Integration and Race Equality Strategies should also be referenced in the PfG, with multi-departmental priority actions included to tackle the root causes of racism and anti-migrant violence.

8. Reform and transformation of public services

- 8.1 Insofar as they relate to victims of crime and safer communities, it is encouraging that the PfG recognises the need for reformation and transformation of public services. However, as referenced above under Safer Communities, it is disappointing that the actions proposed fall short of committing to transformation of the justice system for the benefit of victims of crime.
- 8.2 The justice analysis provided rightly recognises the need to tackle delay in the justice system and better resource policing, and highlights the missed opportunities for offender rehabilitation as a consequence of time spent on remand awaiting trial. This is an incomplete analysis, however, lacking acknowledgment of other areas beyond policing that require reform and transformation to make the justice system more effective and victim-centred.
- 8.3 Whilst proposals to establish a Reform and Transformation Unit incorporating service delivery reform and development of a fiscal framework are positive in theory, the Commissioner Designate is unable to provide further comment due to lack of detail as to what this work would look like in practice or how beneficial its outputs might be for victims of crime. Similarly, whilst the Commissioner recognises that use of technology and digital transformation have the potential to be valuable tools in aiding a reform and transformation agenda, their true efficacy can only be assessed by looking at more granular detail which is absent from the PfG.
- 8.4 Commitment to innovation and sustainability are undoubtedly both important elements of transformation. Given the limited budgetary conditions faced by government at present, however, it would be useful to provide more information as to how the Executive plans to balance innovation initiatives with solid delivery of core services at an adequate level, and whether there is a

plan for how tested innovations can become part of core service delivery infrastructure if they are proven to work.

- 8.5 Any Sustainability Plan must also reflect the value for money and expertise provided by our community and voluntary sector organisations in delivering services and support for some of our most vulnerable citizens including victims of crime, and commit to sustain these organisations to avoid future 'brain drain' as a consequence of short-term funding contracts and inadequate resourcing creating genuine challenges in retaining staff and expertise.
- 8.6 As mentioned previously, the transformation agenda must overcome the existing structural barriers to effective cross-departmental collaboration on cross-cutting societal issues. Bold solutions will be needed to address this effectively and make government more agile and able to truly tackle the big issues facing Northern Ireland, such as justice transformation, confronting the root causes of hate and discrimination, and ending violence against women and girls.

9. Missions

- 9.1 The Commissioner Designate agrees that foundational work on longer term strategic priorities must be included in the PfG. Many of the more complex problems facing our society cannot be resolved in a one-year funding cycle or a single Executive mandate. The Commissioner is therefore frustrated that justice transformation has not been included as a proposed action within the People mission. As per previous comments, victims of crime simply cannot continue to be subjected to a justice system that does not recognise them as participants, uphold their rights, or exacerbates instead of mitigates their trauma at such a vulnerable and challenging time in their lives. Express commitment and action from the NI Executive are needed to push this work forward.
- 9.2 It is also discouraging that neither strategic detail nor any measurable targets are forthcoming within the proposed actions to tease out how the Executive will address the challenges identified, such as integration and racism and keeping people safe.

- 9.3 The overarching mission of Peace is a fitting banner under which all missions sit, given our societal history of conflict and its impacts which continue to resonate throughout our communities and across multiple strands of work. The inclusion of racial equality under this Mission is positive – peace is not just a green and orange matter, and the unrest during the summer months have shown that seeking peace and safety for our minority ethnic communities should be a high priority. This work should not sit to the side of initiatives on community relations but be recognised as a core part of maintaining a peaceful and united community.
- 9.4 The objective to develop a trauma-informed public sector is an important piece in achieving this Mission. It would be helpful if the PfG outlined how this will be achieved and in what timeframe.

10. Wellbeing dashboard

- 10.1 The Commissioner Designate agrees that the wellbeing of individuals and communities in our society may theoretically be a useful way to gauge success of the PfG. In its current form, however, the dashboard's links to the contents of the plan are often not clear and many indicators do not sufficiently measure the success of the stated aims within the PfG.
- 10.2 For instance, the Commissioner Designate is unconvinced that the current measures of Safer Communities will provide a comprehensive gauge of whether the plans outlined in the PfG have been successful. As stated in the CVOC Strategy 2022-25, '*what gets measured gets done*'. Whilst crime prevalence rates, personal safety, safe towns and city centres, and fear of becoming a victim of crime may provide a partial picture of whether we are a safer community, key metrics such as victim confidence in the justice system, crime outcomes rates, and victim mental health in the wake of crime and during/after engagement in the justice process are missing.
- 10.3 Feelings of safety and confidence in justice are not only measured by fear and prevalence of crime, but also what confidence our citizens and communities have in systems and processes in place to support them when they become victims and prevent further or future victimisation of an individual or their community. Without a measure of public and victim confidence in our rule of law and criminal justice system, it is the view of the Commissioner

Designate that it would not be possible to accurately gauge whether our communities are safer or, equally importantly, whether people feel safer.

- 10.4 Furthermore, the metrics of safe towns and centres and personal safety only measure societal feelings of safety in the context of crime perpetrated publicly and by strangers. They do not capture the safety of those at risk of or suffering domestic violence, or those who have experienced or feared sexual assault by someone they know. The indicators also fail to capture feelings of safety living within a community, for instance those at risk of hate attacks on their homes or vulnerable to community coercive control from those with paramilitary links.
- 10.5 The Commissioner Designate understands that the high quality data to accurately capture the experiences of victims and the outcomes of victims may not currently exist – that is all the more reason to commit to better quality data collection, collation and monitoring within this PfG to ensure that the indicators within the Wellbeing Framework are accurately answering the question we are asking.
- 10.6 The Happier Children indicators should include metrics that reflect Adverse Childhood Experiences and child victims of crime.
- 10.7 The Living Peacefully indicators appear to be limited to Catholic / Protestant relations and religious difference, with our BME communities absent from the measures.
- 10.8 EAWG specific indicators should also be included within the Wellbeing Framework. The Office of the Commissioner Designate for Victims of Crime is committed to working with TEO officials in whatever capacity necessary to help develop such measures, and indeed to assist in the delivery of the aims under this section in the interests of creating a society where victims feel valued and have rights to protection, participation, support and redress.

If you would like to discuss any of these points in further detail, please contact the office via:

Tel: 028 9052 6607

Email: policy@cvocni.org